

From: [Yibin Shen](#)
To: [CITYCOUNCIL-List](#)
Cc: [Bill Chapin](#); [Ashley Zieba](#)
Subject: FW: RUBS Response item 7-C
Date: Tuesday, June 16, 2026 3:53:59 PM

Dear Mayor and Council,

I am forwarding the below response to Council question regarding the number of RUBS complaints the Rent Program received in the last few years. Ashley, could you please post this as additional correspondence.

Many Thanks!

Figures on slides 5 and 6 of the staff presentation report that from June 2022 to present, the Rent Program received inquiries from 64 unique tenants about the validity of utility fees.

Some additional context: These 64 inquiries concerned rental properties that have a total of 3,279 rental units. Not all of these inquiries necessarily concerned RUBS. In some cases, they were about increases to a flat monthly utility fee separate from the rent, and in some cases they turned out to be an unbundling issue. I included those cases in my count because the staff investigation still involved determining what utilities were and were not included with the rent.

Staff has found it extremely difficult to get a reliable estimate of the total number of tenancies that are charged utility fees via RUBS, but it is probably safe to say that the Rent Program has received complaints from less than 1 percent of them. However, staff's experience with these cases does not mean that we think there are no issues with utility billing for the other 99+ percent. Instead, we think it means that the complaints represent just the tip of the iceberg: There are a large number of tenants experiencing the exact same issues who never reach out to us.

Our experience with the 34-unit property mentioned in the presentation underscores this point. The investigation began because we heard complaints from two tenants. Over the course of the investigation, staff made several attempts to actively reach out to all 34 tenants, but we only ever received responses from about a third of them. The data and documents we did collect, however, strongly suggests that most of these tenants were being incorrectly billed for utilities.

Another case with an 84-unit property similarly started with complaints from just two tenants, but it quickly became obvious that management's actions had also affected the other 82 units in the exact same way. Management ended up altering their approach for all units to ensure that tenants were not being overcharged for utilities.

Those two cases represent just four inquiries, but more than 100 rental units were affected.

Accordingly, we believe that the 64 complaints really means that the entire population of the 3,279 are being affected.