

SB 130 FAV.pdf

Uploaded by: Albert Turner

Position: FAV



Albert Turner
Public Justice Center
201 North Charles Street, Suite 1200
Baltimore, Maryland 21201
410-625-9409
turnera@publicjustice.org

SB 130 – Environment: Water - Individual Unit Meters

**Hearing before the Senate Education, Energy, and the Environment Committee on
February 3, 2026**

Position: FAVORABLE

The Public Justice Center (PJC) is a nonprofit public interest law firm that stands with tenants to protect and expand their rights to safe, habitable, affordable, and non-discriminatory housing and their rights to fair and equal treatment by Maryland’s landlord-tenant laws, courts, and agencies. The PJC advocates for systemic change to build a just society.

PJC supports **SB 130** and asks for a favorable report because for too many renters in Maryland, they are being strapped with water bills, for the usage of water that is not their own. **SB 130** would finally require that, for individualized meter systems, a landlord could not require a renter to reimburse them for water they never used. For too many Maryland families, water bills are increasing at high rates¹, placing additional strain on renters who already face rising housing, food, and health care costs. Allowing landlords and property managers to bundle utility charges or shift unmetered costs to tenants obscures actual water usage, reduces incentives to conserve water, and disproportionately impacts low-income residents.

The Public Justice Center has too often represented renters who deal with the issue of being overcharged for their water bill usages. Oftentimes, these high-water bills did not just include the renter’s personal water use, but included the water usage of common areas, laundry rooms, and even other neighbors. **SB 130** would end this practice and ensure renters are paying for their own personal water usage.

SB 130 ensures that renters are charged for what they actually use, not subsidizing the excess costs associated with inefficient systems or broader industrial demands on water infrastructure. With the backdrop of rising utility demand and infrastructure strain, now is the right time for Maryland to set standards that protect renters and ensure transparency.

Public Justice Center **urges a favorable report on SB 130**. If you have any questions, please contact Albert Turner, turnera@publicjustice.org (410) 625-9409 Ext. 250.

¹ <https://www.thebanner.com/politics-power/local-government/wssc-water-sewer-montgomery-county-council-costs-bills-prices-4XPDGBMEKJA2NAGHRU7TL4UMJQ/>

The Public Justice Center is a 501(c)(3) charitable organization and as such does not endorse or oppose any political party or candidate for elected office.

SB 130

Uploaded by: Ann Ciekot

Position: FAV



CITY TAKOMA OF PARK MARYLAND

**Senate Bill 130 – Environment – Water – Individual Unit Meters
Senate Education, Energy, and the Environment Committee
February 3, 2026
SUPPORT**

The City of Takoma Park supports SB130, which concerns tenant charges for water in multifamily buildings of three or more units. The bill requires new tenant protections for situations where a building owner or manager chooses to install individual meters and charge tenants for water use.

This bill limits tenant charges to costs charged by the water provider plus a nominal service fee of up to \$1, requires those charges to be based on per unit water use, and disallows charges for common areas or leaks the owner is responsible for. It also requires that landlords maintain and allow tenants access to records tenants would need to verify the amount of their water use and charge. Landlords cannot treat unpaid water bills as unpaid rent when considering evictions. And, the bill provides options for a complaint process for tenants about these provisions.

About half of the City of Takoma Park's nearly 18,000 residents are renters, mostly in buildings with three or more units. We have seen injustices that this bill looks to resolve, including unpaid water bills influencing eviction decisions, landlords overcharging tenants for water, and difficulties accessing records. At this time, the only tools the City has to address these unfair practices are the city housing code and our City Commission on Landlord-Tenant Affairs that hears complaints under the city's housing code and would also hear complaints under this law if passed.

This bill is a welcome addition to tenant protections in our community, and more importantly it extends these protections to tenants statewide. This bill will help us meet our city priority housing goals of ensuring safe, high quality and affordable housing throughout our community, as well as our City's equity goals and priorities. In sum, the City of Takoma Park supports this bill, and encourages a favorable Committee vote.

City Contact: Talisha Searcy, Mayor
talishas@takomaparkmd.gov

SB130_FAV_Tenants of The Grand Apartments.pdf

Uploaded by: Fassil Ketema

Position: FAV

SB130 - SUPPORT
Fassil Ketema
Tenants of The Grand Apartments
fketema@verizon.net
5801 Nicholson Lane,
North Bethesda, Maryland 20852
410-302-9692

SB 130 SUPPORT

Environment - Water - Individual Unit Meters

Education, Energy, and the Environment Committee

February 2nd, 2026

Good afternoon Chair Feldman, Vice Chair Kagan, and Members of the Education, Energy, and Environment and Committee:

My name is Fassil Ketema and I am testifying favorably in regards to Senate Bill 130.

Below, I have copied the petition signed and submitted by 50 tenants of The Grand Apartments (5801 Nicholson Lane, North Bethesda, Maryland 20852) to request an investigation into the business practices and credit reporting activities of Metergy Solutions:

We, the undersigned (**redacted**) tenants of The Grand Apartments, respectfully submit this petition to bring to your attention serious concerns regarding the billing and credit reporting practices of Metergy Solutions, a Canada-based sub-metering and billing service provider retained to administer individual tenant charges for water and sewer usage at our residence.

A four-and-a-half-month investigation conducted by the Montgomery County Office of Consumer Protection (OCP) that was completed in May 2025 concluded that Metergy Solutions has engaged in several improper and concerning practices, including:

1. Permitting collection efforts to proceed on disputed bills that are still pending resolution.
2. Failing to exercise due diligence when estimating water bills during periods of meter malfunction.
3. Lacking transparency about which apartment units were affected by defective or inoperable meters.
4. Ineffectively managing billing related to water leaks, resulting in inaccurate or inflated tenant charges. The OCP report further found that the lack of oversight over private sub-metering systems and related service fees poses a continuing risk to tenants. Currently, Metergy Solutions charges residents an exorbitant monthly administrative and billing fee of \$13.40, which represents an average of over 40% of the actual total monthly water and sewer costs for most tenants. Prior to the retention of Metergy, tenants were customarily charged a \$1 monthly administrative fee.

Despite these official findings, Metergy Solutions has issued a notice to all residents of The Grand Apartments stating that, effective August 15, 2025, it will begin reporting any late or missed water/sewer

bill payments to a credit reporting agency managed by Equifax. The notice further warns that such reporting may negatively affect residents' credit standing, even though several disputes and billing irregularities identified by OCP remain unresolved.

WE THEREFORE PETITION the Maryland Department of Labor and any other appropriate state or county authority to:

1. Determine the legality of Metergy Solutions' plan to report tenants' water and sewer billing histories to credit reporting agencies.
2. Investigate the company's billing, metering, and collection practices as identified in the Montgomery County OCP report.
3. Implement appropriate oversight and consumer protection measures to prevent unfair or deceptive sub-metering and billing practices in Maryland.

We respectfully request that your offices take prompt and appropriate action to ensure transparency, fairness, and accountability in Metergy Solutions' billing and credit reporting operations - both for the residents of The Grand Apartments and for other Maryland tenants affected by similar practices.

Respectfully Submitted,

The Tenants of The Grand Apartments

5801 Nicholson Lane

North Bethesda, Maryland 20852

Signed by 50 total residents including:

- | | |
|------------------------------|---------------------------|
| - Fassil Ketema | - Marilyn Hardis |
| - Susan Asch | - Tobias Gottesman |
| - Elisabeth Richards | - Jeff Szekely |
| - Ann Bausch | - Howard Diener |
| - Debra L. Weingarten | - Jamie Wollard |
| - Keith White | - Laurie Zeitlih |

SB130_FAV_Stewart.pdf

Uploaded by: Kate Stewart

Position: FAV



**MONTGOMERY COUNTY COUNCIL
ROCKVILLE, MARYLAND**

KATE STEWART
COUNCILMEMBER
MONTGOMERY COUNTY COUNCIL

February 3, 2026

TO: The Honorable Brian Feldman
Chair, Education, Energy, and the Environment Committee

FROM: Kate Stewart
Montgomery County Councilmember, District 4

RE: Senate Bill 130, *Environment - Water - Individual Unit Meters*
Support

My name is Kate Stewart and I serve as the Montgomery County Councilmember for District 4. Today, I am speaking on behalf of myself in support of Senate Bill 130, *Environment - Water - Individual Unit Meters*.

This bill authorizes a landlord who owns a building served by a master water meter that measures consumption for the whole building to install individual water meters for each dwelling unit and imposes requirements to ensure that tenants are treated fairly. The bill includes provisions that: (1) require a landlord to allocate water usage charges in proportion to actual water usage by each unit; (2) prohibit a landlord from passing on to tenants the costs associated with poor maintenance or leaks or common area usage; (3) prohibit a landlord from charging more than \$1 per unit per month to cover the administrative costs of billing; (4) require that each individual water meter include a leak detection monitor; (5) require landlords to maintain adequate records for individual meters that may be inspected by tenants; (6) prohibit the inclusion of unpaid water bills in the calculation of “unpaid rent” in an eviction proceeding; and (7) outline a process for filing complaints for violation of the bill.

This bill came about after hearing from residents of The Grand, an apartment complex with over 500 units in my district, as well as residents in other buildings. Residents shared experiences of

The Honorable Brian Feldman

Re: Senate Bill 130, *Environment - Water - Individual Unit Meters*

February 3, 2026

Page 2

malfunctioning water meters, retroactive billing based on estimated usage, and service fees that in some cases matched or exceeded monthly water charges. Given these concerning claims, my office brought in the Montgomery County Office of Consumer Protection (OCP) to conduct an investigation. OCP found several gaps in existing law which allowed this situation to occur. We know this issue is not just happening at The Grand, but with over 500 units they were best placed to speak up and to bring in OCP to do an investigation and provide recommendations on how to avoid these situations in the future.

At this naturally occurring affordable housing property, tenants were taken advantage of and made to pay potentially large amounts of money for a limited and sometimes faulty level of service. I want to thank Delegate Lorig Charkoudian for drafting and bringing this bill forward in the House and Senator Shaneka Henson for cross-filing it in the Senate.

This legislation is needed to protect others from dealing with the same issues. It will ensure the installation of individual water meters is monitored and properly regulated. I urge you to support this bill to ensure greater protections for tenants throughout Maryland regarding access to water and cost of water usage.

SB 130 - MoCo_Elrich_FAV (GA 26).pdf

Uploaded by: Marc Elrich

Position: FAV



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

February 3, 2026

TO: The Honorable Brian J. Feldman
Chair, Education, Energy, and the Environment Committee

FROM: Marc Elrich
County Executive

RE: Senate Bill 130, *Environment - Water - Individual Unit Meters*

Support

I am writing to express my support for Senate Bill 130, *Environment - Water - Individual Water Meters*, because it addresses critical issues that were identified in a May 2025 report issued by Montgomery County's Office of Consumer Protection (OCP) after investigating tenant complaints about water billing practices at the Grand Apartments, a 525-unit apartment complex located in the County. The complaints included malfunctioning water meters, retroactive billing based on estimated usage over a six-month period, and services fees that in some cases matched or exceeded monthly water charges. The report concluded that there is a gap in the regulation of billing practices for private individual water meters. These types of meters are not regulated by the Public Services Commission or the Washington Suburban Sanitary Commission and there are no protections in current State law regarding excessive service fees, deficient maintenance, replacement practices, or inaccurate changes.

This bill applies to a landlord who owns a building served by a master water meter that measures consumption for the whole building. The bill allows a landlord to install individual water meters for each dwelling unit but includes a variety of provisions to ensure tenants are treated fairly, including provisions that: (1) require a landlord to allocate water usage charges in proportion to actual water usage by each unit; (2) prohibit a landlord from passing on the costs associated with poor maintenance, leaks, or common area usage; (3) prohibit a landlord from charging more than \$1 per unit per month to cover the administrative costs of billing; (4) require that each individual water meter include a leak detection monitor; (5) require landlords to maintain adequate records for individual meters that may be inspected by tenants; (6) prohibit the inclusion of unpaid water bills in the calculation of "unpaid rent" in an eviction proceeding; and (7) outline a process for tenants to file complaints for violation of the bill.

The Honorable Brian J. Feldman

Re: Senate Bill 130

February 3, 2026

Page 2

Importantly, the bill requires the Maryland Department of the Environment, in consultation with the Department of Housing and Community Development, to adopt regulations governing accuracy, testing, and recordkeeping for individual private water meters.

The absence of regulatory oversight of individual private water meters poses significant risk to tenants throughout the State. I respectfully request that the Senate Education, Energy, and the Environment Committee help remedy this situation by voting favorable on this bill.

SB 130 - MoCo_Elrich_FAV (GA 26).pdf

Uploaded by: Marc Elrich

Position: FAV



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

February 3, 2026

TO: The Honorable Brian J. Feldman
Chair, *Education, Energy, and the Environment Committee*

FROM: Marc Elrich
County Executive

RE: Senate Bill 130, *Environment - Water - Individual Unit Meters*

Support

I am writing to express my support for Senate Bill 130, *Environment - Water - Individual Water Meters*, because it addresses critical issues that were identified in a May 2025 report issued by Montgomery County's Office of Consumer Protection (OCP) after investigating tenant complaints about water billing practices at the Grand Apartments, a 525-unit apartment complex located in the County. The complaints included malfunctioning water meters, retroactive billing based on estimated usage over a six-month period, and services fees that in some cases matched or exceeded monthly water charges. The report concluded that there is a gap in the regulation of billing practices for private individual water meters. These types of meters are not regulated by the Public Services Commission or the Washington Suburban Sanitary Commission and there are no protections in current State law regarding excessive service fees, deficient maintenance, replacement practices, or inaccurate changes.

This bill applies to a landlord who owns a building served by a master water meter that measures consumption for the whole building. The bill allows a landlord to install individual water meters for each dwelling unit but includes a variety of provisions to ensure tenants are treated fairly, including provisions that: (1) require a landlord to allocate water usage charges in proportion to actual water usage by each unit; (2) prohibit a landlord from passing on the costs associated with poor maintenance, leaks, or common area usage; (3) prohibit a landlord from charging more than \$1 per unit per month to cover the administrative costs of billing; (4) require that each individual water meter include a leak detection monitor; (5) require landlords to maintain adequate records for individual meters that may be inspected by tenants; (6) prohibit the inclusion of unpaid water bills in the calculation of "unpaid rent" in an eviction proceeding; and (7) outline a process for tenants to file complaints for violation of the bill.

The Honorable Brian J. Feldman
Re: Senate Bill 130
February 3, 2026
Page 2

Importantly, the bill requires the Maryland Department of the Environment, in consultation with the Department of Housing and Community Development, to adopt regulations governing accuracy, testing, and recordkeeping for individual private water meters.

The absence of regulatory oversight of individual private water meters poses significant risk to tenants throughout the State. I respectfully request that the Senate Education, Energy, and the Environment Committee help remedy this situation by voting favorable on this bill.

cc: Members of the Education, Energy, and the Environment Committee

SB130 Testimony.pdf

Uploaded by: Matthew Losak

Position: FAV



TESTIMONY
Maryland General Assembly
Education, Energy and the Environment Committee
In Favor of SB130 – Environment – Water – Individual Unit Meters

Matt Losak, (888) 668-7717, info@rentersalliance.org
Executive Director, Renters Alliance, Inc.
Feb. 3, 2026 at 1:00PM

Good afternoon, Chairman Feldman, Vice Chair Kagan, and Committee members. My name is Matt Losak and I am submitting this testimony on behalf of the Renters Alliance as its executive director. The Renters Alliance is Maryland's first and only regional nonprofit dedicated exclusively to renter outreach, education, organizing, and advocacy. Since our founding in 2010, the Renters Alliance has been an unwavering advocate for expanding and strengthening renter protections, which distinctly aligns with the goals of SB130 regarding fair practices in metering and billing of water utilities in apartment buildings.

The Renters Alliance is in strong support of SB130, which will fill an existing gap in regulation and oversight of utility service delivery and billing in multifamily properties. Unlike the regulation required by Maryland law of individual electricity meters for individual rental units, we are not aware of any current laws that regulate private, individual water meters installed in apartment buildings. For tenants at The Grand in North Bethesda, this legal loophole led to a lot of confusion and frustration over their water bills.

When we started receiving calls from the Grand tenants' association and individual residents, we were astonished to hear about the high services charges being added on to their water bills, and the lack of any oversight - beyond the private company contracted by the landlord - regarding the maintenance of the meters and the accuracy of the readings and associated billing.¹

We are grateful to Senator Henson for drafting and introducing SB130 to put a stop to these unfair practices that exploit tenants' need for this most basic of services. Many residents at the Grand are seniors on a fixed income who can become completely destabilized by a landlord who decides to take advantage of there being no existing cap on service charges. The \$1 limit on services charges in SB130 would bring water billing in line with other utility regulation and help prevent the destabilization that comes with unexpected, exorbitant bills.

We also appreciate the provisions in the bill ensuring proper maintenance of individual, private water meters, and transparency for tenants around how the meters are functioning and whether leaks are detected.

¹ *The Grand Apartments - Review of Water Billing Practices*. Montgomery County Office of Consumer Protection, May 5, 2025

Finally, it is worth noting that SB130 would codify the prohibition of a landlord treating unpaid or disputed water bills as rent for purposes of a Failure to Pay Rent action.

This bill will offer a crucial fix for an existing gap in utility regulation for renters, by applying the fair, common-sense regulation that is required of most utilities to individual, private water meters installed by landlords. We strongly urge a favorable report. Thank you.

5.5.25_The Grand Apartments - Review of Water Bill

Uploaded by: Senator Shaneka Henson

Position: FAV



THE GRAND APARTMENTS - REVIEW OF WATER BILLING PRACTICES

Montgomery County Office of Consumer Protection

Merchants:

- Wisconsin Park Associates Limited Partnership
- Brookfield Properties LLC
- Metergy Solutions LLC

Case Numbers: 24-OC-090451 and 25-OC-090558

May 5, 2025



EXECUTIVE SUMMARY

On December 20, 2024, the Office of Consumer Protection (OCP) initiated an Executive Director complaint in response to concerns raised by the Department of Housing and Community Affairs regarding water billing practices at a 525-unit apartment complex. The investigation aimed to identify regulatory deficiencies, assess the impact on residents, and recommend corrective measures to improve fairness and transparency in billing practices.

INVESTIGATION OVERVIEW

The investigation was prompted by tenant reports of malfunctioning water meters, retroactive billing based on estimated usage over a six-month period, and service fees that in some cases matched or exceeded monthly water charges.

Based on our investigation, there are three affiliated entities involved: Wisconsin Park Associates Limited Partnership, Brookfield Properties LLC, and Metergy Solutions LLC.

Beyond reviewing individual complaints, the investigation evaluated the clarity of tenant contracts and documented mediation efforts undertaken to address tenant grievances. A central focus was the extent to which the Maryland State Public Service Commission (PSC), the Washington Suburban Sanitary Commission (WSSC), and Montgomery County Code Chapter 11 regulate private water meters, water utility billing, and related service fees.

This report identifies key regulatory gaps and proposes reforms to better protect consumers.

METHODOLOGY

To ensure a thorough and unbiased evaluation of the water billing issues, our investigative process was structured around several key components. Each component was designed to capture a complete picture of the issues at hand, helping us identify recurring problems, specific billing issues, and engage with affected tenants. The following sections outline the specific elements of our methodology:

- **Tenant Engagement:** We initiated direct communications with tenant groups to collect detailed accounts of their experiences. Structured interviews and focus group discussions were conducted to identify and document the specific issues faced by residents, ensuring that a broad range of perspectives was captured.

- **Document Collection:** A comprehensive review of relevant documents was undertaken. This included the collection of tenant contracts, billing records, previous complaint filings, and other pertinent records. These documents provided critical context and allowed us to trace the chronology and specifics of the billing issues.
- **Legal and Regulatory Review:** We conducted an in-depth examination of the applicable regulatory framework, including provisions under Chapter 11, as well as guidelines set forth by the PSC and WSSC. This review was instrumental in identifying any regulatory violations or protection gaps that might contribute to the consumers' challenges.
- **Mediation Efforts:** Recognizing the immediate need for resolution, we facilitated mediation sessions with the merchant responsible for water billing. These efforts aimed to address tenant concerns directly and achieve prompt remedial actions while broader regulatory and legislative solutions are considered.

FINDINGS

Our investigation has identified several critical areas in water billing practices that expose consumers to significant risks:

1. Service Fees and Gaps in Chapter 11

- Chapter 11 currently offers no consumer protections against excessive service fees related to water billing.
- In contrast to other industries (e.g., automotive repair), no statutory standards or limitations govern such fees in utility billing.
- New legislation is recommended to prevent unreasonable service fees and safeguard tenants.

2. Lack of Oversight for Private Meters

- Private meters are not regulated by WSSC or the PSC, leading to inconsistent billing practices and limited accountability.
- Deficient maintenance and replacement practices can result in inaccurate charges and tenant confusion.

3. Contract Complexity

- Although technically comprehensive, tenant contracts are overly complex and difficult for the average consumer to interpret.
- A simplified summary in plain language is recommended to improve transparency and ensure informed consent.

Investigators found that poor communication by Brookfield and Metergy, compounded by aggressive collection practices – even in cases of disputed or demonstrably inaccurate bills – created a climate of distrust. Tenants were often unaware of applicable regulations, contributing to misunderstandings. Confirmed errors in billing further eroded confidence.

In OCP’s assessment, Metergy:

- Failed to exercise due diligence in estimating bills during meter malfunctions.
- Lacked transparency about which units had defective or inoperable meters.
- Did not effectively manage billing tied to leaks.
- Permitted collection efforts to continue on disputed bills pending resolution.

These failings not only exacerbated consumer frustration but also highlighted the need for stronger oversight and clearer communication between utility service providers and residents. While cooperative mediation efforts are a positive step forward, meaningful reform will require both legislative and procedural changes to prevent recurrence and rebuild trust.

This office will continue to address complaints regarding individual tenant water billing disputes as they are submitted to OCP. We anticipate that billing concerns will diminish once accurate meter installation is complete. This will allow Metergy to respond to tenant concerns more effectively.

COMPLAINT MEDIATION EFFORTS

During mediation, the merchant demonstrated a willingness to work cooperatively with OCP and respond to tenant concerns. Acknowledging gaps in consumer protection under Chapter 11, the merchant took several steps to improve transparency and provide interim relief.

These actions included:

- Issuing a community-wide notice explaining the structure and rationale behind service fees.
- Providing a \$25 credit to all 525 units, irrespective of meter status, to promote fairness.

This cooperative engagement not only addressed immediate complaints but also established a more constructive model for future communication and accountability.

CONCLUSIONS

This investigation revealed significant gaps in consumer protections surrounding water billing in multi-unit dwellings. As previously detailed, the absence of oversight over private meters and service fees continues to pose a significant risk.

Moreover, the investigation confirmed that billing errors did occur and that Metergy failed to adequately respond to tenant concerns in a timely and transparent manner.

Poor communication from Metergy and Brookfield, along with aggressive collection tactics – even when bills were under legitimate dispute – eroded tenant trust. These practices were further complicated by a widespread misunderstanding of relevant billing regulations among tenants.

The findings underscore how gaps in regulation of water and sewer billing by landlords can enable unethical practices, strain landlord-tenant relationships, and increase hardship for tenants – especially those who are low-income, elderly, or otherwise vulnerable. Our office is hopeful that regulations will be updated to address these issues to improve transparency, fairness, and accountability.

RECOMMENDATIONS

- **Legislative Action:** Advocate for the development of new laws to provide explicit protections against excessive service fees in water billing.
- **Expanded Regulatory Oversight:** Recommend state agencies extend jurisdiction to private water meters.
- **Contract Simplification:** Require plain-language summaries of billing-related contract terms and include:
 - Estimated daily usage rates applied during meter failure; and
 - A prohibition on service fees during estimated billing periods.

- **Ongoing Mediation:** Continue merchant engagement to resolve active disputes and monitor improvements.
- **Annual Reconciliation:** Offer tenants annual access to meter readings for self-auditing, with explanatory guides.
- **OCP Notice Posting:** Inform tenants of OCP complaint processes and clarify the legal status of monthly service fees.
- **Pause on Collections:** Suspend collections and finance charges during the dispute resolution process.
- **Biannual Meter Inspections:** Allow tenants to request twice-yearly inspections for leak detection.
- **Leak Alert System:** Explore implementing a real-time feedback system to flag abnormal water usage.
- **Infrastructure Investment:** Consider installing recirculating pumps to reduce water waste in distant units.

CLOSING

The Office of Consumer Protection extends its appreciation to all parties who participated in this investigation. We thank the tenants for their candid feedback and cooperation throughout the process, and we acknowledge Metergy and Brookfield for engaging in constructive mediation and taking initial steps toward resolution. Continued collaboration between Metergy and tenants will be essential to implementing lasting improvements in water billing practices and restoring a relationship of trust.

SB130 Sponsor Testimony2.3.pdf

Uploaded by: Senator Shaneka Henson

Position: FAV

SHANEKA HENSON
Legislative District 30
Anne Arundel County

Judicial Proceedings Committee

Joint Committee on Children,
Youth, and Families



James Senate Office Building
11 Bladen Street, Room 203
Annapolis, Maryland 21401
410-841-3578
800-492-7122 Ext. 3578
Shaneka.Henson@senate.state.md.us

THE SENATE OF MARYLAND
ANNAPOLIS, MARYLAND 21401

SPONSOR TESTIMONY

**Senate Bill 130
Water - Individual Unit Meters**

Chair Feldman, Vice Chair Kagan and Committee members of the Education, Energy, and the Environment Committee

For the record, I am Shaneka Henson, representing District 30 in Anne Arundel County and member of the JPR Committee

It is my privilege to present Senate Bill 130 - Water - Individual Unit Meters

While this bill authorizes owners, operators, or managers (or contractors hired by owners, operators, or managers) to install individual unit water meters for apartments and other dwelling units such as condominiums where multiple users exist, receiving water service in bulk from one source --

It also prohibits the owners or management of these housing units, who have installed the individual meters, from imposing any additional water or sewerage costs on the unit other than the actual charges imposed by the water service provider.

In addition, the bill (1) requires that the owner (or agent) maintain records of the owner's actual use and (2) prohibits any unpaid water bills from being considered as unpaid rent, should an eviction proceeding occur.

You may be familiar with this issue as this bill was brought to Delegate Charkoudian's attention by owners of a 525-unit apartment complex in Montgomery County. Angered at that complaints were being ignored, the tenants had the County's Office of Consumer Protection investigate their reports of malfunctioning water meters, receiving excessive and retroactive bills over their actual usage for over a six-month period, as well as receiving service fees that in some cases matched or exceeded their monthly water charges.

A copy of the report produced by the Montgomery County Department of Consumer Protection is provided with this testimony, which includes a series of recommended actions. One of which is the enactment of state legislation, the bill before you today, to protect all individual meter users receiving bulk water service against receiving bills with excessive and fraudulent service fees above the actual use. This bill has important implications for residents throughout the state in other communities with individual meters, including those in mobile home.

The testimony from the witnesses here today will share the examples of the basis for this legislation. I urge a favorable report from the Committee on this extremely basic and important consumer protection legislation.

Thank you.

SB0130 - Maryland Legal Aid - FAV.pdf

Uploaded by: Zafar Shah

Position: FAV



Senate Bill 130 — Environment – Water – Individual Unit Meters

Hearing before the Senate Education, Energy, and the Environment Committee,

On February 3, 2026

Position: FAVORABLE

Maryland Legal Aid submits its written testimony in support of Senate Bill 130 at the request of the bill sponsor Senator Shaneka Henson.

Maryland Legal Aid is a nonprofit law firm that provides free civil legal services to low-income and vulnerable Marylanders. Our offices serve residents in all 24 jurisdictions, and housing is our largest area of practice. Last year, Maryland Legal Aid’s Tenant Right to Counsel Project represented over 4,700 renter households across the State in eviction proceedings. In many cases, unpredictable utility costs, combined with unaffordable rent, throw our clients into a cycle of housing destabilization. We therefore urge the Committee’s **favorable** report on SB 130, which provides consumer-facing tools for holding third-party companies accountable for erroneous individual metering (or “submetering”) of water and sewer utilities.

SB 130 establishes transparency rules for an emerging, unregulated utility market: water/sewer submetering in multi-family rental properties. Water submetering involves metering equipment, billing, and customer service operated by a third-party company, which is not a public utility company. SB 130 fills an important gap in consumer protection by introducing regulation of these third-party companies. Currently, the Public Service Commission does not oversee water submetering. The state regulates apartment building submetering only for electricity and gas (COMAR Title 20, Subtitle 25). When it comes to water/sewer utilities, state law has yet to submetering, which is separate and distinct from more common water billing methods like Ratio Utility Billing Systems (regulated under Real Property § 8-212.4) or tenant-to-landlord utility charges (covered by Real Property §§ 8-205.1 and 8-205.2).

The protections in SB 130 are a critical first step in regulating water submeters.

This legislation proposes five (5) significant areas of protection for renters in buildings that utilize individual water metering.

1. *Transparency requirements*: Landlords must maintain, and provide tenants access to, detailed records “necessary for a tenant to verify a water utility bill,” including records of total building costs imposed by the utility, total revenue collected from tenants, and the formula used to allocate the cost of each unit’s consumption.
2. *Junk fee protection*: The bill prohibits charges to tenants for water/sewer costs beyond what the water utility actually charged to the property owner. It bars charges to tenants for the costs associated with common areas, leaks, and poor maintenance. The bill also caps any “additional service charge” at \$1.00 per unit per month.
3. *Eviction protection*: The bill expressly prohibits the treatment of unpaid water bills as unpaid rent in eviction proceedings. This provision codifies existing Maryland case law such as *Westminster Management, LLC v. Smith*, 486 Md. 616 (2024), and *Sager v. Housing Commission of Anne Arundel County*, 957 F. Supp. 2d 627 (D. Md. 2013).
4. *Equipment standards*: The bill mandates leak detection monitors on all individual unit meters and requires that tenants be able to periodically inspect those monitors. The bill also tasks the Maryland Department of the Environment with adopting accuracy, testing, and record-keeping regulations “at least as stringent” as those currently in place for water service provider meters.
5. *Complaint process*: Tenants will have redress for violations via complaints to a local landlord-tenant commissions, local consumer protection agency, or the Consumer Protection Division of the Office of the Attorney General.

These protective measures provide an important first step for Maryland in regulating third-party water/sewer submetering. Notably, SB 130 falls short of the breadth of protections that exist currently for electric and gas submetering. For instance, for electricity and gas, Maryland requires:

- Lease disclosure, so that tenants are made aware of their contractual obligations for submetered billing;
- Universal installation, obligating the landlord to use submeters for all units and prohibiting selective use of submeters;
- Free submeter testing on tenant request;
- Pre-installation accuracy testing for each submeter;

- Overcharge and back-billing remedies related to inaccurate meters or limits;
- Bill format, so that the third party’s billing statement includes critical information like meter readings, calculation methodology, and dispute contacts.
- Limitations on estimated billing, limited to cases of broken, tampered, or inaccessible submeters

These additional measures can – and should – be accomplished by Department of the Environment and the Department of Housing and Community Development, pursuant to subsection (e) of the bill (page 4).

SB 130 enables renters to verify the basis and accuracy of submetered billing.

Defending a Howard County tenant from eviction based on unpaid water bills, Maryland Legal Aid reviewed over 2 years of monthly billing statements sent to our client by the submeter company Minol. As shown below, these billing statements provided some important information about submeter readings, consumption, and calculations – but not all the information necessary to verify the accuracy of the charges.

▶ WATER & SEWER SERVICE FROM 10/8/2024 TO 11/8/2024						
<i>This statement is not from Howard County. This statement reflects individual submetered usage.</i>						
Meter Number		Current Reading	Previous Reading	Usage		
[REDACTED]		298800	292040	6760		
				Total Usage	6,760	
Charge Description	Qty1	Days	Qty2	Rate	Unit	Amount
WATER	-	31	6,760.00	0.003489	Gallons	\$23.59
WATER BASE	-	31	31.00	0.036129	Per Day	\$1.12
SEWER	-	31	6,760.00	0.005013	Gallons	\$33.89
SEWER BASE	-	31	31.00	0.074982	Per Day	\$2.32
ADMIN FEE	-	31	1.00	3.00	Cycle	\$3.00
Total WATER & SEWER Charges						\$63.92

Specifically, the billing statements did not explain the basis for the “Rate” numbers used in the calculation, nor did they explain what a “water base” and “sewer base” are. Our client’s lease lacked these details, as well.

This example reveals, on one hand, that consumption data and other details can be provided to tenants and retained for recordkeeping by landlords. On the other hand, we see that there remain other areas of vital information which tenants are unlikely to access readily without enactment of SB 130.

Predatory utility billing and “junk” fees pose outsized harm to our clients.

Thirty-seven percent of U.S. households would not be able to cover a \$400 emergency expense using cash or its equivalent, according to a survey of over 12,000 adults conducted by Federal Reserve.¹ Particularly for low-income renters, an unexpectedly high utility bill from an inaccurate submeter or charges based on common areas could lead to extreme destabilization. In Ohio, where reform of water and electric submetering has recently become the subject of appellate litigation and bipartisan legislative efforts, tenants have complained “that they’re regularly hit with unreasonable water and electric costs from submeters... [including] costs from common areas like hallways and lobbies.”²

Submetering has been shown to raise utility costs substantially without effective regulation. According to one investigation, Ohio residents paid 5% to 40% more when their landlords worked with third-party submetering companies.³ In Salisbury, Maryland, a multi-family landlord is charging our client and their neighbors an annual \$120 “account fee” for electric submetering

¹ Board of Governors of the Federal Reserve System, Report on the Economic Well-Being of U.S. Households: Survey of Household Economics and Decisionmaking (updated May 28, 2025), <https://www.federalreserve.gov/consumerscommunities/sheddataviz/unexpectedexpenses.html>; see also Aaron McCade, “Here’s How Many Americans Can’t Afford a \$400 Emergency—The Numbers May Shock You,” Investopedia (Sept. 22, 2025), <https://www.investopedia.com/here-s-how-many-americans-can-t-afford-a-usd400-emergency-the-numbers-may-shock-you-11814788> (“That means 37% said they either couldn’t pay it, would turn to a credit card with plans to pay it off later, sell something, borrow money from a friend or relative, or take out a loan of some kind. About 13% of the entire survey said they wouldn’t be able to cover the expense at all.”).

² Jake Zuckerman, “Ohio lawmakers target utility middlemen accused of jacking up electric prices,” Signal Cleveland (May 6, 2025), <https://signalcleveland.org/ohio-lawmakers-target-utility-submeterers/>

³ Jessica Balmert, “Ohio renters say utility bills are too high due to submetering. Lawmakers want to change it,” Cincinnati Enquirer (June 6, 2025), <https://www.cincinnati.com/story/news/politics/2025/05/06/ohio-lawmakers-want-to-add-protections-for-submetering-customers>.

– in violation of Maryland’s existing \$1.00 monthly cap on administrative fees for electric submeters. Without regulations in place, submetering leaves renters vulnerable to price gouging, junk fees, and pass-through costs that defray the landlord’s expense for installation of and maintenance of submeter equipment.

In recent years, the General Assembly has made strides to increase transparency in water billing for renters. SB 130 fills in a critical gap in this policy arena that will increasingly impact Maryland renters as more apartment buildings convert to submetering. **Maryland Legal Aid urges the Committee to report Favorable on SB 130.** If you have any questions, please contact:

Zafar S. Shah
Advocacy Director for Human Right to Housing
zshah@mdlab.org | (410) 951-7672

AOBA SB130 FWA.pdf

Uploaded by: Brian Anleu

Position: FWA



Bill: SB130 – Environment – Water – Individual Meters
Committee: Education, Energy, and the Environment
Date: February 3, 2026
Position: Favorable with amendments

The Apartment and Office Building Association (AOBA) of Metropolitan Washington is a non-profit trade association representing the owners and managers of more than 23 million square feet of commercial office space and 133,000 apartment rental units in Montgomery and Prince George’s counties. AOBA submits the following testimony in support of Senate Bill 130 with amendments.

SB130 authorizes water submetering in multifamily buildings; requires adequate record keeping of the water billing process and formulas used to calculate individual water costs; limits water charges to actual usage; requires leak detection monitoring devices for each meter; and limits administrative billing fees to \$1 per meter per month.

AOBA supports efforts to increase water billing transparency and conservation efforts. Water submetering supports both goals by giving tenants direct control over their water bills. However, submetering requires housing providers to invest significant capital that cannot be recovered. Given this significant investment and the benefits to the tenants, AOBA respectfully requests the following amendments:

1. On page 2, lines 1 – 7; strike lines 5 –7 and limit adequate recordkeeping to 12 months instead of 2 years;

12 months is the most common lease term and most accurately reflects the actual water billing costs to the unit.



2. On page 3, lines 29 – 32; increase the service charge from \$1 per meter to the reasonable market cost of such services and not more than the actual cost billed to the owner, operator or manager for that service;

Submeter billing is administered by third-party billing companies that often charge more than \$1 to process bills. Limiting the service charge raises operating costs for housing providers and discourages investment in submetering. This fee should be increased to the actual costs billed to the housing provider.

3. On page 4, lines 8 – 13; strike the leak detection requirements; and
Commercial grade leak detectors are inaccurate, fail frequently, and are difficult to scale for multifamily buildings. A typical multifamily unit, for example, may have multiple water service lines known as risers that provide water to different parts of the unit. The optimal location for a leak detector is on a riser, which is located behind walls and is inaccessible to the tenant.
4. Add alternate billing methods for individual submeters in the event of water leaks or submeter malfunctions.

Older buildings frequently have water leaks, and the submeters themselves may fail to report data. In both scenarios, the tenant continues to use water and must remain responsible for their portion of the costs. As such, a housing provider must have an alternate billing method for tenants in the event of a leak or submeter malfunction. Housing providers should be able to use the most recent three months of actual usage or the average of the last three months for similarly sized units.

Attached to this testimony is a markup of the bill with the amendments above. AOBA urges a favorable report on Senate Bill 130 with these amendments. For more information, please contact Brian Anleu at banleu@aoba-metro.org.

HOUSE BILL 220

M3, N1

(PRE-FILED)

6lr1505
CF SB 130

By: **Delegate Charkoudian**

Requested: October 30, 2025

Introduced and read first time: January 14, 2026

Assigned to: Environment and Transportation

A BILL ENTITLED

1 AN ACT concerning

2 **Environment – Water – Individual Unit Meters**

3 FOR the purpose of authorizing the installation of individual **sub** water meters for certain
4 apartment houses and dwelling units; prohibiting the owner, operator, or manager
5 of an apartment house, or a contractor hired by the owner, operator, or manager,
6 from imposing certain costs on a unit;
7 **;;requiring the owner, operator, or manager to maintain the**
8 **individual sub meters in working order**, requiring the owner,
9 operator, or manager of an apartment house, or a contractor hired by the owner,
10 operator, or manager to maintain certain records; establishing a certain
complaint process; and generally relating to individual water **sub** meters.

11 BY adding to

12 Article – Environment

13 Section 9–1115

14 Annotated Code of Maryland

15 (2014 Replacement Volume and 2025 Supplement)

16 SECTION 1. BE IT ENACTED BY THE GENERAL ASSEMBLY OF MARYLAND,
17 That the Laws of Maryland read as follows:

20 **Article – Environment**

21 **9–1115.**

22 **(A) (1) IN THIS SECTION THE FOLLOWING WORDS HAVE THE MEANINGS**
23 **INDICATED.**

EXPLANATION: CAPITALS INDICATE MATTER ADDED TO EXISTING LAW.
[Brackets] indicate matter deleted from existing law.

hb0220

1 **(2) “ADEQUATE RECORDS” INCLUDES:**

2 **(I) A COPY OF ALL CHARGES THAT THE WATER SERVICE**
3 **PROVIDER IMPOSED ON THE OWNER, OPERATOR, OR MANAGER OF AN APARTMENT**
4 **HOUSE IN THE PRECEDING 12 MONTHS; AND;**

5 **(II)(IV) AN EXPLANATION OF THE FORMULA USED TO**
6 **ALLOCATE**
7 **THE COST OF EACH UNIT’S WATER CONSUMPTION; AND**

7 **(3) (I) “APARTMENT HOUSE” MEANS ONE OR MORE BUILDINGS**
8 **THAT EACH CONTAIN MORE THAN TWO DWELLING UNITS AND IN WHICH ALL THE**
9 **DWELLING UNITS ARE OCCUPIED PRIMARILY FOR NONTRANSIENT USE WITH RENT**
10 **PAID AT INTERVALS OF 1 WEEK OR LONGER.**

11 **(II) “APARTMENT HOUSE” INCLUDES A RESIDENTIAL**
12 **CONDOMINIUM OR COOPERATIVE, WHETHER THE UNITS ARE RENTED OR OWNER**
13 **OCCUPIED.**

14 **(4) “DWELLING UNIT” MEANS PREMISES THAT CONSIST OF ONE OR**
15 **MORE ROOMS SUITABLE FOR OCCUPANCY AS A RESIDENCE AND THAT CONTAIN**
16 **KITCHEN AND BATHROOM FACILITIES.**

17 **(5) “INDIVIDUAL SUB METER” MEANS EQUIPMENT USED TO**
18 **DETERMINE THE ACTUAL USE OF WATER FOR EACH RESIDENTIAL UNIT IN AN**
19 **APARTMENT HOUSE.**

20 **(6) “WATER SERVICE PROVIDER” MEANS, AS APPLICABLE:**

21 **(I) A POLITICAL SUBDIVISION THAT PROVIDES WATER AND**
22 **SEWERAGE SERVICES UNDER SUBTITLE 7 OF THIS TITLE;**

1 (II) A WATER COMPANY, AS DEFINED IN § 1-101 OF THE PUBLIC
2 UTILITIES ARTICLE; OR

3 (III) THE WASHINGTON SUBURBAN SANITARY COMMISSION.

4 (B) SUBJECT TO THE PROVISIONS OF THIS SECTION, AND WITH THE
5 APPROVAL OF THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT, A
6 LOCAL HOUSING AUTHORITY ESTABLISHED UNDER DIVISION II OF THE HOUSING
7 AND COMMUNITY DEVELOPMENT ARTICLE MAY INSTALL INDIVIDUAL **SUB** METERS
8 FOR ANY COMBINATION OF APARTMENT HOUSES OR DWELLING UNITS.

9 (C) AN OWNER, AN OPERATOR, OR A MANAGER OF AN APARTMENT HOUSE,
10 OR A CONTRACTOR HIRED BY THE OWNER, OPERATOR, OR MANAGER, MAY INSTALL
11 AN INDIVIDUAL **SUB** METER FOR EACH DWELLING UNIT THAT IS NOT **DIRECT**
12 **METERED** FOR WATER TO ALLOCATE FAIRLY THE COST OF EACH UNIT'S WATER
13 CONSUMPTION.

14 (D) (1) AN OWNER, AN OPERATOR, OR A MANAGER OF AN APARTMENT
15 HOUSE, OR A CONTRACTOR HIRED BY THE OWNER, OPERATOR, OR MANAGER, WHO
16 INSTALLS INDIVIDUAL **SUB** METERS UNDER THIS SECTION TO PROVIDE BULK
17 **METERED** SERVICE MAY NOT IMPOSE ON A UNIT IN THE FACILITY ANY WATER OR
18 **SEWERAGE** COST EXCEPT THE CHARGES THAT THE WATER SERVICE PROVIDER
19 ACTUALLY IMPOSES ON THE OWNER, OPERATOR, OR MANAGER.

20 (2) THE CHARGES IMPOSED UNDER PARAGRAPH (1) OF THIS
21 SUBSECTION SHALL BE ALLOCATED **TO EACH** UNIT IN PROPORTION TO THE
22 ACTUAL USAGE BY **THAT** UNIT.

23 (3) THE OWNER, OPERATOR, OR MANAGER OF AN APARTMENT
24 HOUSE, OR A CONTRACTOR HIRED BY THE OWNER, OPERATOR, OR MANAGER, MAY
25 NOT IMPOSE ON A UNIT IN THE FACILITY ANY COSTS ASSOCIATED WITH

26 LEAKS THAT THE OWNER,
27 OPERATOR, MANAGER, OR CONTRACTOR IS RESPONSIBLE FOR; OR

28 (II) COMMON AREA USAGE.

29 (4) THE OWNER, OPERATOR, OR MANAGER OF AN APARTMENT
30 HOUSE, OR A CONTRACTOR HIRED BY THE OWNER, OPERATOR, OR MANAGER, MAY
31 COLLECT AN ADDITIONAL SERVICE CHARGE NOT EXCEEDING **REASONABLE**
MARKET COSTS OF SUCH SERVICE PER UNIT PER
32 **MONTH TO COVER ADMINISTRATIVE COSTS AND BILLING AND MAY NOT CHARGE**
MORE THAN THE ACTUAL COSTS BILLED TO THE OWNER, OPERATOR, OR MANAGER
FOR THAT SERVICE.

1 (E) (1) EACH INDIVIDUAL **SUB** METER UNDER THIS SECTION IS SUBJECT
 2 TO THE REGULATIONS AND STANDARDS THAT THE DEPARTMENT, IN CONSULTATION
 3 WITH THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT, ADOPTS
 4 FOR THE ACCURACY, TESTING, AND RECORD KEEPING OF INDIVIDUAL **SUB** METERS.

5 (2) REGULATIONS ADOPTED UNDER THIS SUBSECTION SHALL BE
NO MORE
 6 STRINGENT **THAN** THE REGULATIONS APPLICABLE TO THE WATER METERS
 7 THAT WATER SERVICE PROVIDERS INSTALL.

(F) (1) **ALTERNATIVE BILLING METHODS FOR INDIVIDUAL SUB METERS**

8 (2) IN THE EVENT AN INDIVIDUAL SUB METER DOES NOT PROVIDE
 ADEQUATE OR ACCURATE DATA FOR BILLING, THE OWNER, OPERATOR,
 OR MANAGER MAY BILL THE UNIT THE AVERAGE COST OF THE LAST
 THREE MONTHS OF ACTUAL USAGE BY THE UNIT, OR IF THREE MONTHS
 OF USAGE IS NOT AVAILABLE, MAY BILL THE AVERAGE OF LAST THREE
 MONTHS OF THE SAME UNITE TYPE IN THE APARTMENT HOUSE.

33 (2A) IN THE EVENT OF A DOCUMENTED WATER LEAK, THE OWNER,
 OPERATOR, OR MANAGER MAY ONLY BILL THE UNIT THE AVERAGE
 COST OF THE LAST THREE MONTHS OF ACTUAL USAGE BY THE
 UNIT, OR IF THREE MONTHS OF USAGE IS NOT AVAILABLE, MAY
 BILL THE AVERAGE OF THE LAST THREE MONTHS OF THE SAME
 UNIT TYPE IN THE APARTMENT HOUSE.

(2B) IN THE EVENT THE INDIVIDUAL SUB METER MALFUNCTIONS OR IS
 NOT OPERATIONAL, THE OWNER, OPERATOR, OR MANAGER OF THE
 APARTMENT HOUSE MAY BILL THE UNIT THE AVERAGE COST OF THE
 LAST THREE MONTHS OF ACTUAL USAGE BY THE UNIT, OR IF THREE
 MONTHS OF USAGE IS NOT AVAILABLE, MAY BILL THE AVERAGE OF LAST
 THREE MONTHS OF THE SAME UNIT TYPE IN THE APARTMENT HOUSE.

(2C) IN THE EVENT OF A LEAK OR MALFUNCTION OF AN INDIVIDUAL SUB
 METER, THE OWNER, OPERATOR, OR MANAGER MAY ONLY USE THE
 BILLING METHODS 2A AND 2B FOR UP TO THREE CONSECUTIVE BILLING
 CYCLES IN ORDER TO REPAIR OR REPLACE THE INDIVIDUAL SUB METERS.
 AFTER THREE CONSECUTIVE BILLING CYCLES, IF THE METER IS NOT
 REPLACED OR REPAIRED, NO FURTHER BILLING MAY TAKE PLACE UNTIL
 SUCH INDIVIDUAL SUB METERS HAVE BEEN REPAIRED OR REPLACED.

1 (G) THE OWNER, OPERATOR, OR MANAGER OF THE APARTMENT HOUSE, OR
 2 A CONTRACTOR HIRED BY THE OWNER, OPERATOR, OR MANAGER, SHALL:

3 (1) MAINTAIN ADEQUATE RECORDS REGARDING INDIVIDUAL **SUB**
 4 METERS; AND

5 (2) ALLOW THE OCCUPANT OF THE UNIT TO INSPECT THE RECORDS
 6 DURING REASONABLE BUSINESS HOURS.

(H) (1) A COMPLAINT BY AN OCCUPANT OF A DWELLING UNIT AGAINST AN
 7

8 OWNER, OPERATOR, OR MANAGER OF AN APARTMENT HOUSE, OR A CONTRACTOR
9 HIRED BY THE OWNER, OPERATOR, OR MANAGER, UNDER THIS SECTION MAY BE
10 FILED IN THE COUNTY OR MUNICIPALITY WHERE THE APARTMENT HOUSE IS
11 LOCATED.

12 (2) A COMPLAINT FILED UNDER PARAGRAPH (1) OF THIS
13 SUBSECTION MAY BE HANDLED BY:

14 (I) THE LANDLORD-TENANT COMMISSION, IF ONE EXISTS, OF
15 THE COUNTY OR MUNICIPALITY;

16 (II) THE CONSUMER PROTECTION AGENCY, IF ONE EXISTS, OF
17 THE COUNTY OR MUNICIPAL CORPORATION IF THERE IS NOT A LANDLORD-TENANT

1 COMMISSION IN THE COUNTY OR MUNICIPALITY OR IF THE COMMISSION DOES NOT
2 HAVE JURISDICTION; OR

3 (III) THE CONSUMER PROTECTION DIVISION OF THE OFFICE OF
4 THE ATTORNEY GENERAL, IF THERE IS NOT A CONSUMER PROTECTION AGENCY IN
5 THE COUNTY OR MUNICIPALITY OR THE AGENCY DOES NOT HAVE JURISDICTION.

6 SECTION 2. AND BE IT FURTHER ENACTED, That this Act shall take effect
7 October 1, 2026.

MBIA Letter of Support with Amendments SB 130.pdf

Uploaded by: Lori Graf

Position: FWA

January 30th, 2026

The Honorable Brian J. Feldman
Chair, Senate Education, Energy and the Environment Committee
2 West Miller Senate Office Building
Annapolis, Maryland 21401

RE: MBIA Letter of Support with Amendments SB130 Environment – Water – Individual Unit Meters

Dear Chair Feldman,

The Maryland Building Industry Association, representing 100,000 employees of the building industry across the State of Maryland, appreciates the opportunity to participate in the discussion surrounding **SB130 Environment – Water – Individual Unit Meters**.

While we support some aspects of the bill, we would like the Committee to consider our proposed amendments. MBIA is concerned that using terms like “authorization” and “may” on page 3 feels vague and could eventually be interpreted as a requirement to install sub-meters. We would prefer clearer language that makes ensures the bill will not require an apartment house to install sub-meters.

Amendment #1

On page 1, lines 6-8, strike “requiring each individual unit meter to include a leak detection monitor; authorizing the occupant of a dwelling unit to periodically inspect the leak detection monitor installed for their unit” and insert “requiring the owner, operator, or manager to maintain the individual sub meters in working order”

Amendment #2

On page 1, line 12, strike “unit” and insert “sub” after “water”

Amendment #3

On page 2, line 26, strike “unit” and insert “sub”

Amendment #4

On page 3, line 7, strike “unit” and insert “sub”

Amendment #5

On page 3, line 11, after “individual” strike “unit” and insert “sub”

Amendment #6

On page 3, line 11, strike “individually” and insert “direct”

Amendment #7

On page 3, line 16, strike “unit” and insert “sub”

Amendment #8

On page 3, line 31, strike "\$1" and insert "reasonable market costs of such service"

Amendment #9

On page 3, line 32, after "billing" insert "and may not charge more than the actual costs billed to the owner, operator, or manager"

Amendment #10

On page 4, line 1, strike "unit" and insert "sub"

Amendment #11

On page 4, line 4, strike "unit" and insert "sub"

Amendment #12

On page 4, lines 8 and 9, strike "each individual unit meter under this section shall 8 include a leak detection monitor" and insert "alternative billing methods for individual sub meters"

Amendment #13

On page 4, lines 10 through 13, strike "the owner, operator, or manager of the apartment house, or a contractor hired by the owner, operator, or manager, shall allow the occupant of the unit to periodically inspect the leak detection monitor" and insert "(2) In the event an individual sub meter does not provide adequate or accurate data for billing, the owner, operator, or manager may bill the unit the average cost of the last three months of actual usage by the unit, or if three months of usage is not available, may bill the average of last three months of the same size units in the apartment house" after, add "(2a) In the event of a documented water leak, the owner, operator, or manager may only bill the unit the average cost of the last three months of actual usage by the unit, or if three months of usage is not available, may bill the average of the last three months of the same size units in the apartment house," "(2b) In the event the individual sub meter malfunctions or is not operational, the owner, operator, or manager of the apartment house may bill the unit the average cost of the last three months of actual usage by the unit, or if three months of usage is not available, may bill the average of last three months of the same size units in the apartment house." "(2c) In the event of a leak or malfunction of an individual sub meter, the owner, operator, or manager may only use the billing methods 2a and 2b for up to three consecutive billing cycles in order to repair or replace the individual sub meters. After three consecutive billing cycles, if the meter is not replaced or repaired, no further billing may take place until such individual sub meters have been repaired or replaced.

Amendment #14

On page 4, line 16, strike "unit" and insert "sub"

For these reasons, MBIA respectfully requests the Committee to consider our proposed amendments. Thank you for your consideration.

For more information about this position, please contact Lori Graf at 410-800-7327 or lgraf@marylandbuilders.org.

cc: Members of the Senate Education, Energy, and the Environment Committee

SB 130 - Water Meters and Billing - NAIOP Hearing

Uploaded by: Tom Ballentine

Position: FWA

NAIOP

MARYLAND CHAPTERS



THE ASSOCIATION FOR
COMMERCIAL REAL ESTATE

January 30, 2026

The Honorable Brian J. Feldman, Chair
Senate Education, Energy, and the Environment Committee
2 West Senate Office Building
Annapolis, Maryland 21401

Support w/ Amendments: SB 130 – Water – Individual Unit Meters and Billing

Dear Chair, Feldman and Committee Members:

The NAIOP Maryland Chapters represent approximately 700 companies involved in all aspects of commercial, industrial, and mixed-use real estate. On behalf of our member companies, I am writing to support with amendments SB 130 which would establish requirements for submetering, billing, and recordkeeping related to water use in residential rental properties.

While we appreciate the intent to promote accuracy and fairness in water billing, we believe the bill needs amendments in areas where it imposes requirements beyond what is necessary to achieve these goals. The changes also make the bill more consistent with similar requirements related submetering of gas and electrical service in the Utilities Article. added that are not part of the We have attached an unofficial reprint of the bill marked with requested amendments. The amendments are related to:

➤ **Record Retention**

- Shortening the record retention window from 2 years to 12 months.
- Removing requirements to retain and make available for inspection total building utility costs and the utility costs collected from other occupants.
- Removing vague, open ended information retention language.

➤ **Meter Equipment**

- Clarifying that regulations adopted for submeters are no more stringent than the regulations for the master meters installed by the water utility to provide primary service to the building.
- Removing the requirement that each unit have a leak detection monitor due to questionable effectiveness in an apartment building.

➤ **Cost Recovery**

- Allowing the building owner to pass through reasonable, market-rate administrative costs.
- Establishing a methodology for billing in the event that submeters malfunction.
- Making the requirements consistent with existing gas and electric metering provisions by removing the prohibition on treating unpaid water bills as unpaid rent.

NAIOP respectfully recommends your favorable w/ amendments report on SB 130.

Sincerely,

Tom Ballentine, Vice President for Policy
NAIOP – Maryland Chapters, *The Association for Commercial Real Estate*

cc: Education, Energy, and the Environment Committee Members
Nick Manis – Manis, Canning Assoc.

HOUSE BILL 220

M3, N1

(PRE-FILED)

6lr1505
CF SB 130

By: **Delegate Charkoudian**

Requested: October 30, 2025

Introduced and read first time: January 14, 2026

Assigned to: Environment and Transportation

A BILL ENTITLED

1 AN ACT concerning

2 **Environment – Water – Individual Unit Meters**

3 FOR the purpose of authorizing the installation of individual ~~unit~~sub water meters for
4 certain

5 apartment houses and dwelling units; prohibiting the owner, operator, or manager
6 of an apartment house, or a contractor hired by the owner, operator, or manager,
7 from imposing certain costs on a unit; ~~requiring each individual unit meter to include~~
~~8 a leak detection monitor; authorizing the occupant of a dwelling unit to periodically~~
~~9 inspect the leak detection monitor installed for their unit; requiring the~~
~~10 owner, operator, or manager to maintain the individual~~
~~11 sub meters in working order, requiring the owner,~~

~~12 operator, or manager of an apartment house, or a contractor hired by the owner,~~
~~13 operator, or manager to maintain certain records; prohibiting unpaid water bills~~
~~14 from being treated as unpaid rent in an eviction process; establishing a certain~~
~~15 complaint process; and generally relating to individual ~~unit~~ water sub meters.~~

~~16~~ BY adding to

~~17~~ Article – Environment

~~18~~ Section 9–1115

~~19~~ Annotated Code of Maryland

~~20~~ (2014 Replacement Volume and 2025 Supplement)

~~21~~ SECTION 1. BE IT ENACTED BY THE GENERAL ASSEMBLY OF MARYLAND,

~~22~~ That the Laws of Maryland read as follows:

20 **Article – Environment**

21 **9–1115.**

22 **(A) (1) IN THIS SECTION THE FOLLOWING WORDS HAVE THE MEANINGS**
23 **INDICATED.**

[Brackets] indicate matter deleted from existing law.

hb0220

1 (2) “ADEQUATE RECORDS” INCLUDES:

2 (I) A COPY OF ALL CHARGES THAT THE WATER SERVICE
3 PROVIDER IMPOSED ON THE OWNER, OPERATOR, OR MANAGER OF AN APARTMENT
4 HOUSE IN THE PRECEDING ~~2 YEARS~~ 12 MONTHS; AND;

~~5 (II) THE TOTAL UTILITY COST IMPOSED ON ALL UNITS IN THE
6 FACILITY EACH MONTH FOR THE CURRENT CALENDAR YEAR
7 AND PREVIOUS
8 CALENDAR YEAR;~~

~~8 (III) THE TOTAL REVENUE COLLECTED FROM OCCUPANTS TO
9 PAY THE CHARGES IMPOSED ON THE OWNER, OPERATOR, OR MANAGER BY THE
10 WATER SERVICE PROVIDER EACH MONTH FOR THE CURRENT CALENDAR YEAR AND
11 PREVIOUS CALENDAR YEAR;~~

~~125 (II)(IV) AN EXPLANATION OF THE FORMULA USED TO
136 ALLOCATE
136 THE COST OF EACH UNIT’S WATER CONSUMPTION; AND~~

~~14 (V) ANY OTHER INFORMATION NECESSARY FOR A TENANT TO
15 VERIFY A WATER UTILITY BILL.~~

~~167 (3) (I) “APARTMENT HOUSE” MEANS ONE OR MORE BUILDINGS
178 THAT EACH CONTAIN MORE THAN TWO DWELLING UNITS AND IN WHICH ALL THE
189 DWELLING UNITS ARE OCCUPIED PRIMARILY FOR NONTRANSIENT USE WITH RENT
1910 PAID AT INTERVALS OF 1 WEEK OR LONGER.~~

~~2011 (II) “APARTMENT HOUSE” INCLUDES A RESIDENTIAL
2112 CONDOMINIUM OR COOPERATIVE, WHETHER THE UNITS ARE RENTED OR OWNER
2213 OCCUPIED.~~

~~2314 (4) “DWELLING UNIT” MEANS PREMISES THAT CONSIST OF ONE OR
2415 MORE ROOMS SUITABLE FOR OCCUPANCY AS A RESIDENCE AND THAT CONTAIN
2516 KITCHEN AND BATHROOM FACILITIES.~~

~~2617 (5) “INDIVIDUAL UNITSUB METER” MEANS
2718 EQUIPMENT USED TO
2819 DETERMINE THE ACTUAL USE OF WATER FOR EACH RESIDENTIAL UNIT IN AN
2819 APARTMENT HOUSE.~~

~~2920 (6) “WATER SERVICE PROVIDER” MEANS, AS APPLICABLE:~~

~~3021 (I) A POLITICAL SUBDIVISION THAT PROVIDES WATER AND
3122 SEWERAGE SERVICES UNDER SUBTITLE 7 OF THIS TITLE;~~

1 (II) A WATER COMPANY, AS DEFINED IN § 1-101 OF THE PUBLIC
2 UTILITIES ARTICLE; OR

3 (III) THE WASHINGTON SUBURBAN SANITARY COMMISSION.

4 (B) SUBJECT TO THE PROVISIONS OF THIS SECTION, AND WITH THE
5 APPROVAL OF THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT, A
6 LOCAL HOUSING AUTHORITY ESTABLISHED UNDER DIVISION II OF THE HOUSING
7 AND COMMUNITY DEVELOPMENT ARTICLE MAY INSTALL INDIVIDUAL UNIT-SUB
8 METERS

FOR ANY COMBINATION OF APARTMENT HOUSES OR DWELLING UNITS.

9 (C) AN OWNER, AN OPERATOR, OR A MANAGER OF AN APARTMENT HOUSE,
10 OR A CONTRACTOR HIRED BY THE OWNER, OPERATOR, OR MANAGER, MAY INSTALL
11 AN INDIVIDUAL UNIT-SUB METER FOR EACH DWELLING UNIT THAT IS NOT
12 INDIVIDUALLY DIRECT
13 METERED FOR WATER TO ALLOCATE FAIRLY THE COST OF EACH UNIT'S WATER
CONSUMPTION.

14 (D) (1) AN OWNER, AN OPERATOR, OR A MANAGER OF AN APARTMENT
15 HOUSE, OR A CONTRACTOR HIRED BY THE OWNER, OPERATOR, OR MANAGER, WHO
16 INSTALLS INDIVIDUAL UNIT-SUB METERS UNDER THIS SECTION TO PROVIDE
17 BULK
18 METERED SERVICE MAY NOT IMPOSE ON A UNIT IN THE FACILITY ANY WATER OR
19 SEWERAGE COST EXCEPT THE CHARGES THAT THE WATER SERVICE PROVIDER
ACTUALLY IMPOSES ON THE OWNER, OPERATOR, OR MANAGER.

20 (2) THE CHARGES IMPOSED UNDER PARAGRAPH (1) OF THIS
21 SUBSECTION SHALL BE ALLOCATED AMONG-THE-TO-EACH UNITS IN
22 PROPORTION TO THE
ACTUAL USAGE BY THE-THAT UNIT.

23 (3) THE OWNER, OPERATOR, OR MANAGER OF AN APARTMENT
24 HOUSE, OR A CONTRACTOR HIRED BY THE OWNER, OPERATOR, OR MANAGER, MAY
25 NOT IMPOSE ON A UNIT IN THE FACILITY ANY COSTS ASSOCIATED WITH:

26 (I) POOR-MAINTENANCE OR LEAKS THAT THE OWNER,
27 OPERATOR, MANAGER, OR CONTRACTOR IS RESPONSIBLE FOR; OR

28 (II) COMMON AREA USAGE.

29 (4) THE OWNER, OPERATOR, OR MANAGER OF AN APARTMENT
30 HOUSE, OR A CONTRACTOR HIRED BY THE OWNER, OPERATOR, OR MANAGER, MAY
31 COLLECT AN ADDITIONAL SERVICE CHARGE NOT EXCEEDING \$1-REASONABLE
32 MARKET COSTS OF SUCH SERVICE PER UNIT PER
MONTH TO COVER ADMINISTRATIVE COSTS AND BILLING AND MAY NOT CHARGE

MORE THAN THE ACTUAL COSTS BILLED TO THE OWNER, OPERATOR, OR MANAGER FOR THAT SERVICE.

1 (E) (1) EACH INDIVIDUAL ~~UNIT~~SUB METER UNDER THIS SECTION IS
 2 SUBJECT
 3 TO THE REGULATIONS AND STANDARDS THAT THE DEPARTMENT, IN CONSULTATION
 4 WITH THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT, ADOPTS
 5 FOR THE ACCURACY, TESTING, AND RECORD KEEPING OF INDIVIDUAL ~~UNIT~~SUB
 6 METERS.

7 (2) REGULATIONS ADOPTED UNDER THIS SUBSECTION SHALL BE ~~AT~~
 8 ~~LEAST AS~~ NO MORE STRINGENT ~~AS~~ THAN THE REGULATIONS APPLICABLE TO THE WATER
 9 METERS
 10 THAT WATER SERVICE PROVIDERS INSTALL.

11 ~~(F) (1) EACH INDIVIDUAL UNIT METER UNDER THIS SECTION SHALL~~
 12 ~~INCLUDE A LEAK DETECTION MONITOR. ALTERNATIVE BILLING METHODS FOR~~
 13 ~~INDIVIDUAL SUB METERS~~

14 ~~(2) IN THE EVENT AN INDIVIDUAL SUB METER DOES NOT PROVIDE~~
 15 ~~ADEQUATE OR ACCURATE DATA FOR BILLING, THE OWNER, OPERATOR,~~
 16 ~~OR MANAGER MAY BILL THE UNIT THE AVERAGE COST OF THE LAST~~
 17 ~~THREE MONTHS OF ACTUAL USAGE BY THE UNIT, OR IF THREE MONTHS~~
 18 ~~OF USAGE IS NOT AVAILABLE, MAY BILL THE AVERAGE OF LAST THREE~~
 19 ~~MONTHS OF THE SAME ~~SIZE UNITS~~ UNITE TYPE IN THE APARTMENT~~
 20 ~~HOUSE. THE OWNER, OPERATOR, OR MANAGER OF THE APARTMENT~~
 21 ~~HOUSE, OR A CONTRACTOR HIRED BY THE OWNER, OPERATOR, OR~~
 22 ~~MANAGER, SHALL~~
 23 ~~ALLOW THE OCCUPANT OF THE UNIT TO PERIODICALLY INSPECT~~
 24 ~~THE LEAK~~
 25 ~~DETECTION MONITOR.~~

26 ~~(2A) IN THE EVENT OF A DOCUMENTED WATER LEAK, THE OWNER,~~
 27 ~~OPERATOR, OR MANAGER MAY ONLY BILL THE UNIT THE AVERAGE COST~~
 28 ~~OF THE LAST THREE MONTHS OF ACTUAL USAGE BY THE UNIT, OR IF~~
 29 ~~THREE MONTHS OF USAGE IS NOT AVAILABLE, MAY BILL THE AVERAGE~~
 30 ~~OF THE LAST THREE MONTHS OF THE SAME ~~SIZE UNITS~~ UNIT TYPE IN~~
 31 ~~THE APARTMENT HOUSE.~~

~~(2B) IN THE EVENT THE INDIVIDUAL SUB METER MALFUNCTIONS OR IS~~
~~NOT OPERATIONAL, THE OWNER, OPERATOR, OR MANAGER OF THE~~
~~APARTMENT HOUSE MAY BILL THE UNIT THE AVERAGE COST OF THE~~
~~LAST THREE MONTHS OF ACTUAL USAGE BY THE UNIT, OR IF THREE~~
~~MONTHS OF USAGE IS NOT AVAILABLE, MAY BILL THE AVERAGE OF LAST~~
~~THREE MONTHS OF THE SAME ~~SIZE UNITS~~ UNIT TYPE IN THE~~
~~APARTMENT HOUSE.~~

~~(2C) IN THE EVENT OF A LEAK OR MALFUNCTION OF AN INDIVIDUAL SUB~~
~~METER, THE OWNER, OPERATOR, OR MANAGER MAY ONLY USE THE~~
~~BILLING METHODS 2A AND 2B FOR UP TO THREE CONSECUTIVE BILLING~~

CYCLES IN ORDER TO REPAIR OR REPLACE THE INDIVIDUAL SUB METERS. AFTER THREE CONSECUTIVE BILLING CYCLES, IF THE METER IS NOT REPLACED OR REPAIRED, NO FURTHER BILLING MAY TAKE PLACE UNTIL SUCH INDIVIDUAL SUB METERS HAVE BEEN REPAIRED OR REPLACED.

141 (G) THE OWNER, OPERATOR, OR MANAGER OF THE APARTMENT HOUSE, OR
152 A CONTRACTOR HIRED BY THE OWNER, OPERATOR, OR MANAGER, SHALL:

163 (1) MAINTAIN ADEQUATE RECORDS REGARDING INDIVIDUAL
UNITSUB
174 METERS; AND

185 (2) ALLOW THE OCCUPANT OF THE UNIT TO INSPECT THE RECORDS
196 DURING REASONABLE BUSINESS HOURS.

~~20 (H) UNPAID WATER BILLS UNDER THIS SECTION MAY NOT BE TREATED AS
21 UNPAID RENT IN AN EVICTION PROCEEDING.~~

227 (H) (1) A COMPLAINT BY AN OCCUPANT OF A DWELLING UNIT AGAINST AN
238 OWNER, OPERATOR, OR MANAGER OF AN APARTMENT HOUSE, OR A CONTRACTOR
249 HIRED BY THE OWNER, OPERATOR, OR MANAGER, UNDER THIS SECTION MAY BE
2510 FILED IN THE COUNTY OR MUNICIPALITY WHERE THE APARTMENT HOUSE IS
2611 LOCATED.

2712 (2) A COMPLAINT FILED UNDER PARAGRAPH (1) OF THIS
2813 SUBSECTION MAY BE HANDLED BY:

2914 (I) THE LANDLORD-TENANT COMMISSION, IF ONE EXISTS, OF
3015 THE COUNTY OR MUNICIPALITY;

3116 (II) THE CONSUMER PROTECTION AGENCY, IF ONE EXISTS, OF
3217 THE COUNTY OR MUNICIPAL CORPORATION IF THERE IS NOT A LANDLORD-TENANT

1 COMMISSION IN THE COUNTY OR MUNICIPALITY OR IF THE COMMISSION DOES NOT
2 HAVE JURISDICTION; OR

3 (III) THE CONSUMER PROTECTION DIVISION OF THE OFFICE OF
4 THE ATTORNEY GENERAL, IF THERE IS NOT A CONSUMER PROTECTION AGENCY IN
5 THE COUNTY OR MUNICIPALITY OR THE AGENCY DOES NOT HAVE JURISDICTION.

6 SECTION 2. AND BE IT FURTHER ENACTED, That this Act shall take effect
7 October 1, 2026.

SB 130_realtors_unf.pdf

Uploaded by: William Castelli

Position: UNF



Senate Bill 130 – Environment – Water – Individual Unit Meters

Position: Unfavorable

The REALTORS® oppose SB 130 which, among other provisions, appears to empower local housing authorities to install water meters on certain private property without consent of the owner.

As drafted, the legislation states that the Department of Housing and Community Development (DHCD) or a local housing authority “MAY INSTALL INDIVIDUAL UNIT METERS FOR ANY COMBINATION OF APARTMENT HOUSES OR DWELLING UNITS.” The legislation does not specify that this authority is only limited to state financed housing or publicly owned property.

Although the legislation does not indicate that owners would have to reimburse DHCD or the local housing authority for the expense of installing the meters, the owners should have control over their property and expensive capital improvements that impact the operation of the building and tenants.

Finally, while the legislation seeks to allocate water costs more fairly among tenants, it doesn't address another fairness issue: the account for the leased property's water bill is connected to the property itself rather than the bill payer. As a result, when water fees are not paid, the owner of the dwelling unit, rather than the tenant who may have been paying the bill directly, is saddled with any unpaid fees and penalties.

The REALTORS® believe this legislation should be explicitly limited to State or local publicly owned property.

**For more information contact lisa.may@mdrealtor.org or
christa.mcgee@mdrealtor.org**

SB 130_Consumer Protection Division_Information_FI

Uploaded by: Kira Wilpone-Welborn

Position: INFO

CAROLYN A. QUATTROCKI
Chief Deputy Attorney General

LEONARD J. HOWIE III
Deputy Attorney General

CARRIE J. WILLIAMS
Deputy Attorney General

SHARON S. MERRIWEATHER
Deputy Attorney General

ZENITA WICKHAM HURLEY
Deputy Attorney General



**STATE OF MARYLAND
OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION
HOUSING UNIT**

ANTHONY G. BROWN
Attorney General

WILLIAM D. GRUHN
Division Chief

KAREN M. VALENTINE
Deputy Division Chief

PETER V. BERNS
General Counsel

CHRISTIAN E. BARRERA
Chief of Staff

KIRA WILPONE-WELBORN
Unit Chief

January 30, 2026

To: The Honorable Brian J. Feldman
Chair, Education, Energy, and the Environment Committee

From: Kira Wilpone-Welborn, Assistant Attorney General
Consumer Protection Division

Re: Senate Bill 130—Environment - Water - Individual Unit Meters (LETTER OF
INFORMATION)

Senate Bill 130, sponsored by Senator Shaneka Henson, permits an owner, operator, or manager of an apartment complex to install individual water meters that would measure an occupant's actual usage of water and sewer. If an owner, operator, or manager installs individual water meters then they may only pass on charges they incur from the water service provider and an operation fee that may not exceed \$1.00. The bill permits occupants with complaints about the use and record retention of individual water meters to submit complaints to the Consumer Protection Division ("Division"), if there is no consumer protection agency in the county or municipality or the agency lacks jurisdiction, among others. Finally, the bill requires the Department of the Environment and the Department of Housing and Community Development to develop regulations on the use and testing of individual water meters.

The Division typically reserves comment on bills that impose obligations on sister State agencies. However, the Division wants to clarify for the Committee that the Division already receives and mediates landlord-tenant complaints, which are consistently among the top complaints received each year by the Division, including complaints about how tenants are billed for utilities. Specifically, the Consumer Protection Act mandates that the Division "take strong protective and preventive steps to investigate unlawful consumer practices, to assist the public in obtaining relief from these practices, and to prevent these practices from occurring in Maryland." Com. Law § 13-102. As such, the Division mediates and investigates complaints from Maryland

consumers regarding unfair, abusive, and deceptive trade practices, including complaints about how tenants are billed for utilities, and seeks to remediate violations of the Act through enforcement actions. Senate Bill 130 would provide an alternative basis for the Division to receive, mediate and investigate complaints about how tenants are billed for utilities.

cc: The Honorable Shaneka Henson
Members, Education, Energy, and the Environment Committee