

February 4, 2025

The Honorable Kriselda Valderrama  
Chair, Economic Committee  
6 Bladen Street  
Annapolis, Maryland 21401

**RE: MBIA Letter of Support with Amendments HB220 Environment – Water – Individual Unit Meters**

Dear Chair Valderrama

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 **HB220 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 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](mailto:lgraf@marylandbuilders.org).

cc: Members of the House Economic Matters Committee