

NAVIGATING SUBMETERING LAWS IN MANUFACTURED HOUSING

Avoid Fines, Refunds, and Lawsuits:
Submetering Laws Explained for MH Operators

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Protect Your Revenue. Stay Compliant. Reduce Risk.

Mobile home parks often have master-metered utilities that are resold to residents via submeters. Operators must follow specific laws to ensure billing is fair and legal.

But here's the challenge: submetering laws vary drastically by state, are frequently updated, and carry costly penalties when misapplied. From fee caps to transparency requirements, even small errors in your billing practices can trigger lawsuits, regulatory fines, or forced refunds—eroding your NOI and credibility with residents.

At ManageAmerica, we help community owners and operators uncover hidden risks, implement compliant billing practices, and simplify submetering across multiple jurisdictions.

In This Whitepaper, You'll Learn:

- ✓ **Core Requirements for Submetering Compliance**
What every MH operator must follow—no matter the state
- ✓ **Fee Caps and Cost Pass-Through Rules**
Where you can (and can't) charge admin fees—and how much
- ✓ **Real Regulatory Risks**
Fines, refunds, and lawsuits that have cost operators millions
- ✓ **State-by-State Highlights**
Quick summaries for key states like Florida, Texas, California, Arizona, and North Carolina
- ✓ **Real Regulatory Risks**
Actionable steps + how ManageAmerica can help monitor and recertify your rates monthly





Core Submetering Law Requirements for Manufactured Housing

Understand the foundational legal standards that govern how utilities must be billed in manufactured housing communities to ensure fairness, accuracy, and compliance across your portfolio.



Property managers of manufactured housing communities (MHCs) should be aware that **submetering** – individually metering and billing residents for utilities – is governed primarily by state laws and regulations. While rules vary by state, several key requirements are common across most U.S. jurisdictions:

State Authorization & Compliance

- Submetering is generally allowed only under state law or public utility commission regulations - [huduser.gov](https://www.huduser.gov).
- States often have enabling laws that outline how landlords or park owners may install submeters and bill residents.
- In some states, silence in the law might be interpreted to mean allowance, whereas in others it's tacitly not allowed with conditions- [huduser.gov](https://www.huduser.gov).

Always check your state's statutes or utility commission rules before implementing submetering.

No Profit on Resold Utilities

Nearly all states prohibit landlords from charging residents more for a utility than the owner actually paid the utility provider. In other words, you **cannot mark up or profit from reselling water, sewer, electricity, or gas**. The resale rate must not exceed the utility's rate and charges.

For example:

- Florida law explicitly forbids a park owner from **demanding any amount** greater than the utility's charge when reselling electricity, gas, or water to residents - [law.justia.com](https://www.law.justia.com)
- For example, Arizona law for land-lease mobile homes (A.R.S. §33-1413.01) prohibits charging residents more than the landlord's cost from the utility provider.

This ensures residents pay essentially the same amount they would if billed directly by the public utility.



Allowed Administrative Fees (Caps Apply)

Many states permit a small administrative fee, customer charge, or service charge to cover the owner's billing expenses – but these fees are tightly regulated. Typical limitations include either a fixed dollar cap or a percentage of the utility cost.

For instance:

- Arizona allows an admin fee only for actual costs and caps it at **10% of the utility charges** per month - [ncsl.org](https://www.ncsl.org)
- Texas authorizes a service fee up to **9% of the water bill** for submetered water service - codes.findlaw.com
- North Carolina's utility commission caps billing fees at **\$3.75 per month** - [Rule R18-6](#)
- California recently set its cap for water billing at the lesser of **\$5.65 or 25%** of the customer's usage charge - legiscan.com

Operators should carefully adhere to their state's fee limits – any amount beyond what is allowed is typically deemed an illegal profit.

Disclosure and Billing Transparency

Submetering laws usually require clear disclosure to residents. Lease or rental agreements must spell out which utilities will be billed separately and how those charges are calculated - [ncsl.org](https://www.ncsl.org). In practice, each monthly bill to the resident should itemize the utility usage and cost to that resident. Many states mandate showing the current utility's rate schedule or meter readings on the bill.



For example, California's Mobile Home Residency Law requires that when a manufactured housing community bills for utilities via submeters, the **exact rates charged by the utility provider** must be provided or posted for residents - ncsl.org/ncsl.org, and each resident bill must list the opening/closing meter readings and the charges for that period to each resident - sjud.senate.ca.gov. Transparency builds trust and is often legally required.

Meter Accuracy and Standards

Since the resident's charges depend on the submeter readings, **meter accuracy is crucial**. States commonly require that submeter devices meet the same standards as utility-grade meters. Submeters may need to be tested and sealed or approved by state weights and measures authorities.

For example:

- In Texas, all submetering equipment is subject to utility commission standards for accuracy, testing, and record-keeping - codes.findlaw.com.
- California certifies water submeters through a state program to ensure they meet accuracy specs - tehamawireless.com.
- California also requires that 10% of the meters are replaced each year.

Managers should use properly certified meters and maintain them, as faulty measurements can lead to disputes and compliance violations.

Fair Billing Practices

Submetering laws often include consumer protections. If a submetered system fails or a reading is questionable, some states limit how bills can be estimated. Many jurisdictions also require that common area usage (e.g. water for landscaping) is not passed on to residents, and that each resident is only billed for their own measured usage or a fair share of communal charges.



California's law explicitly forbids charging mobile home residents for **water used by the park's common areas** or others – only the homeowner's own usage can be billed - legiscan.com. Likewise, if there are fixed service fees from the utility (like a base meter charge), those must be allocated fairly (often equally or by proportion) among residents or charged according to statute.

In summary, **most states require that submetering be a purely pass-through billing arrangement**: residents pay for what they use, at cost, with at most a nominal fee for billing expenses. Any deviation – such as hidden markups, inflated “service” fees, or opaque billing – can run afoul of state laws that protect residents from utility overcharges - huduser.gov.





Federal vs. State Oversight: Who Regulates Submetering in MH Communities?

While submetering is primarily regulated at the state level, understanding the limited federal role and how oversight varies by jurisdiction is key to staying compliant.



There is **no broad federal statute** that directly governs utility submetering in private manufactured housing communities – regulation is left to the states. The federal government does, however, encourage individualized metering in certain contexts.

For instance, HUD regulations (24 CFR 965) require individual meters in public housing projects whenever feasible, to promote conservation - [huduser.gov](https://www.huduser.gov). But these rules apply to federally subsidized housing and not to private MHC operators in general.

Instead of a single national law, federal influence comes indirectly through standards and best practices. The **National Institute of Standards and Technology (NIST)** and industry groups set technical standards for meters (ensuring accuracy and reliability) which states often adopt.

For example, electric and water submeters typically must comply with NIST Handbook 44 requirements or the equivalent, and many states reference these in their regulations. This means that no matter where your community is located, using **properly certified submeter devices** and following standard metering practices is essential.

In short, **submetering compliance is a state-by-state matter** - [huduser.gov](https://www.huduser.gov). Manufactured housing community owners should familiarize themselves with their specific state's submetering statutes or public service commission rules. Federal law will not preempt state requirements here, except in narrow cases (like HUD housing or certain energy-efficiency mandates for new construction).

When in doubt, consult state law – and if none exists, be cautious: some states treat silence as an implication that landlords cannot resell utilities without being regulated as a utility company - [huduser.gov](https://www.huduser.gov).





Legal & Financial Risks of Submetering Law Violations

Non-compliance can lead to costly refunds, lawsuits, regulatory penalties, and reputational damage, making legal alignment a critical part of utility billing strategy.



Resident Lawsuits and Refunds

Residents who are overcharged or improperly billed can take legal action. Often, if a landlord violated a utility billing law, the remedy is that residents are entitled to reimbursement of the overcharges (sometimes with interest or penalties).

In some cases, large-scale violations trigger class action lawsuits or government enforcement. For example, in Washington State an investigation by the Attorney General found a park owner charging improper utility fees, resulting in **\$5.5 million in refunds** issued to thousands of residents - cascadepbs.org.

The refunded charges included “**utilities... assessed during the term of a rental agreement**” that were not allowed, meaning residents got back all fees that exceeded actual costs - cascadepbs.org. Such outcomes show that residents can and will seek redress if they suspect profiteering or unlawful billing.

Disclosure and Billing Transparency

State regulatory bodies (utility commissions or consumer protection agencies) may impose fines for submetering violations. In highly regulated states (like North Carolina), billing residents for water without the required certificate or charging illegal fees can lead to regulatory enforcement actions. Some state laws authorize civil penalties per violation or per day of continued non-compliance.

Additionally, in some states like Colorado, regulators can order a landlord to **cease improper billing practices** and correct them - which might mean reverting to including utilities in rent or obtaining a permit to submeter properly. The **risk of being deemed an unlicensed utility provider** is real if you charge beyond statutory limits.



In extreme cases, a state could require an MHC owner to become a regulated utility provider or halt billing residents for utilities altogether - huduser.gov.

- **Loss of Licenses or Other Sanctions:** Many states require MHC operators to maintain certain licenses or registrations (often through state housing departments or attorney general programs). Violating landlord-resident or utility laws can jeopardize these licenses. For instance, Washington's Dispute Resolution Program noted some park owners failed to [register communities as required by law](#), and it sought authority to fine those who don't comply- cascadepbs.org. While this is a specific example, it highlights that compliance issues can tangentially affect an operator's standing to do business. Moreover, a pattern of legal violations can invite stricter scrutiny on all aspects of the community's operations.
- **Eviction and Rent Implications:** Improper utility charges can undermine a landlord's claims against residents. If a resident withholds payment of an unlawfully high utility bill, a court might side with the resident, potentially barring an eviction for non-payment in that scenario. Additionally, in rent-controlled environments (like some California cities), improper separate utility billing without the corresponding rent reduction can violate rent control ordinances - mhphoa.com. This can lead to legal challenges or rent rollbacks. Essentially, illegal submetering practices complicate your ability to enforce leases and collect payments legitimately.

Non-compliance not only risks financial loss (through refunds and fines) but can damage your reputation and relationship with residents. It's far better to set up your submetering program correctly from the start than to face disputes or enforcement actions later.

Lawsuits, AG investigations, and media exposure (as seen in some states) have targeted landlords who appeared to be exploiting utility billing - cascadepbs.org. To avoid these risks, always charge within legal limits, keep impeccable records, and be transparent with residents.





Understanding Profit Limits & Admin Fee Caps on Utility Resale

Most states prohibit profiting from utility resale—learn how to navigate admin fee caps and ensure your billing practices reflect true cost recovery.



One of the most important facets of submetering laws is the restriction on profits. Virtually all states bar community owners from turning utility billing into a profit center. The operator's role is meant to be that of an agent passing through the cost of utilities, not an independent utility retailer. Here are common rules regarding charges and fees:

- **Utility Charges at Cost:** As noted, you must charge residents only what the utility company charges you for each resident's usage (plus applicable taxes). If the electric company charges \$0.10 per kWh, you charge the same \$0.10 per kWh to the homeowner - no surcharges. If the city charges \$500 total for water for the whole park for a month, you may divide that among residents based on their metered usage, but you cannot tack on extra usage charges. Many states write this explicitly into law. For example, Florida's regulations state that any fees collected for submetered electricity "shall be determined in a manner which reimburses [the owner] for no more than the actual cost of electricity" billed by the utility - [ncsl.org](https://www.ncsl.org). In short, the landlord cannot make money on the commodity itself.
- **Administrative Fee (if allowed):** To compensate for reading meters and billing, some states allow an additional fee - but **these are strictly limited**. Common approaches are either a flat monthly fee (e.g. a few dollars per bill) or a small percentage of the usage charge. States set different caps:
 - **Fixed-dollar caps:** North Carolina allows up to \$3.75 per month as an admin fee for water/sewer billing and prohibits any other service charges or late fees in submetered arrangements. California now caps mobile home park water billing fees to a maximum of \$4.75 (adjusted for inflation) per month - legiscan.com.
 - **Percentage caps:** Arizona and Texas use a percentage model. Florida allows recovery of actual administrative and maintenance costs, as long as they are reasonable and disclosed...



- ...Texas authorizes a service fee not exceeding 9% of the water costs billed to the resident - [codes.find](#). These percentages function similarly to a cap – they limit the fee relative to the bill size, preventing excessive add-ons.
- **Actual cost recovery:** A few states simply say you can charge *actual administrative costs* and nothing more. In practice this means the fee should reflect real expenses (billing software, meter reading labor, postage, etc.) and might be scrutinized if clearly padded. Some states, like Virginia, permit landlords to recover actual, documented administrative expenses but no more. Fees must reflect real costs like billing software, meter reading labor, or postage, and they must be clearly disclosed. Florida allows mobile home park owners to recoup **actual maintenance and administrative costs for water distribution** - [law.justia.com](#) – implying you could charge a separate line item for water system upkeep and billing, but it must be reasonable and tied to real costs.

It's worth noting that **some states do not allow any additional fee at all** – requiring the park owner to absorb billing costs as part of doing business **or fold them into your next rent increase**. Always check your state's rule: if it isn't explicitly authorized, assume you cannot charge an extra billing fee. Also, if you do charge an admin fee, it often must be clearly identified on the bill (and sometimes how it was calculated).

By staying within the permitted fee limits, operators avoid turning a lawful utility reimbursement into an unlawful profit scheme. The difference between a \$3 administrative fee and a \$10 markup might not seem huge monthly, but to regulators and courts it's the difference between compliance and violation. **In summary: recover your costs if allowed, but do not expect utility billing to generate profit.** Any attempt to charge more than allowed (even by creative labels) can result in having to refund those amounts later under legal scrutiny - [cascadepbs.org](#).





State-Specific Submetering Laws & Distinctive Requirements

Most states prohibit profiting from utility resale. Learn how to navigate admin fee caps and ensure your billing practices reflect true cost recovery.



While the core principles are similar, it's crucial to understand the distinctive [submetering laws in states with large numbers of manufactured home communities](#). Below we highlight key compliance points in five major MHC states – Florida, Texas, California, Arizona, and North Carolina – which collectively host a significant portion of U.S. mobile home parks:

Florida

Florida may be a convoluted state when it comes to rules and regulations, since such rules may differ depending on the jurisdiction to which a property is subject. Regardless, Florida heavily regulates utility resale in mobile home parks through both its Public Service Commission rules and state statutes. [Florida Statutes §723.045](#) provides that a park owner who buys utilities (electricity, natural gas, or water) for resale “[shall not charge... any amount for the resale of such \[utility\] greater than](#)” what the utility provider charged the park - [law.justia.com](#). This locks the homeowner's rate to the exact same rate the park paid the public utility.

In fact, charging above that amount is considered unlawful “electricity or water profiteering.” Importantly, for water service, Florida makes a small exception: the park owner may charge the resident for [actual maintenance and administrative costs](#) related to the water distribution system - [law.justia.com](#). In other words, a reasonable service fee for water system upkeep and billing is permissible, but there is no profit margin on the water usage itself.

Florida's Public Service Commission has further rules ensuring fairness. For instance, if master metering is used for electricity in a park, the PSC requires that any submetering or allocation method be solely to [allocate the utility's actual cost among residents](#) - [ncsl.org](#). Any fees collected by the park for electric submeter bills must reimburse no more than the owner's actual cost from the utility - [ncsl.org](#). Park owners also must not charge residents for the cost of the master-meter system's infrastructure or billing beyond what is authorized - [ncsl.org](#).



Florida law essentially views the park as a conduit for the utility: you can divide the utility's charges among your residents, but you can't make money off those charges. Violation of these provisions could not only invalidate the charges but also risk regulatory penalties.

Overall, Florida's approach is strict – full pass-through of costs, with at most cost-based add-ons for water, and full disclosure to residents.

Texas

Texas has one of the more developed sets of submetering regulations, detailed in the Texas Water Code and Texas Administrative Code. **Texas law actively encourages submetering** to promote conservation - codes.findlaw.com, but it lays out clear rules.

In a manufactured home community or apartment scenario, owners may submeter water (and wastewater) for each unit **as long as they charge no more than the utility's price for the water consumed** - codes.findlaw.com.

The statute prohibits any “extra charges” on top of the gallons or cubic feet used and the taxes or surcharges the utility itself imposes - codes.findlaw.com.

To enforce this, owners must maintain records of utility bills and how they allocated costs, and residents have the right to inspect these records - codes.findlaw.com – a transparency measure.

Before any billing begins, Texas operators must register their submetering arrangement with the Public Utility Commission (PUC).

Texas is somewhat unique in that it explicitly allows **a small service charge** to be added for submetered water service. Currently, the law and PUC rules cap this at **9% of the water bill** for the unit - codes.findlaw.com.



For example, if a resident's water usage portion is \$30, the park could add up to \$2.70 as a service fee (9%). This percentage-cap approach scales the fee with usage but keeps it low enough to approximate cost. Texas also permits a late fee for overdue submetered bills, capped at **5% of the bill** - codes.findlaw.com, to incentivize timely payment (late fees cannot be excessive).

Electric submetering in Texas has its own section of rules (in the Texas Administrative Code) - typically, each manufactured home would have its own electric meter with the utility, but in any master-meter situation, similar principles of no mark-up would apply - ncsl.org. Texas requires submetering equipment to meet standards and often requires owners to notify the Texas Public Utility Commission of their submetering arrangements. The key takeaway for Texas is full **cost transparency and modest, regulated fees**. Non-compliance can lead to orders to refund overcharges to residents, and potential involvement by the PUC.

As an operator in Texas, you should follow **PUC guidelines (Title 16, Chapter 24)** carefully when billing for water - ensure your billing formula matches the approved methods, include the required informational disclosures on bills, and never exceed the rate or fee limits set by law - codes.findlaw.com.

California

California's laws on submetering in mobile home parks are designed to protect residents and are backed by both civil code and Public Utilities Commission (CPUC) regulations. For electricity and gas, California has a long-standing rule: the park owner (as a master-meter customer of the utility) **must charge each resident the same rate the utility would charge that resident if they were a direct customer** - ncsl.org



In other words, the park cannot mark up electricity or gas at all – each component of the bill (baseline usage, tiered rates, etc.) has to mirror the public utility’s tariff. The CPUC requires utilities to provide a small discount on the master-meter bill to park owners to account for the cost of maintaining the submeter system, but park residents must still only be billed at retail utility rates - ncsl.org. This prevents any profiteering and ensures mobile home residents aren’t paying more than their neighbors in conventional housing for power or gas.

For water, California updated its Mobile Home Residency Law in 2021 (AB 1061) to impose specific limits on submetered water charges. **If a park bills residents for water via submeters**, the law now allows only three components on the bill - legiscan.com:

1. The resident’s own **water usage**, measured and priced at the water provider’s rate (and excluding any water used for park common areas or other units) - legiscan.com.
2. The resident’s share of any **fixed monthly charges** from the water utility (for example, if the city charges the park \$100 in base fees, and there are 50 homes, each can be charged \$2 as their share) - legiscan.com.
3. A customer charge capped at \$4.75 per month (this cap will adjust with inflation) or 25% of the volumetric water charge, **whichever is less** - legiscan.com.

In practice, that customer charge will usually be at \$4.75 , since 25% of a typical water bill often exceeds \$4.75 only if the bill is quite high. California law prohibits any other charges: no extra “service fees,” no surcharges, and you cannot charge residents for things like system loss or leaks – those are the park’s responsibility (though parks can recover capital improvement costs for utility systems through rent increases or other means, with proper procedures - legiscan.com).



Additionally, California requires detailed billing disclosures: each water bill should show the meter readings and how charges were calculated, and if a third-party billing company is used, that company's name and contact must be on the bill - ncsl.org.

Non-compliance in California can trigger disputes through the state's mobile home Residency Law protection programs or even CPUC involvement (for example, if a park overcharges for electricity, residents can complain to the CPUC).

California's approach is one of the most resident-protective: **charge the exact utility rates, and only modest fees expressly allowed by law**. Park owners should also be mindful of local ordinances (e.g., some cities like San Diego mandate submetering in new multi-unit constructions and impose their own billing rules, such as a \$4 cap on admin fees and specific bill timing) - ncsl.org.

Always ensure you are up to date with both state law and any local regulations in California.

Arizona

Arizona permits submetering and allocation billing (RUBS) for rental properties but imposes different standards depending on the housing type:

- [A.R.S. §33-1314.01](#) applies to park-owned homes and multifamily units.
- [A.R.S. §33-1413.01](#) applies to land-lease manufactured home communities.
- [A.R.S. §33-2107](#) applies to RV parks.

Make sure you're applying the correct statute based on your property type. Charges must reflect actual utility costs, with only allowed admin fees as specified in the applicable section.



However, the law is strict that if you do this, you can only bill the resident for: the **actual cost charged by the utility provider** for that unit's share of usage, **plus** an allowable administrative fee - ncsl.org. The administrative fee is defined as the landlord's actual costs of billing (such as staff time, postage, third-party billing service fees) and **capped at 10% of the utility charges** for that unit or the landlord's actual cost, whichever is less - ncsl.org.

In fact, if a third-party billing company is used, Arizona caps their charges at 10% of the aggregate utility bill as well - ncsl.org - preventing vendors from inflating the cost. The rental agreement must disclose which utilities are separately charged and the amount of any admin fee being applied - ncsl.org, so residents know upfront.

Arizona's law explicitly says **"The landlord shall not impose any other additional charges"** beyond the utility's cost and the permitted admin fee - ncsl.org. This means no late fees (unless separately allowed under general rent payment rules), no "service initiation" fees for submetering, etc., unless provided by law. It keeps billing straight forward. Notably, Arizona allows RUBS (allocating utility cost by formula when individual metering isn't feasible) under the same principle - cost only, plus at most a 10% admin fee - ncsl.org. Park owners using allocation must be careful that their formula fairly reflects usage (to avoid claims of it being arbitrary or an unlawful rent increase in disguise).

Overall, Arizona's framework is considered landlord-friendly in allowing flexible billing methods, but **resident-friendly in capping charges**. To comply, an Arizona MHC operator should: use accurate meters or a fair RUBS formula, charge each resident only their portion of the actual utility bill, and keep any admin fee within the 10% limit (and be able to document that it correlates to actual costs). Non-compliance could lead to residents filing complaints or suing under the Arizona Residential Landlord and Tenant Act. Given the clear statutory language, a resident would have a strong case if, say, a landlord added a 15% markup or failed to disclose fees - so strict adherence is the smart approach.



North Carolina

North Carolina has a highly regulated approach to residential submetering, overseen by the **North Carolina Utilities Commission (NCUC)**. One distinctive rule is that the state **prohibits ratio utility billing system (RUBS)** for water and sewer service—**each lot in a manufactured housing community must have its own submeter**. This ensures accurate, usage-based billing.

To bill residents for water or sewer, **property owners must first apply for a certificate from the NCUC** (required for communities with 15 or more units). Once certified, operators must follow Commission-established rate structures and terms.

North Carolina caps the administrative fee at \$3.75 per month, and **no additional fees—such as late fees or account setup charges—are allowed** in submetered billing arrangements. All other utility-related costs must be absorbed by the landlord or handled through other approved mechanisms.

NCUC also limits the use of estimated billing: if a meter fails, estimated bills may only be used temporarily (typically not beyond 3 months), and the issue must be corrected promptly.

Additionally, **landlords are generally prohibited from passing on fixed costs tied to vacant units to remaining residents**.

North Carolina treats landlords who submeter as regulated entities with specific obligations—**strict adherence to NCUC rules is critical** to remain in compliance and avoid enforcement actions or required refunds.

North Carolina's enforcement is taken seriously. If a landlord were to charge more than the approved rates or fees, they would be in violation of the commission's orders – residents could report this to the NCUC.



The Commission can order refunds of overcharges and even revoke the certificate for serious or repeated violations, which would bar the landlord from billing for water at all. Additionally, the NC Attorney General's office could treat excessive utility charges as an unfair trade practice.

One more unique aspect: **NC requires prompt and accurate billing** – if submeters malfunction, the rules only allow estimated bills for a short period (no more than 3 months of estimates) - tehamawireless.com. After that, the issue must be fixed. This ensures residents aren't left with bills that are in essence educated guesses. Also, if a unit is vacant, the landlord generally cannot charge the remaining residents for that unit's share of fixed costs – the owner has to absorb it. North Carolina's model is somewhat akin to treating the landlord like a mini-utility, with strict tariffs and oversight. For MHC operators, the clear message is to follow the **NCUC's established program** to the letter: get certified, use approved rates, cap fees at \$3.75, and use actual meters for every lot. The effort is rewarded by avoiding fines and ensuring you stay on the right side of state law.





How to Stay Compliant with Submetering Laws & Protect Your MH Community

Discover the key practices and oversight strategies that help manufactured housing operators avoid legal pitfalls, build resident trust, and maintain long-term compliance.



Managing submetered utilities in a manufactured housing community requires careful navigation of legal requirements. The overarching theme in the U.S. is **consumer protection** – states want to ensure that residents are billed fairly and only for what they use.

There is virtually no state that allows unrestricted reselling of utilities; all impose some combination of cost pass-through mandates, fee caps, notice requirements, or oversight. On the flip side, when done in compliance with the law, submetering can be a win-win: residents gain more control over their utility usage (and often lower bills through conservation), and park operators avoid subsidizing heavy users and promote accountability. Always stay updated on your state's laws (they do evolve – e.g., Colorado requires all bills to be both in Spanish and English and to include the community's master meter bill information). If you operate in multiple states, treat each state separately in terms of compliance.

By following the principles of **no markup, full disclosure, accurate metering, and adherence to fee limits**, you can confidently implement submetering and reduce the risk of disputes, fines, or litigation - huduser.gov cascadepbs.org. In summary, know the rules, document everything, and charge utilities as a service to residents – not as a revenue stream – and your community will reap the benefits of a lawful submetering program.

If you'd like expert eyes monitoring your utility billing and guiding your compliance efforts, **ManageAmerica offers monthly utility billing reviews, rate recertification, and access to on-call experts** who can help you stay aligned with submetering regulations.

Schedule a free audit of a portion of your communities to uncover where you may be non-compliant—or where you may be undercharging or overcharging residents.

Please note: ManageAmerica does not provide legal advice and always recommends consulting legal counsel before making regulatory decisions.



Why ManageAmerica is the Best Utility Billing Solution for Manufactured Housing

Manufactured housing communities require a billing solution built for their unique needs—it must:

- ✓ Help ensure compliance at every level
- ✓ Maximize recoupment to protect NOI
- ✓ Seamlessly integrate with property management workflows

ManageAmerica is the only property management software that offers a robust utility billing solution designed specifically for manufactured housing communities, providing:

-  **Industry-leading compliance monitoring & legal safeguards** – ensuring all bills align with jurisdictional regulations and helping mitigate legal risks.
-  **Advanced cost recovery tools & NOI optimization** – including automated rate recertifications and the Utility Variance Analyzer (UVA) to identify and recover lost utility dollars.
-  **Full integration with property management workflows** – eliminating manual reconciliation and reducing administrative burdens.

Our meticulous attention to detail and proactive risk mitigation sets us apart from generic billing providers, ensuring maximum accuracy, compliance, and cost recovery.

If your current utility billing system is creating inefficiencies, compliance concerns, or missed recoupment opportunities, it's time for a smarter approach.



Don't Leave Money on the Table!

Outsource your utilities to the experts! Schedule a demo and our team will conduct a quick audit of a few of your communities – identifying areas where risk could be reduced and dollars recouped.

This sneak peek gives you real-world insights into where you could be recouping more and reducing risk—before you even commit.

Imagine unlocking hidden NOI opportunities across your entire portfolio—let us show you exactly how much you could be recouping.

Let's Get Started



Sources: Relevant state statutes and regulations, including Florida Stat. §723.045 - law.justia.com; Texas Water Code §13.503 - codes.findlaw.com; California Civil Code §798.40-.41 - legiscan.com and CPUC rules - ncsl.org; Arizona Rev. Stat. §§33-1314.01, 33-2107 - ncsl.org; NCUC Rules (NCGS §62-110 and Rule R18) - ncuc.gov; and enforcement case examples such as the Washington AG settlement - cascadepbs.org. These illustrate the uniform goal across jurisdictions: **ensure fair, compliant utility billing in manufactured home communities.**

