November 3, 2026

Boone County Regional Sewer District
Board of Trustees
Columbia, Missouri

RE: Proposed Amendments to User Rate Regulations – Property Owner Billing Responsibilities

Dear Members of the Board of Trustees:

I am writing on behalf of ADAK Properties, LLC, to express my support for the proposed amendments to the District's User Rate Regulations regarding property owner billing responsibilities, while offering several recommendations for their implementation.

As the owner of several rental properties served by the District, I recognize the significant financial exposure associated with delinquent sewer accounts. The possibility of unpaid charges becoming liens against real property presents serious concerns involving marketable title, financing, and other property ownership obligations. I strongly support measures that provide property owners greater control over liabilities that may ultimately encumber their properties.

I also recognize the collection challenges created by the District's transition away from consolidated billing through Boone Electric Cooperative. The former billing arrangement provided an effective incentive for timely payment, and I understand the District's need to establish alternative collection procedures.

I particularly appreciate the proposed grandfathering provisions allowing existing tenant accounts in good standing to continue under their current arrangements. This is a reasonable accommodation that should be preserved.

However, I believe several additional considerations deserve attention before the proposed amendments are adopted.

**Protection of Existing Tenant Accounts**

While grandfathering existing accounts is appreciated, the provision requiring permanent transfer to the property owner after 30 days of delinquency could unintentionally encourage nonpayment. A tenant who understands that delinquency will shift future billing responsibility to the landlord may have little incentive to remain current.

I encourage the District to provide advance notice and an opportunity to cure delinquency before permanently transferring an existing tenant account. Additionally, unpaid charges incurred by tenants should remain attributable to those tenants, without creating new retroactive personal liability for property owners beyond that already imposed by law.

**Reasonable Transition Period**

Rental agreements and rates are often established months in advance. Property owners with existing or recently negotiated leases may be unable to immediately recover newly assumed sewer expenses.

A reasonable transition period would allow landlords to incorporate these costs into future rental agreements without unexpectedly absorbing additional operating expenses.

**Simplified Billing for Multiple Properties**

For landlords managing several properties, maintaining numerous individual utility accounts creates unnecessary administrative work and increases the potential for payment errors.

I encourage the District to offer consolidated billing under one customer account, with a single itemized statement and payment covering multiple properties. Individual property balances should remain separately identifiable. Optional annual prepayment would also be a welcome accommodation.

**Financial and Competitive Considerations**

Properties outside Columbia compete with rental housing within the city. Requiring landlords to incorporate sewer charges into rental rates may make these properties appear more expensive than comparable housing where utility charges remain separately billed to tenants.

While I recognize that these expenses can ultimately be reflected in rental rates, adequate transition time and predictable billing are important to minimizing this competitive disadvantage.

## Summary of Requested Considerations

In support of the proposed amendments, I respectfully ask the Board to consider the following:

1. **Preserve grandfathering protections** for existing tenant accounts in good standing.

2. **Provide advance delinquency notification and an opportunity to cure** before permanently transferring existing tenant accounts.
3. **Clarify responsibility for prior unpaid balances**, preserving tenant accountability and avoiding additional retroactive personal liability for property owners.
4. **Establish a reasonable transition period** for existing and recently negotiated rental agreements.
5. **Offer consolidated billing** under one account with itemized property charges and a single payment option.
6. **Consider optional annual prepayment** and other flexible payment arrangements.
7. **Provide predictable billing and advance notice of rate changes** to assist landlords in establishing competitive rental rates.

I believe these recommendations would strengthen the proposed policy without compromising the District's ability to collect legitimate charges.

The interests of the District and responsible property owners are closely aligned. Both benefit from timely payments, clear accountability, and the avoidance of liens and collection proceedings. My intention is not to discourage these changes, but to encourage their implementation in a manner that is fair, practical, and sustainable.

Thank you for your consideration and for the Board's continued service to our community.

Respectfully,



David Butcher
ADAK Properties, LLC

11/16/2026 TO the Board of Trustees [redacted] 2.

BCRSD
Boone County Regional Sewer District
Clean water for your future

1314 North 7th Street
Columbia, MO 65201
p: 573-443-2774
f: 573-499-0489
www.bcrsd.com

10-27-2026

Any business which receives a bad check can't make the bank responsible - Right BCRSD is a business? Therefore to make the property owner pay if you can't collect on your agreement is totaly WRONG. The rents will be increased!

***Dear Property Owner,***

Boone County Regional Sewer District (BCRSD) recently transitioned its billing operations from Boone Electric Cooperative to a new billing platform, Muni-Link. During this transition, we identified a significantly higher rate of payment delinquency among occupant-billed accounts compared to owner-billed accounts. Currently, approximately 82% of delinquent accounts are attributable to accounts maintained by individuals that are not the property owner.

I strongly oppose thes Regulation

Delinquent sewer charges may become a lien against the property receiving service from BCRSD. As a result, unpaid sewer bills incurred by tenants can create financial and legal consequences for property owners. Because property owners ultimately bear this risk, we believe it is important to communicate these concerns and provide you information regarding the solutions BCRSD proposes to implement in our effort to address delinquent accounts.

unable to attend.

You could be opening a can of Worms

Larry Alderson Sr

**Proposed Changes to Billing Responsibilities**

At its meeting on Monday, November 23, 2026, the BCRSD Board of Trustees will consider proposed amendments to BCRSD's User Rate Regulations regarding billing responsibilities for non-owner-occupied properties. If adopted, the proposed amendments will discontinue BCRSD's current practice of allowing accounts to be held and billed in the name of a tenant, lessee or occupant of the property other than the property owner. A public comment period will be provided before the Board of Trustees considers these changes.

*If the proposed amendments are adopted, they would establish the following:*

- Delinquent Accounts: Occupant-billed accounts that are currently, or subsequently become, more than 30 days delinquent will be transferred into the property owner's name. Once transferred, the account will remain in the property owner's name for all future billing.
- Accounts in Good Standing: Non-owner occupants who consistently pay their sewer bills on time may continue to maintain accounts in their names. BCRSD does not intend to transfer these accounts to property owners unless the accounts become delinquent or a change in tenancy occurs.
- Changes in Tenancy: When a tenant vacates a property, the sewer account will be transferred into the property owner's name. The property owner will then remain the account holder and be responsible for sewer charges associated with subsequent tenants going forward.
- Payment Arrangements Between Owners and Tenants: Property owners may continue to arrange for tenants to pay sewer bills directly. However, the property owner will retain ultimate responsibility for ensuring that all charges are paid in a timely manner.

**Our Commitment to Fair and Sustainable Rates**

We recognize that many tenants are responsible customers who consistently pay their bills on time. These proposed changes are not intended to penalize those customers, but rather to improve payment accountability, reduce outstanding balances, and protect the financial stability of BCRSD.

[redacted]

Report This Email

[redacted]

[redacted]

[redacted]

Jess Brodhacker

[redacted]

Wants to talk about the Letter that went out land owners.
Issues he brought up.
Passing on cost to them making it easier for us.

If he can attend the Board Meeting

Thinks if we do this there should be a price DECREASE

Wants to know if we talked to the City of Columbia about why they are not doing this ?

How many other sewer districts did we investigate to find out that many of them dont bill tenants and only bill land owners.

Who is the regulatory body over us.

He has approximately 40 active accounts with tenants.



11/13; SPOKE WITH CUSTOMER VIA CALL

KEY TAKEAWAYS;

1. Has multiple properties with over 250 tenants
2. Has not received timely notices of delinquent accounts.
    a. Noted the increase of communication after separation for account issues
3. "Only going to benefit 'District'"
4. If it's a good idea, why hasn't it been executed by COC.
5. Would this lead to a decrease in rates?
6. Owners already have a lot of responsibilities, ledger accounting would add more.
7. Are penalizing and "painting the whole" for a small group who is causing the issue.



Drew-

I wanted to email a few thoughts about these proposed changes, essentially everything you and I had a chance to go over via the phone call we had together.

My biggest concern with these changes are as below:
- the incurred cost and time that it is going to put on the property owners/managers, which in return will get passed on to the tenant, via increasing rent. I know a lot of property owners, as well as tenants, are doing everything we can to keep rents low and affordable; as everything is increasing in price and rent increasing is just one more thing to worry about.
- penalizing the ones who are doing it correctly and would do it correctly, but making these changes because of the ones that do not do it correctly.
- communication is an absolute must with something like this, and up until now, the property owner's have not had hardly any, if any, communication when a tenant has a delinquent bill. Being a property owner, I want to know when a tenant is delinquent, and will take every step possible to try and get that tenant current with their utility. This not only keeps the tenant in good standing, but more so keeps my property/property owner in good standing with the utility company. Property owners have absolutely no communication regarding this matter, so we have not been given any chance to help correct this problem. A great example of this was just the other week when one of my tenants was delinquent. I was notified about the matter, and within an hour, I was able to make contact with my tenant and get them to contact you guys and get paid current. Obviously this won't be the case in every matter, but it shows that given the opportunity to do so, owners can and I think would take action.
- if these changes do take place, will we be taking a rate decrease? Since I"m assuming that some of the rate increases in the past have been for administrative cost. With this cost being put on the owners, it would be significantly less cost/headache for the sewer district and more for the owners, so that cost should transfer to the owners so we can make the appropriate changes on our end to accommodate the newly incurred cost.

I do not agree with these changes taking place, and think that as adults, tenants have many rights, and we as owners should not have to bear the responsibility of their utilities. This is only going to increase cost for owners, which will translate to higher rent cost, which is going against what we as a city are trying to do, which is create and sustain affordable housing. In a world with so much turmoil already as we have today, it's imperative to help keep costs down, particularly related to such a big portion of someone's budget, such as housing. Owners need to be given the opportunity to correct this problem, and those that fail to do so, action be taken

against them directly, not across every owner with one paint brush.

With attending this meeting virtually, will comments be able to still be made during the public comment period at the beginning?

Thank you

Jess
COMO Management

[redacted]

> Early Noon Jess,
>
> Reaching out to follow up from a call my team received regarding some questions and concerns you have about the proposed billing transition from tenants to owners.
>
> I am collecting responses from all interested parties in preparation of the upcoming board meeting that will commence on Monday 11/23 at the Boone County Commission Chambers at 5:30 pm.
> There will be an opportunity for public comment early in the meeting and invite you to join, if interested. You are also welcome to send along a reply via this email thead, and/or document, that will be presented to the board.
>
> Please keep an eye on our website, www.bcrsd.com, for the board meeting details. Virtual attendance will be available too.
>
> Thanks for your time and here for further assistance,
>
> [redacted]

November 13, 2026

Board of Trustees
Boone County Regional Sewer District
1314 North 7th Street
Columbia, MO 65201

**Re: Opposition to Proposed Transfer of Delinquent Tenant Accounts to Property Owners**

Dear Members of the Board,

As a property owner and on behalf of BARUCH Property Management and Remodeling, LLC, I am writing to oppose the proposed policy described in your October 27, 2026 notice that would transfer delinquent tenant sewer accounts to property owners.

When a tenant opens a utility account in their own name, they are expected and required to pay their utility bills, including sewer charges; therefore, the tenant should remain responsible for any unpaid balance. The tenant's failure to pay should never be grounds for transferring the account or the outstanding balance to the property owner or management company.

We recognize the District's need to collect outstanding balances and maintain reliable services. However, transferring delinquent accounts to property owners does not resolve the underlying failure to pay. It shifts the collection burden to another party, requiring owners and managers to pay charges assigned to tenants and then pursue reimbursement themselves.

Property owners and management companies cannot guarantee that tenants will fulfill every financial obligation. We can communicate responsibilities, enforce lease provisions, and cooperate with the District, but we should not be required to serve as guarantors or collection agents for tenant-held utility accounts.

The permanent nature of the proposed transfer is particularly concerning. Under the proposal, once a delinquent account is transferred, it would remain in the owner's name for all future billing. This would make an individual tenant's nonpayment the basis for imposing an ongoing obligation on the owner, even after that tenant leaves and a new tenant assumes responsibility for utilities under a new lease.

Your notice acknowledges that property owners may already face consequences when unpaid sewer charges attach to a property. That concern deserves attention, but it does not justify automatically transferring delinquent tenant accounts to owners. Instead, the District should prioritize timely notification and collection efforts directed toward the account holder responsible for payment.

We respectfully ask the Board to reject the proposed mandatory transfers and preserve tenant responsibility for tenant-held accounts. A more appropriate approach would include:

- Prompt delinquency notices to tenants, with copies to property owners or authorized managers.
- A reasonable opportunity for tenants to resolve overdue balances.
- Payment arrangements and collection procedures directed toward the responsible account holder.
- Voluntary owner billing when an owner expressly chooses that arrangement.

Our objection is straightforward: **when utility payments are the tenant's responsibility, the tenant's failure to pay should not automatically transfer that responsibility to the property owner or management company.**

Please include this letter in the public comment record and provide it to the Board before its November 23, 2026, meeting. I urge the Board to reject this provision and develop an approach that preserves accountability for those responsible for the bills.

[redacted]

Sincerely,

**Juan E. Castro**
BARUCH Property Management & Remodeling, LLC
[redacted]

**Subject: Comments and Recommendations Regarding Proposed Changes to BCRSD User Rate Regulations**

**To: Boone County Regional Sewer District Board of Trustees**

November 3, 2026

Dear Members of the Board,

I am writing in response to the October 27, 2026 notice regarding the proposed changes to BCRSD's User Rate Regulations and the handling of sewer accounts for non-owner-occupied properties.

I understand the District's concern regarding delinquent accounts and recognize the importance of maintaining a reliable revenue stream to support sewer operations. However, I have concerns about the proposed changes and believe there are opportunities to address delinquency while maintaining a fair balance between the responsibilities of tenants, property owners, and the District.

I currently manage 20 rental units in the Columbia area, each with separately billed sewer service. Under the proposed changes, property owners could become responsible not only for unpaid sewer charges but also for additional fees and penalties resulting from a tenant's failure to pay.

My primary concern is that property owners have very limited ability to control or mitigate these delinquent accounts while a tenant occupies the property. We cannot independently enforce payment to the District, and we have no authority to disconnect sewer service. Yet, under the proposed regulation, the financial consequences of a tenant's failure to pay ultimately fall on the property owner.

I believe the following considerations deserve further discussion before the proposed regulation is adopted.

### 1. Establish a Refundable Deposit for New Sewer Accounts

I believe the District should consider requiring a refundable security deposit when a new tenant establishes sewer service. A deposit based on a reasonable number of months of average usage would provide the District with some financial protection against delinquent accounts without automatically transferring the entire collection risk to property owners.

This would also establish a more consistent approach to protecting the District's financial interests while maintaining individual tenant accountability.

### 2. Distinguish Actual Sewer Charges From Late Fees and Penalties

If the District elects not to require deposits, I believe it is reasonable to distinguish between actual sewer usage charges and penalties resulting from a tenant's failure to pay.

Property owners should be responsible for the actual sewer service charges associated with their properties. However, I strongly believe that late fees, administrative penalties, and discretionary collection charges should not automatically become the property owner's responsibility when those charges resulted

from a tenant's failure to pay and the owner was not provided timely notice or a reasonable opportunity to intervene.

At a minimum, the District should establish a policy that limits the owner's responsibility for these additional charges once the account transfers into the owner's name. I recognize that certain charges may be governed by state law, but I believe the District should explore every reasonable opportunity to protect property owners from penalties they had no ability to prevent.

### 3. Require Timely Notification of Delinquent Accounts

If property owners are ultimately responsible for delinquent accounts, they should receive timely notification when an account becomes delinquent.

I would recommend that the District provide written or electronic notification to the property owner when a tenant's account becomes delinquent, rather than waiting until the account reaches the 30-day transfer threshold.

This would give property owners an opportunity to contact the tenant, address the outstanding balance, and prevent additional charges from accumulating. It is difficult to justify holding an owner financially responsible for penalties when the owner has not been given a reasonable opportunity to address the situation.

### 4. Allow Future Tenants to Establish Their Own Accounts

The proposed regulation indicates that once an account is transferred into the property owner's name, it will remain in the owner's name for all future billing.

I would ask the Board to reconsider making this a permanent arrangement.

If a tenant vacates a property or an account is transferred due to a previous tenant's delinquency, why should a subsequent tenant who has no history of delinquency be prevented from establishing an account in their own name?

I believe the District should continue allowing tenants to maintain individual accounts, provided they meet reasonable account requirements, including any applicable deposit requirements.

One tenant's payment history should not permanently determine the billing arrangement for every subsequent tenant occupying the property.

### 5. Clarify Billing Transfers and Final Account Responsibilities

I would also appreciate clarification regarding how outstanding balances are handled when a tenant vacates a property. Specifically:

- Are final sewer charges prorated through the tenant's actual move-out date?
- Does the District provide a final statement before transferring the account to the property owner?
- What opportunity does an owner have to dispute charges incurred before the account transfer?
- Are late fees and other charges suspended while a legitimate billing dispute is being reviewed?

These procedures are important to ensure that property owners are not held responsible for inaccurate billing or charges that cannot be reasonably verified.

**Closing**

I want to emphasize that I am not opposed to property owners being responsible for legitimate sewer charges associated with their properties. I understand that the District must protect its financial interests and that unpaid balances ultimately affect all customers.

However, I believe the proposed changes place a disproportionate burden on property owners without providing adequate safeguards or addressing the underlying collection problem.

Other utility providers, including Boone Electric Cooperative and Ameren Missouri, have established procedures involving customer deposits, delinquency notifications, and disconnection policies. I believe BCRSD should explore similar collection safeguards before placing the ongoing financial responsibility for tenant accounts on property owners.

I respectfully submit these comments for the Board's consideration ahead of its November 23, 2026 meeting. I would appreciate confirmation that this letter will be distributed to all members of the Board of Trustees and included in the materials considered before any vote is taken on the proposed regulation. I also welcome clarification or feedback from the District regarding the concerns and recommendations outlined above.

Thank you for your time and consideration.

Sincerely,



**Tyler Rambis**
Property Manager
Greg Nichols Properties, Inc.

[redacted]

Report This Email

[redacted]

**From:** Brian Allen [redacted]

Good morning. Short version is a vehement "No".

I question whether what you are proposing is even legal (though, I fear it might be) and whether the BoCo Commission, PSC, or DNR (??) would need to approve/support such a change. I'm not fully informed on the details behind what you're proposing (to turn individual property owners into "collection agencies" or "bag men" to collect for you), but I don't buy that you just discovered this "significantly higher rate of payment delinquency" while transferring to a new billing platform. If that truly is the case, then BCRSD staff are doing a poor job of keeping on top of accounts and you should look at improving internal controls to better monitor. Maybe an independent audit (State Auditor??) might help to show you improvements to your operations/billing.

I also suspect your statistic of "82% of delinquent accounts is from occupant-billed accounts", while maybe true, is somewhat of a paper tiger convenient to support your position/proposal. What is the overall delinquency rate?

It is NOT reasonable to place the burden of collecting your "too high" sewer rates to an owner of a rental property. Common sense dictates one to recognize the sewer is directly related to water usage. If someone is delinquent on sewer, cut the water off - don't transfer your inability to collect to rental property owners who are already paying for the luxury of having investment properties through taxes, insurance, and mortgages (that's lazy - are you going to pay me to collect what you apparently cannot?? I think that answer is "no").

Make an agreement with whoever is providing water, which, for my location, is Cons PWSD#1 to collect your charges and cut water service off if someone is delinquent on their sewer bill - seems like that would get attention really quick and resolve the issue of delinquent accounts. The only reason I can think that you don't do the obvious is because of real or perceived obstacles - turf battles/personality conflicts between the utilities involved (unwillingness to work together). Is it "too hard"? Grown ups rarely get to claim that - why

should you?

Longer term - I would propose you transfer sewer assets (and water/electricity as well-I understand those utilities are not your problem) within the City of Columbia to the city. I understand growth happened more quickly than utilities could manage. My property on Southampton Drive has been waaaaay inside city limits for decades and is still mired in a difficult location where cobbled-together, multiple separate utilities are providing service and billing is a mess (Boone Electric for electricity/sewer-though, sewer not for long, City of Columbia for trash, Cons PWSD#1 for water, and, now, BCRSD for sewer via another third party). It's almost embarrassing to explain to tenants how it's all cobbled together.

While I'm typing, you are too expensive - why? I had to pay a significant sewer charge earlier this year during a brief vacancy that, in my mind as a customer, is over the top. The bill was for $37 sewer only while the unit was empty! There's no logic that would pass the "sniff" test of such a high bill, except that you're seizing the opportunity to "cash in" when you can (I thought I was to get some of that back, but don't recollect that happening).

I suspect I don't have all the details you do, but it sure seems there are more common sense ways to resolve your inability to collect onto rental property owners.

Regards,
Brian Allen

[redacted]

Dear Elke,

Thank you for sharing this information. I support the proposed approach of placing sewer bills for new tenants and those with delinquent accounts in the landlord's name. If delinquent accounts are largely associated with tenant accounts, this seems like a reasonable way to improve payment consistency and help ensure the district has the funds needed to operate the system—without shifting the cost of unpaid bills to customers who pay on time.

I recommend that the district clearly notify both landlords and tenants about the billing arrangement and explain how charges and payment responsibilities will be handled. With that communication in place, I believe the proposal is a good idea and support staff's recommendation to the Board.

Thank you for asking for input.

Sincerely,

Melanie Cheney

[redacted]

On Nov 13, 2026, at 11:21 AM, Elke Boyd [redacted] wrote:

Melanie,

Since billing for sewer services has been separated from Boone Electric, there has been a sharp increase in Boone County Regional Sewer District Customers who don't pay their bills. This non-payment reduces the available funds to provide sewer services to our customers.

The vast majority of the delinquent accounts belong to tenants rather than homeowners. Past experience has shown, that putting sewer bills in the name of the landlord rather than the tenant is the most effective way to help accounts stay current and to cover our cost of operating the system. This method would allow us to fund operations without asking our paying customers to cover the shortfalls created by non-paying customers.

At our upcoming Board of Trustees meeting, staff will recommend to the board that sewer bills for new tenants and those tenants with delinquent accounts will be put in the name of the landlords.

I would appreciate an email stating your opinion on whether it is a good idea to go forward with allocating billing as described above.

Thank you for your input,



Dear Mr. Perkins,

I'm writing as a Boone County Regional Sewer District customer to support billing sewer service for rental properties to the property owner rather than the tenant.

I understand that since sewer billing was separated from water, the district has seen a significant increase in unpaid accounts, largely at rental properties. Unlike water, sewer service can't practically be shut off for nonpayment, so the district has little leverage once a tenant stops paying or moves on. We know those uncollected balances don't disappear and I am concerned that those balances will end up spread across every customer through higher rates, punishing those who actually pay their bills.

Billing the owner places responsibility with the party who has a lasting stake in the property and the means to manage it, whether through the lease, a deposit, or rent. That seems like a fairer arrangement than asking customers who pay on time to cover the shortfall.

I'd encourage the district to adopt owner-responsible billing.

Thank you for your consideration,
Brian Corrigan