



MEMORANDUM

EUGENE WATER & ELECTRIC BOARD

Rely on us.

TO: Commissioners John Brown, Steve Mital, Dick Helgeson, James Manning and John Simpson

FROM: Mark Freeman, Energy Management & Customer Services Manager and Kathy Grey, Residential Energy Management Services Program Supervisor.

DATE: January 27, 2014

SUBJECT: Non-Owner Occupied Weatherization and Energy Efficiency Programs

OBJECTIVE: Information Only

Issue

In advance of the February 4, Board discussion regarding non-owner occupied weatherization and energy efficiency programs, staff was asked to gather information for the Commissioners. Information asked for included examples of codes and incentives from other utilities, states and Public Utility Commissions (PUC). Due to limited time and resources staff was not able to fully review and provide a comprehensive set of examples prior to the February 4th Board Meeting.

Background

EWEB has weatherized a significant number of non-owner occupied residences in its service territory and is now faced with the hard-to-reach property owners. Over the last 5 years EWEB has weatherized 4,861 electric heated non-owner occupied units and it is estimated that between 6,000 - 6,800 non-owner occupied units are left to address. See January 7, 2014 Board memo link for more details;

[http://www.eweb.org/public/commissioners/meetings/2014/140107/M9.pdf..](http://www.eweb.org/public/commissioners/meetings/2014/140107/M9.pdf)

EWEB Commissioners have concerns that segments of EWEB customers may not be adequately served by voluntary participation in EWEB and State energy efficiency programs. These programs rely on the property owner to make an investment. Incentives in the form of utility rebates; loans (zero-interest utility, city rental rehabilitation, and state loans); and federal and state tax credits are obtainable. Even with financial support some property owners have not taken action to invest in energy efficiency improvements, prompting EWEB to assess alternatives for addressing non-owner occupied properties.

Eugene City Councilors enacted a mandatory weatherization ordinance for existing homes in February 1981. This ordinance was reviewed in 1984 and again in 1991¹. EWEB had already adopted its Residential Conservation Service (RCS) program in May 1980, under

¹ Referenced City of Eugene Ordinances 18757 http://ceapps.eugene-or.gov/portal/server.pt/gateway/PTARGS_0_0_5848_319_0_43/http%3B/cesrvlf02/CMOWebLink/DocView.aspx?id=395756&page=1&dbid=0 19213 and 19591

the National Energy Conservation Policy Act of 1978 (NECPA). Oregon State legislation (ORS 469.651) required utilities to provide a financing program for cost-effective energy conservation measures that included a choice between a cash payment (incentive/rebate) or a loan (effective date November 1981). Enactment of the Northwest Power Act (1980) created a statutory obligation for Bonneville to acquire energy conservation. In 1982, the Bonneville weatherization program replaced EWEB's RCS program.

As part of EWEB's standard home energy assessments from 1981-1991 EWEB staff collected and recorded data related to compliance with the City weatherization ordinance (attachment 1). Because of the convergence of energy conservation legislation and high community participation in EWEB's residential conservation program the City Council repealed portions of the original ordinance and amended the Eugene City Code (1991). Today the City Weatherization Code still exists as part of Chapter 8: Structures, Section 8.265 of the Eugene Code: <http://www.eugene-or.gov/DocumentCenter/Home/Index/262>

Discussion

Presuming that EWEB's current energy efficiency programs inducements are not sufficient to entice the remaining rental property owners to take voluntary actions, what, if any, alternative actions or inducements should EWEB consider? Who would be responsible for defining these standards? What is EWEB's responsibility for carrying out these actions, and what impacts might these actions have on utility costs, rates and reputation?

Responding to early federal and state energy conservation legislation, EWEB's Energy Management department was chartered to acquire energy savings. Annual energy savings targets are guided by the Integrated Electric Resource Plan (IERP) and budgeted for accordingly. Resource acquisition targets and budgets have been reduced in recent years in response to stagnate load growth. Fiscal year 2014 budget is based on projected resource allocations, should programs be expanded or implemented current budget assumptions may not be adequate.

Alternative actions span from voluntary to regulatory participation. There are State enacted energy efficiency legislation and published energy efficiency program scoping documents and reports². Energy efficiency requirements are not always clearly defined within the legislation and are left to administrators and regulators to write the rules.

Many cities have rental housing codes similar to the City of Eugene that set minimum structural, and occupancy health and safety standards. City rental ordinances and housing codes may include energy efficiency standards; some by referencing other codes such as the International Code Council (ICC) energy conservation codes for buildings; or building energy performance ratings. Mandatory building assessments may be required when a property is sold or periodic assessments completed based on a specific building age or set number of years. There may be fees for compliance assessments, and fines for non-compliance. Utility engagement varies. Of the information referenced, approximately 45% have gone to a code compliance and/or disclosure model. See attachment 2, Energy

² <http://www.oregonlaws.org/ors/469.651> <http://www.energy.ca.gov/2012publications/CEC-400-2012-015/CEC-400-2012-015.pdf>; <http://docs.legis.wisconsin.gov/statutes/statutes/101/1/122> Section 101.122 Rental unit energy efficiency; Washington State Initiative 937, Section 4.

Efficiency Program Comparison Case Studies, [Austin Energy Rental Release Form](#), attachment 2.1, Utility Incentive Comparison Table, and attachment 3, Energy Efficiency Programs in Rental Properties chart.

Based upon feedback from rental property owners and managers focus groups conducted November 2012, EMS has moved forward with a targeted communication effort to reach rental property owners to get them to contact EWEB and make energy efficiency upgrades to their rental properties. The first postcard, in a series of three, was sent out January 13, to the 2,900 targeted property owners. The second is scheduled for January 27, and the third on February 10, 2014. Attachment 4 includes copies of postcards for each of these mailings. To help measure the success of this campaign a dedicated phone line has been set up and the URL on the postcard takes the property owner to the rental landing page <http://eweb.org/saveenergy/rental>. To assist renters in their housing search, EWEB is also looking to highlight rental properties that have undergone efficiency upgrades on our website. This will allow potential renters to learn what has been done and if the property is not on the list, the fact nothing has been done. This was scheduled for 2013 however, due to resource constraints we will attempt to complete in 2014.

A statistical summary of tenant complaints by nature of the complaint (energy/heating) was requested and received from the City of Eugene. For the period spanning July 1, 2012 through December 01, 2013 there were total of 28 written complaints. Fourteen of these included weatherization or heating complaints; four cited weatherization alone as the issue while the balance cited weatherization or heating in combination with other complaints. To put that into perspective, 14 complaints received in 18 months out of possible 35,000 plus complainants is a small percent. (attachment 5).

Staff is also checking with the State regarding related rental legislation. This information was not received in time to include with this memo and if received before February 4, it will be made available to the Board as an addendum.

Recommendation/Requested Board Action
Informational only

Q. City of Eugene Mandatory Weatherization Considerations

If any question is not applicable to this house, enter N.

Was the house built before July 1, 1974?
If NO, do not complete this section.

Is there an attic with a clear height of 30" or more?
If YES, are there any obstructions preventing installation of R-30?

If YES, is the attic insulated to the highest possible R-value?

Would additional attic insulation create a wiring fire hazard?

Is there a crawlspace under the floor with a clear height of 18 inches or more?

If there are uninsulated heater ducts in an unconditioned space, is there a clear height of 18 inches or more?

(Y)	N
(Y)	N
Y	(N)
Y	N
(Y)	N
Y	(N)

S. BPA Indoor Air Quality Considerations

Does this house contain permanently installed electric heat that was installed prior to December 1, 1981?

If YES,

(Y)	N
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Does insufficient crawlspace ventilation or lack of a ground cover disqualify house?

Does house contain airtight wood stove or fireplace insert?

Does house contain any unvented combustion appliances?

Does house get its potable water from a well?

Does house contain exposed masonry walls or floors whose total area is equal to or greater than 10% of the floor area? Or is house built on a slab? Or is house built over a basement?

Does house contain any urea-formaldehyde foam insulation?

Is the house a mobile home?

(X)	N
(Y)	(N)
Y	(N)

Ed. rev'd
9-30-83
R.O.



EWEB ENERGY ANALYSIS FORM

Reviewed

Data Entry

NOV

9 1990
(11-8-90)

Circle One

SHPO

Delete

Calc-Print

Re-Enter

Account Number:

16-706 28050

Copy from acct #:

Analysis Date:

11-6-90

Customer Name:

[REDACTED]

Owner Name:

Customer Address:

(OS)

[REDACTED]

Customer Phone:

[REDACTED]

Mail To:

[REDACTED]

Analyst Name & #:

Paul J. 10296

Address:

[REDACTED]

Conditioned Area:

1242 -

Phone:

[REDACTED]

Conditioned Vol.:

8808 -

HEAT PRODUCING ITEMS:

Electric Heat:

(Y) N -

- # 1 Fans
5 Recessed Lights
Door Bell Transformer
Other

Electric Heat Type:

- 01 Forced Air (clockstat) Y/N
02 Baseboard / Wall Heaters
03 Ceiling Cable
04 Heat Pump (clockstat) Y / N
05 Hydronic
99 Other _____

Dwelling Type:

- (01) Single Family / Quad
02 Duplex
03 Triplex
04 Fourplex
05 Condo
06 Mobile Home
99 Other # units _____

ANALYSIS CHECKLIST

Age of Dwelling:

30

(Y) N Weatherstrip Windows / Doors

Y / (N) Caulk Windows / Doors

Y / (N) Safety Glass Noted

(Y) N Egress Noted

Y / (N) Knob & Tube

(Y) N Verify or Pre-Inspection
Attic / Walls / Floor

Y / (N) C.B.R.S. Offered

ANALYSIS SUBMITTED 2 NOV 9'90

Uninsulated:

- Unconditioned _____ / Insulated _____
Conditioned _____ / Insulated _____

Solar Potential:

(Y) N

WEATHERIZATION ORDINANCE:

General:

(Y) N Was the dwelling built before July 1, 1974?

Attic:

(Y) N Is there 30 inches or more of clearance?

(Y) N Can R-30 be installed?

Y / (N) Does highest R-value possible exist?

Y / (N) Would additional insulation create a fire hazard?

Floor:

(Y) N Does crawlspace have 18 inches of clearance?

(Y) N If there are uninsulated ducts / 18" clearance?

City of Austin – Austin Texas

Utility:	Austin Energy
Type:	Municipal community owned utility Austin Energy offers residential and commercial retrofit and new construction energy efficiency programs. First programs began in 1982. Austin Energy provides rebates and partners with a local credit union to provide loans. Federal and State grant awards have allowed Austin Energy to develop or expand its energy efficiency programs. In 2012 Austin Energy was awarded a Better Buildings grant of \$5 million that was used to secure loans.
Ordinance:	Yes Energy Conservation Audit and Discloser Ordinance (ECAD) enacted 2008, and amended 2011.
City Code:	TITLE 6, ENVIRONMENTAL CONTROL AND CONSERVATION, Chapter 6-7, Energy Conservation. Encompasses residential, multifamily, condominiums and commercial facilities and contains a provision for owners of high energy use facilities to disclosure to tenants. Director is defined as Director of the Austin Electric Utility.
Utility Engagement:	Yes
Single Family Housing Requirements :	Structures containing 1-4 units. Audit must be performed prior to sale and disclosure to potential buyers at least three days before end of option period. <ul style="list-style-type: none"> • Rebates; low interest loans available through Austin Energy partnership with credit union <i>Exemptions from audit:</i> <ul style="list-style-type: none"> • Existing audit that meets the energy audit requirements • Home less than 10 years old • Received \$500 rebated or made 3 energy efficiency improvements within last 10 years
Multi-Family Housing Requirements :	Structures containing 5+ units. Audit must be performed when 10 years old and report results to the City. <ul style="list-style-type: none"> • If energy use index 150% or higher than other multifamily must supply prospective tenants with a high energy use notice • Required to reduce energy by 20% • Rebates up to \$200,000 combined per customer site per fiscal year through Austin Energy <i>Exemptions from audit:</i> <ul style="list-style-type: none"> • Existing audit that meets the energy audit requirements • Received energy rebate in last 10 years for duct remediation or air conditioner replacement
Non-compliance:	Class C misdemeanor fine of \$500-\$2,000
Limited Income:	Free Home Weatherization Services through Austin Energy. <ul style="list-style-type: none"> • Qualified applicants 200% FPL • Single family only –(1-4 units) • Home must be appraised at <\$200,000 including land • Rentals – Landlord must agree to the work and sign an Austin Energy rental release form <ul style="list-style-type: none"> ○ http://my.austinenergy.com/wps/wcm/connect/08534431-0897-457d-b9a5-a1ce189a320f/freeHomeEnergyImprovementsRentalReleaseForm-RES.pdf?MOD=AJPERES&CONVERT_TO=url&CACHEID=08534431-0897-457d-b9a5-a1ce189a320f

Energy Trust of Oregon

Utility:	Portland General Electric, Pacific Corp, Northwest Natural Gas
Type:	Investor Owned Utilities
Ordinance:	No
City Code:	N/A
Utility Engagement:	<p>Yes.</p> <p>Energy efficiency program rebates. Energy Trust provides a no-cost walk through survey with estimates of energy savings. Report also identifies which upgrades qualify for cash incentives and BETC energy tax credits.</p>
Single Family Housing Requirements :	<p>Structures containing 1-4 units.</p> <p>Rebate eligibility:</p> <ul style="list-style-type: none"> • Projects with estimated incentives of \$750 or more, submit an application for pre-approval. • Additional requirements for specific technologies (i.e.: LED lighting fixtures) • Meet standard program minimum efficiency guidelines to be eligible for residential upgrades
Multi-Family Housing Requirements :	<p>Structures containing 5+ units.</p> <p>Rebate eligibility:</p> <ul style="list-style-type: none"> • Projects with estimated incentives of \$750 or more, submit an application for pre-approval. • Additional requirements for specific technologies (i.e.: LED lighting fixtures) • Meet standard program minimum efficiency guidelines to be eligible for commercial upgrades • Also includes condominiums campus living and assisted living facilities.
Non-compliance:	N/A
Limited Income:	<p>"Savings Within Reach" program designed to assist moderate-income, single family households.</p> <ul style="list-style-type: none"> • Increased incentive levels for those whose incomes qualify. • Incentive amount is deducted from the customer invoice prior to invoicing. • Landlord must apply for rental properties. <p>http://energytrust.org/income-qualified-assistance/savingswithinreach/</p>

City of Boulder - Boulder, Colorado

Utility:	Xcel Energy/Public Service of Colorado
Type:	<p>Investor Owned Utility.</p> <p>Relies on utility rebates and loans through credit unions and the Bank of Colorado.</p>
Ordinance:	<p>Yes</p> <p>Smart Regulation (SmartRegs) ordinance 7726 adopted by Boulder City Council 2010</p>
City Code:	<p>Yes</p> <p>Boulder City Code: City of Boulder Housing Code, Rental Licensing Code</p> <p>Requires all rentals to be licensed before occupancy. Sets baseline energy efficiency requirements for existing rental housing. All rental units must comply by completing an energy audit and submitting it to the City before January 2019.</p> <p>Chapter 10-3 Rental Licenses: Securing a rental license is responsibility of property owner and discovery of unlicensed rental property results in legal action. License is good for 4 years. Penalties for violation include fines and possible revocation of rental license.</p> <p>Chapter 10-7 Energy Conservation and Insulation Code Ordinance 7925 amends this Chapter to establish 2012 International Building code as minimum code standards.</p>
Utility Engagement:	Yes
Single Family Housing Requirements :	<p>Structures containing 1-4 units.</p> <ul style="list-style-type: none"> • Charge for Energy Audits, rebates from 60% of the cost of audit to \$200 based on type of audit (Xcel Energy) • Energy Efficiency Requirement (Future January 2, 2019) • Prescriptive energy efficiency measures (checklist) 100 points or performance HERS index of 120 <p><i>Exemptions from audit:</i></p> <ul style="list-style-type: none"> • Units weatherized through a state or federal subsidy program after September 1994, documentation required • Buildings that energy conservation an insulation codes (typically permitted after July 2001). • Manufactured homes • Accessory dwellings units • Dorms • Historic Buildings Under Historic Preservation
Multi-Family Housing Requirements :	Structures containing 5+ units.
Non-compliance:	Penalties for violation include fines and revocation of rental license
Limited Income:	<p>Free home weatherization services through Colorado Energy Office and Longs Peak Energy Conservation.</p> <ul style="list-style-type: none"> • Qualify through public assistance programs or income guidelines • Landlords must submit a weatherization permission form.

City of Berkeley – Berkeley, California

Utility:	PG&E
Type:	Investor Owned
Ordinance:	<p>Yes</p> <p>Residential Energy Conservation Ordinance (RECO) 5802-NS §2 1987.</p>
City Code:	<p>Berkeley City ordinance:</p> <p>Residential Energy Conservation Ordinance (RECO) pursuant to California building Code 2010 Title.</p> <p>RECO has enacted to improve energy and water efficiencies; promote upgrades and utility costs savings in Berkeley's housing stock for over 30 years. Applies to all homes: single-family and multifamily. Any home or multifamily building sold or ownership transferred; or undergoing renovations of \$50K or more in Berkeley must meet the energy and water efficiency standards. The City maintains audit records for each residential property. A RECO certificate proves that minimum energy codes have been met and may be transferred at time of sale of property. Defines maximum expenditures required.</p>
Utility Engagement:	Yes
Single Family Housing Requirements :	<p>All residential buildings:</p> <ul style="list-style-type: none"> • Audit at change of ownership, exchange or renovation • Audit fee \$100 single family plus \$50 for every additional unit (Community Energy Services Corp) • Certificate of compliance filed with sell, exchange or renovation • All feasible measures must be installed to receive certificate of compliance • City inspection fees • Does not include window, furnace and most water heater upgrades <p><i>Exemptions from audit:</i></p> <ul style="list-style-type: none"> • RECO audit performed since January 1, 1992 • Existing RECO certificate of full compliance
Multi-Family Housing Requirements :	N/A
Non-compliance:	Fines for each unit not brought into compliance
Limited Income:	<p>Free Home Weatherization Services through CESC and PGE.</p> <ul style="list-style-type: none"> • Income Qualified • Rentals – Landlord must agree to the work.

ENERGY EFFICIENCY INCENTIVE COMPARISON - 2014

UTILITY PROGRAM	EWEB		SUB		Tacoma		Snohomish		Seattle	
	Rebates	Loans	Rebates	Loans	Rebates	Loans	Rebates	Loans	Rebates	Loans
Heating Systems: Ducted and Ductless Heat Pumps	\$500-750	\$5,000-9,000 0% interest	\$500-\$1,000	\$7,000 0% interest loan	\$800	0% interest loan, no cap	\$600-\$2,500		\$1,200	
Duct Sealing	-	-	\$500	\$850 - 0% interest loan	\$450	N/A	\$800		-	
Air Sealing	-	-	N/A	N/A	N/A	N/A	-	\$50,000 Interest rate up to 8.74%	-	
Insulation	\$0.40 up to 50% of job cost	Up to \$4,000 - 0% interest	50% rebate on lowest bid cost	0% interest loan, no cap	\$.50 p/sq ft	0% loan, no cap	\$.50-.70 p/sq ft		\$.50-\$.65 p/sq ft	Up to \$30,000 Outsourced
Windows	\$1/sq ft-\$5/sqft		N/A	\$4,000 0% interest loan	\$2 - \$4 p/sq ft of glass	\$20 p/sq ft of windows 0% interest minus rebate	\$6-8 p/sq ft		-	
Home Performance	N/A		-	-	-	-	-		-	
Water Heater	-		-	-	-	-	-		-	
Heat Pump Water Heater	\$200-\$300		-	-	-	-	-		\$500	
Washers	-		\$30-\$80	-	-	-	-		\$100	
Refrigerators	-		\$25	-	-	-	-		\$50	
Freezers	-		\$25	-	-	-	-		-	
Energy Star Lighting	-		-	-	-	-	-		-	
Energy Audit	Free		Free		Free		Online tool		\$95	
Limited Income	Free	Up to \$9000 0% Interest	-	-	-	-	-	-	Free	-

Attachment 2.1

January 23, 2014

ENERGY EFFICIENCY INCENTIVE COMPARISON - 2014

UTILITY	ETO		EPUD		AustinEnergy		City of Boulder		City of Berkeley	
PROGRAM	Rebates	Loans	Rebates	Loans	Rebates	Loans	Rebates	Loans	Rebates	Loans
Heating Systems: Ducted and Ductless Heat Pumps	\$450-\$700		\$500 - \$1,000		\$600-\$800		\$550		Home Upgrade \$2,500 -\$4,500	N/A
Duct Sealing	\$150		\$500		\$200		-			
Air Sealing	-	Outsourced. No loan amounts provided.	N/A	\$5,000 - 0% interest loan	-		\$100			
Insulation	\$.25-.30 p/sq ft		.50 p/sq ft up to 70% of job cost		\$.15 - \$.35 p/sq ft attic only	Up to \$15,000 Outsourced	\$350 attic or wall	Up to \$25,000 Outsourced		
Windows	\$2.25-\$3.50 p/sq ft		\$5.00 p/sq ft up to 70% of job cost	\$4,000 0% loan	\$2.00 p/sq ft		-			
Home Performance	-						\$100-\$1,400			
Water Heater	\$75		\$25				-			
Heat Pump Water Heater	\$150-\$500		-		\$800		-		\$500	
Washers	\$25		\$50-\$70				-		\$75	
Refrigerators	\$50-\$75		\$15				-			
Freezers	\$15		\$15				-			
Energy Star Lighting	\$15		-				-		\$10-\$25	
Energy Audit	Free		Free		N/A		Up to 60% of the cost not to exceed \$200		At change of ownership with fee of \$100	
Limited Income	\$550-\$2,000	-	Free through HACSA	-	N/A	-	Free	-	Free	-

Attachment 2.1

January 23, 2014

Reference: July 2012 Policy Tools to Improve the Energy Efficiency of Rental Housing.

Location	Mandatory Improvement	Mandatory Disclosure	Rebates	Finance	Weatherization	Technical Assistance	Building Partnerships	Energy Audits	Marketing & Outreach
Austin	✓	✓	✓				✓	✓	✓
Berkeley	✓								
Boston			✓		✓	✓	✓	✓	
Boulder	✓	✓	✓	✓		✓			✓
Burlington	✓								
California		✓	✓			✓			
Cambridge			✓			✓			✓
Chicago			✓	✓		✓	✓	✓	
Cincinnati	✓			✓		✓	✓	✓	✓
Dubuque				✓			✓	✓	
Flagstaff					✓				✓
Kansas				✓				✓	
Knoxville			✓		✓				
Madison			✓	✓					✓
Maine		✓							
Marshfield						✓	✓	✓	✓
Maryland				✓			✓	✓	
Massachusetts	✓		✓				✓	✓	
Memphis	✓								
Minnesota	✓			✓					
New Bedford					✓	✓	✓		✓
New York	✓	✓					✓		✓
Omaha & Lincoln						✓			✓
Oregon			✓		✓	✓			
Philadelphia				✓					
Portland					✓		✓		
Richmond			✓			✓			
San Francisco	✓		✓	✓		✓		✓	
Seattle		✓	✓	✓	✓	✓			
Vermont			✓				✓		
Washington, DC		✓			✓				



By upgrading my rental property, I've been able to attract and retain great tenants.

*It's a
Good
Place*
TO BE

Rebates and zero-interest loans are available from Eugene Water & Electric Board on heat pump, window, and insulation upgrades for your rental properties.

The added comfort will increase the value of your investment property while helping to attract and retain the best tenants.



GET REBATES OR ZERO-INTEREST LOANS

— on —

- ductless heat pumps
- ducted heat pumps
- window upgrades
- insulation



Rebates up to \$750

Zero-interest loans up to \$9,000



eweb.org/saveenergy/rental
541-685-7199

Eugene Water & Electric Board
PO Box 10148
Eugene, OR 97440-2148



We upgraded our rental property with help from EWEB. Our tenants are happy, and we're happy they're going to stay.

Rebates and zero-interest loans are available from Eugene Water & Electric Board on heat pump, window, and insulation upgrades for your rental properties.

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- insulation



Rebates up to \$750

Zero-interest loans up to \$9,000



eweb.org/saveenergy/rental

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Rebates and zero-interest loans are available from Eugene Water & Electric Board on heat pump, window, and insulation upgrades for your rental properties.

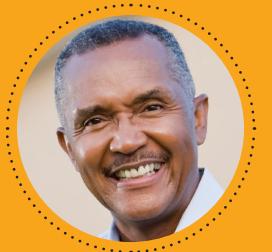
The added comfort will increase the value of your investment property while helping to attract and retain the best tenants.



GET REBATES OR ZERO-INTEREST LOANS

— on —

- ductless heat pumps
- ducted heat pumps
- window upgrades
- insulation



Rebates up to \$750

Zero-interest loans up to \$9,000



eweb.org/saveenergy/rental
541-685-7199

Eugene Water & Electric Board
PO Box 10148
Eugene, OR 97440-2148

July 1, 2012 - December 1, 2013	Written Complaint 16	Written Complaint 17	Written Complaint 18	Written Complaint 19	Written Complaint 20	Written Complaint 21	Written Complaint 22	Written Complaint 23	Written Complaint 24	Written Complaint 25	Written Complaint 26	Written Complaint 27	Written Complaint 28
Complaint Type	P,W,S,M	M,W,S,E	-	M,W	W,E,P,M	DEPOSIT	H,E,O	O	M,W,S,P	W,H,M,O	M,P,W	W,E,S,M,H	M,S,P
Inspection Req'd	Yes	Yes	No	Yes	Yes	-	Yes	-		Yes	Yes	Yes	Yes
Issue	P,W,S,M,E	M,W,S	-	M,W	Unfounded	-	H,E	Recycle Bins	N/A	Unfounded	M	W,E	M,S,P
Required to Correct	Yes	Yes	N/A	No/Info	No	-	Yes	N/A		No	No	Yes	Yes
Fix	Yes	Yes	-	-	N/A	-	Yes			N/A	Yes	-	Yes
Civil Penalty	Yes/\$640	No		-	N/A	-	No			N/A	No	-	No
Fixed w/in 10-day	No (8 mo.)	Yes	N/A	-	N/A	-	No			N/A	Yes	-	No
Repeat Owner	No	Yes	N/A	No/Info	No	-	No			No	No	No	Yes
Repeat Property Mgr	No	No	N/A	Yes	No	-	No			No	No	No	No
Status	Open	Closed	Open	Open									
No Code Authority/UBG	-	-	-	-	-	X	-	X	X (SPFLD)	-	-	-	-
Unfounded/Undetermined	-	-	X	-	X		-	-		-	-	-	-