

**Joint Comments on  
Energy Conservation Standards for Manufactured Housing  
Supplemental Proposed Rule**

**Docket EERE–2009-BT-BC-0021**

**November 26, 2021**

Thank you for the opportunity to comment on the supplemental notice of proposed rulemaking for the manufactured housing energy standard. The undersigned energy efficiency, environmental, housing, equity, business, and state government organizations support a strong energy efficiency standard that both helps the many low-income residents of these homes and reduces the homes' greenhouse gas emissions. Some of us may submit detailed comments and specific suggestions separately.

Manufactured homes are a vital affordable housing option—residents have a median household income around \$35,000. These families face high energy burdens and historically have had mortgage default rates as high as 54%. Manufactured housing standards also are an important part of federal residential energy and environmental policy, with almost 100,000 new manufactured homes shipped each year.

Thus, we urge you to consider the following points:

**The standard is long overdue and should be issued and implemented as soon as possible.**

Manufacturers have shipped more than 750,000 homes since the final standard was due in December 2011. Families in most of those homes will be paying energy bills that are far too high for decades. While we believe the draft standard should be improved, we urge you to complete the standard and ensure compliance as soon as possible.

**Residents of cheaper or smaller manufactured homes should not have low-quality homes due to a weak standard.** The “primary proposal” in the draft rule would allow a weak standard for lower-priced homes based on an arbitrary cap on first cost. Those who can least afford to pay high energy bills would continue to spend thousands of dollars on wasted energy and live in homes that are more drafty, have more condensation and mold, and hence are less safe and comfortable for decades to come.

All manufactured homes should be as efficient as is cost-effective based on total costs over the life of the homes. The standard and analysis should take into account both the construction costs and the full energy costs for those who can buy new homes, for renters, and for owners of older homes. Only 3% of low-income residents of manufactured homes own homes that are less than ten years old. And only 13% of low-income residents owe loan debt for their homes (including mortgages and chattel loans).

**The standard should include cost-effective energy-saving measures, including equipment.** The draft rule does not include the efficiency package options that account for much of the energy savings in the most recent model building energy code (2021 International Energy Conservation Code). Yet measures beyond the walls and roof, including efficient lighting, heating and cooling, water heating, appliances, and ducts could yield large cost-effective energy savings. Heat pumps could be especially beneficial by avoiding the cost of a furnace, air conditioner, and sometimes ducts while providing large carbon savings. Like the model code, the standard should ensure additional savings through prescriptive requirements and efficiency package options, tailored as needed for manufactured homes.

**The standard should protect resident health and safety.** Indoor air quality is a concern for manufactured homes. The standard should include ventilation and moisture control measures if needed to ensure that air sealing improves the health of residents.

If strengthened, this standard will help provide millions of good affordable homes and move forward on one important piece of an effective climate policy. We look forward to a standard that will protect residents and the climate.

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| Alliance to Save Energy                          | Northwest Energy Efficiency Alliance           |
| American Council for an Energy-Efficient Economy | Southeast Energy Efficiency Alliance           |
| E4TheFuture                                      | Southwest Energy Efficiency Project            |
| Earth Advantage                                  | Vermont Affordable Housing Coalition           |
| Elevate Energy                                   | Vermont Green Building Network                 |
| Environmental and Energy Study Institute         | Businesses for a Livable Climate               |
| Institute for Market Transformation              | California Businesses for a Livable Climate    |
| National Association of Energy Service Companies | Call to Action Colorado                        |
| National Association of State Energy Officials   | CatholicNetwork US                             |
| Next Step Network                                | Colorado Businesses for a Livable Climate      |
| NRDC   | Green House Connection Center                  |
| Prosperity Now                                   | I-70 Citizens Advisory Group                   |
| Responsible Energy Codes Alliance                | Montbello Neighborhood Improvement Association |
| Rewiring America                                 | North Range Concerned Citizens                 |
| RMI  | RapidShift Network                             |
| U.S. Green Building Council                      | Small Business Alliance                        |
| VEIC   | System Change Not Climate Change               |
| Energy Efficiency Alliance of New Jersey         | Unite North Metro Denver                       |
| Keystone Energy Efficiency Alliance              | Wall of Women                                  |
| Midwest Energy Efficiency Alliance               | Womxn from the Mountain                        |