

Congress of the United States
Washington, DC 20515

October 29, 2021

The Honorable Jennifer Granholm
Secretary
U.S. Department of Energy
1000 Independence Ave., SW
Washington DC. 20585

Dear Secretary Granholm:

We are writing regarding the Department of Energy's (DOE) proposed rule to establish energy conservation standards for manufactured housing pursuant to Section 413 of the Energy Independence and Security Act of 2007 (EISA). Although we support your overall goal of improving energy efficiency in the U.S. housing industry, we are concerned that, in its current form, the proposed rule would price thousands of Americans out of homeownership.

Currently, more than 22 million people in the United States live in manufactured homes. Manufactured homes offer individuals and families a housing option that is frequently much less expensive than a site-built home. Without land, the average cost of a new manufactured home is \$81,900, while the average cost of a new site-built home is \$299,415 – a significant difference that gives many more Americans the opportunity of owning their own home. Manufactured homes remain the only non-subsidized affordable homeownership option in the United States, which the White House this year acknowledged as an important part of the solution to address the shortage of affordable housing around the country.

As you know, EISA directs DOE to establish energy conservation standards for manufactured housing. The statute authorizes DOE to base the standard on the most recent version of the International Energy Conservation Code (IECC), except in cases in which the international code is not cost-effective based on the impact of the code on the purchase price and the total lifecycle operating costs.

Unfortunately, it appears that the proposed rule does not follow an accurate cost-benefit analysis required by EISA. In its current form, the proposed rule would require manufacturers to redesign most (if not all) of their existing floorplans to comply with standards concerning thermal systems and air and duct sealing. This would result in a significant price increase that would delay or prevent some potential manufactured homebuyers – whose median annual household income is around \$33,000 – from buying a home. We urge DOE to analyze closely the effective cost and impact of any proposed energy efficiency standard on those who are pursuing affordable homeownership.

Additionally, we are concerned that the proposed rule may conflict with statutory obligations contained within the National Manufactured Home Construction and Safety Standards Act, which establishes the Department of Housing and Urban Development (HUD) as

the primary regulator of construction and safety standards for manufactured housing. To change energy efficiency standards for manufactured housing, DOE is required by EISA to consult with HUD, which in turn can seek further counsel from the Manufactured Housing Consensus Committee (MHCCC). We request that you develop DOE's proposed rule and a subsequent implementation strategy in consultation with HUD and MHCC, in line with statutory requirements.

Energy efficiency and affordable homeownership are not mutually exclusive goals. We believe that this is an important endeavor and one that DOE's rules should support through a balanced energy efficiency standard that is crafted with careful consideration of the affordable housing needs of our nation. We therefore urge you to make substantial changes to the proposed rule to ensure that manufactured homes remain an affordable option for individuals and families across the country.

Sincerely,



David Kustoff
Member of Congress



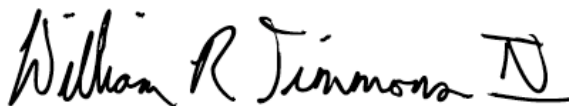
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Member of Congress



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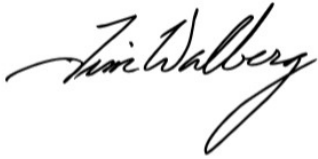
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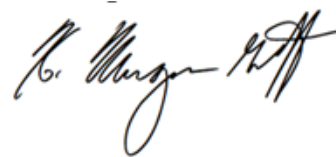
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