

Congress of the United States

Washington, DC 20510

February 7, 2024

The Honorable Kay Granger
Chairwoman
Committee on Appropriations

The Honorable Rosa DeLauro
Ranking Member
Committee on Appropriations

The Honorable Chuck Fleischmann
Chairman
Subcommittee on Energy and Water
Development, and Related Agencies
Committee on Appropriations

The Honorable Marcy Kaptur
Ranking Member
Subcommittee on Energy and Water
Development, and Related Agencies
Committee on Appropriations

Dear Chairwoman Granger, Ranking Member DeLauro, Chairman Fleischmann, and Ranking Member Kaptur:

Thank you for all your hard work this year throughout the appropriations process. We are hopeful that the manufactured housing energy standards limitation amendment sponsored by Rep. Norman and adopted by voice vote during House consideration of the FY 2024 Energy and Water Appropriations bill will remain included in the FY 2024 conference report.

As you know, the Norman amendment would prohibit funding for the Department of Energy's (DOE) rule titled "Energy Conservation Program: Energy Conservation Standards for Manufactured Housing."

We support standards that improve manufactured home energy efficiency and note that the industry is becoming more energy efficient, with over 30 percent of new homes Energy Star certified.

The promulgation of DOE energy standards for manufactured homes, however, is neither necessary nor appropriate. The Department of Housing and Urban Development (HUD) has, for almost fifty years, had exclusive jurisdiction over manufactured housing construction, safety, and energy standards. HUD is currently in the process of updating energy efficiency standards for new manufactured homes. The Norman amendment would correctly restore HUD as the exclusive federal agency responsible for manufactured home standards – instead of proliferating two conflicting sets of federal standards.

The energy standards developed by the HUD Manufactured Housing Consensus Committee (MHCC) in the fall of 2022 would accomplish almost all the energy efficiency benefits of the DOE standards, but without the crippling cost increases of around \$5,000 per home that DOE standards would impose on new manufactured homes. These stifling price increases on new

manufactured homes caused by the DOE standards will result in as many as 50,000 fewer homeowners over the next decade. Furthermore, the best measurement of cost effectiveness is the impact on the consumer, and the added mortgage and related costs to the homebuyer from the DOE standards price hikes exceed annual energy savings from the DOE standards for the homebuyer.

When the HUD MHCC considered the DOE proposed standards, it found them to be unworkable, for several reasons:

- (1) The DOE standards are based on building code standards (IECC) which were designed for site-built homes that are completely incompatible with manufactured homes built in a factory and with the HUD code, which is performance-based.
- (2) DOE failed to follow HUD's previous recommendation to include the substantial cost of testing, enforcement, and regulatory compliance in its statutorily required cost-benefit analysis.
- (3) The DOE standards did not take into consideration current construction methods and transportation requirements for manufactured homes.

DOE should not move forward with conflicting standards and enforcement, which would create significant problems for industry compliance.

Therefore, we support the Norman amendment, as this is the fastest way to achieve final approval of improved federal energy efficiency standards for new manufactured homes. Litigation has plagued adoption of manufactured housing energy efficiency standards since the Energy Independence and Security Act of 2007, due to the conflicts inherent in two agencies promulgating different standards. Adoption of the Norman amendment would expedite the process by restoring HUD's exclusive jurisdiction in this area.

For all these reasons, we respectfully ask that the Norman manufactured housing limitation amendment be included in the final DOE Appropriations conference report.

Thank you for your consideration.

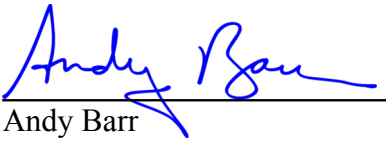
Sincerely,



Ralph Norman
Member of Congress



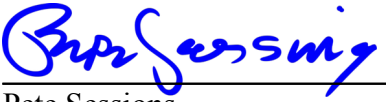
Byron Donalds
Member of Congress



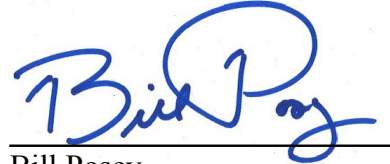
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Member of Congress



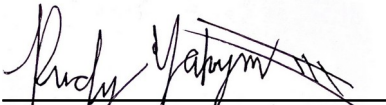
John Rose
Member of Congress



Pete Sessions
Member of Congress



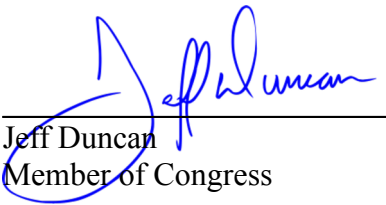
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Rudy Yakym III
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Mike Flood
Member of Congress



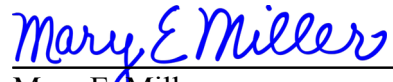
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Member of Congress



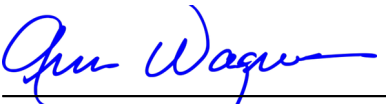
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Member of Congress



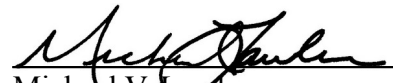
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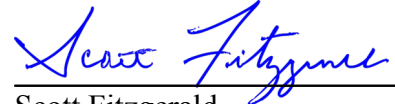
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