



Preserving the American Dream of Home
Ownership Through Regulatory Reform

MHARR

NEWS

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**FOIA DOCUMENTS CONFIRM MILLIONS IN DOE
PAYMENTS TO SBRA MANAGEMENT COMPANY**

Washington, D.C., September 22, 2016 – The U.S. Department of Energy (DOE), responding to a May 10, 2016 Freedom of Information Act (FOIA) request filed by the Manufactured Housing Association for Regulatory Reform (MHARR), has produced documents showing that \$1,606,348.00 was paid by DOE to The Levy Partnership, Inc. (TLP) between 2012 and 2015 for work on DOE “research” contracts. TLP describes itself as “the general support contractor for the Systems Building Research Alliance (SBRA),” the alleged “non-profit research organization of the factory-built housing industry.” According to documents filed by TLP with the U.S. General Services Administration (GSA), TLP is responsible for “coordinating all of [SBRA’s] administrative and technical functions,” and has “managed SBRA since its inception.”

These payments to TLP, under multiple Task Orders issued by DOE through its National Renewable Energy Laboratory (NREL) in Golden, Colorado beginning in January 2012 and continuing through October 2015, preceded and overlapped with the time period that SBRA and its Executive Director (who was simultaneously President of TLP) were appointed by DOE to serve on the DOE Manufactured Housing Working Group (MHWG) which – through a process of supposed “negotiated rulemaking” -- developed the basis for the disastrous proposed DOE manufactured housing “energy conservation” rule, issued on June 17, 2016.

As is extensively detailed in MHARR’s comprehensive August 8, 2016 comments opposing the proposed DOE rule, SBRA provided extensive technical input and analysis in connection with the truncated and fundamentally-tainted proceedings of the MHWG, as well as key cost information inputs from unidentified, non-transparent sources. At no point in the MHWG process, though, did DOE disclose either the fact – or the extent – of its payments to TLP, TLP’s symbiotic relationship with SBRA, and the potential conflict of interest involved in those relationships. MHARR, ultimately, cast the only “no” vote against the MHWG “Term Sheet” that became the basis for DOE’s June 17, 2016 proposed rule.

SBRA, moreover, over the same period that TLP was receiving these DOE payments, acted to promote DOE manufactured housing energy regulation, such as in a presentation at the April 2015 Manufactured Housing Institute (MHI) National Congress and Expo, entitled “Energy Standards: From Laggard to Leader.” Among other things, that presentation – with slides bearing the logo of the “Systems Building Research Alliance” – touted potential approaches to increased manufactured housing energy regulation, utilizing technologies developed with DOE funding, including so-called “Advanced Roof Prototyping” (NREL subcontract KNDJ-0-40347-05) and “Advanced Walls Prototyping” (NREL subcontract KNDJ-0-40347-04).

Manufactured Housing Association for Regulatory Reform

MHARR, as part of its aggressive opposition to the DOE proposed manufactured housing “energy” rule, will continue to press for additional information concerning relevant aspects of the sham DOE process leading to the June 17, 2016 proposed rule.

The Manufactured Housing Association for Regulatory Reform is a Washington, D.C.-based national trade association representing the views and interests of independent producers of federally-regulated manufactured housing.