

To: Building Science Community
From: Michael Lubliner
Subject: USDOE Rulemaking on Energy Standards for HUD-code Manufactured Housing
Date: July 28, 2016

Background

Roughly 50,000 to 250,000 new HUD-code manufactured homes are built and sited in the U.S. every year. Current production is under 100,000, but this number is growing. These homes are built in roughly 100 to 120 housing factories. Most factories are owned by a small number of corporations, including Clayton Homes, CAVCO Industries, Champion, and Skyline.

Updates to federal manufactured housing energy efficiency standards are long overdue

The national HUD Manufactured Housing Construction and Safety Standards (MHCSS) preempt state energy and building codes. The existing energy standards in HUD-MHCSS, which have not been updated since 1994, allow single-pane windows, R11 floors, R22 roofs, and R11 walls in many U.S. climate zones. Federal legislation in 2008 requires that DOE take responsibility away from HUD and update manufactured housing energy efficiency standards.

Please consider supporting stakeholder comments to DOE's Notice of Proposed Rule for Manufactured Housing Energy Conservation Standard

I'm encouraging members of the building science community to consider supporting stakeholder comments to DOE's Notice of Proposed Rule (NOPR) regarding energy efficiency standards for HUD-code manufactured housing. **Comments are due by August 16, 2016.** I'm working with stakeholders who plan to submit joint comments. If you are interested in supporting our comments, please email me ASAP; I will send you a link so you can sign on and indicate your support. I also encourage you to consider providing your own comments.

NOPR information: https://www1.eere.energy.gov/buildings/appliance_standards/rulemaking.aspx?ruleid=97

The DOE worked with a broad group of stakeholders (ASRAC) to reach consensus on these proposed updated energy efficiency standards. The NOPR more closely aligns the HUD-code with I-codes for site-built housing regulated by state building codes. I'm happy to discuss this effort with you at the 2016 Westford Symposium. **This future is this:**



OR



THIS?

Best Regards,

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