

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

**Docket EERE-2009-BT-BC-0021**

As members of the Appliance Standards and Rulemaking Federal Advisory Committee Manufactured Housing Working Group and other stakeholders, we support the proposed rule. While some of us will submit detailed comments and specific suggestions separately, we would like to emphasize that overall the proposed rule is consistent with the Working Group consensus agreement and with the statutory requirements, and will save significant amounts of energy with benefits to homeowners, the electric grid, and the environment. Thus we urge you to finalize and issue the standard as soon as possible.

In particular we support, consistent with the Working Group term sheet:

- The climate zones, which will facilitate implementation while accounting for climate impacts,
- Separate performance standards for single- and multi-section homes,
- Including options of prescriptive component standards and performance standards based on overall U-factors,
- The component and overall standard levels that were included in the Working Group term sheet,
- Prescriptive thermal sealing requirements in light of the difficulty of performance testing in the factories
- Performance duct leakage requirements, which also recognize the differences in manufacturing homes,
- Requirements for thermostats and controls, and
- Equipment sizing requirements.

We also support the proposed one-year period before the rule becomes effective as an appropriate balance between the urgency of implementing this overdue standard and the work required of manufacturers to revise and get approval for their home designs and to implement changes. We urge the Department of Energy to move quickly to address compliance and enforcement of the standard with full opportunity for stakeholder input. And we hope the department will provide training and technical assistance to help manufacturers comply with the new standard and will monitor overall compliance with and effectiveness of the standard, especially during an initial implementation period.

When implemented, the standard promises substantial benefits despite the added home costs. Using the same assumptions used for the Working Group, the Department of Energy estimated owners of manufactured homes will save money in each of the nineteen locations they examined, with lifetime average net savings of \$3,211 for single-section homes and \$4,625 for multi-section homes. The standard is estimated to reduce electric demand from these homes by over 25%, and to reduce cumulative carbon dioxide emissions from power plants by 158 million metric tons.

Thank you for the opportunity to comment, and we look forward to working with you to implement the final standard as soon as possible.

[Organization names]