



Transmitted via email and U.S. Mail

March 14, 2014

Ms. Kathleen B. Hogan  
 Deputy Assistant Secretary for Energy Efficiency  
 U.S. Department of Energy  
 Room 6A-067, Mail Stop EE-1  
 100 Independence Avenue, S.W.  
 Washington, D.C. 20585

Dear Ms. Hogan:

On behalf of the Manufactured Housing Institute (MHI), the national trade association representing all sectors of the manufactured housing industry, including manufacturers representing almost eighty percent of the production, retailers, suppliers, lenders and community owners, I am writing to respectfully request that Department of Energy (DOE) consider negotiated rulemaking for the establishment of energy efficiency standards for manufactured housing. As you know, a draft Notice of Proposed Rulemaking (NPR) has been pending at the Office of Management (OMB) since December, 2011. In June, 2013, DOE published a Request for Information (RFI) seeking additional information (Docket EERE-2009-BT-BC-0021; RIN 1904-AC11).

DOE has established the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) to provide advice and recommendations to address, among other things, "specific issues of concern to DOE as requested by the Secretary of Energy, the Assistant Secretary for Energy Efficiency and Renewable Energy (EERE), and the Building Technologies Program Manager." MHI believes ASRAC is an appropriate mechanism to engage all stakeholders in a discussion of energy efficiency standards for manufactured housing and to develop consensus recommendations for long overdue changes to the current energy standards for manufactured homes. It is a pragmatic approach that has the potential to achieve a timely resolution to this issue.

MHI and its members would be delighted to participate and support such an effort. We have taken first steps to achieve consensus on new energy standards by participating with other energy stakeholders in the development of joint comments to DOE in response to its June RFI. We also strongly support efforts to engage the Department of Housing and Urban Development (HUD) and the Manufactured Housing Consensus Committee (MHCC). The MHCC is the Federal Advisory Committee established to recommend and consider all changes to the Manufactured Housing Construction Standards and Regulations. (42 U.S.C. 5401et seq. and 114 Stat. 2997 et. seq.). As you know, HUD has regulatory authority over the development and enforcement of the Manufactured Housing Construction and Safety Standards, including energy efficiency standards.

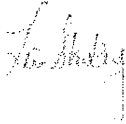
The ASRAC process would be the pragmatic and efficient approach to establishing recommendations for new energy efficiency standards for manufactured housing provided that DOE:

- \* Uses the process for effective communication and data gathering, and for seeking general consensus for key elements of a standard and regulatory framework.
- \* Establishes a tight meeting schedule with a minimum of meetings.
- \* Considers using the draft NPR and Technical Support Documents for opening discussion.

- Commits a strong project leader and an ASRAC subcommittee that is comprised of a balanced group, who have the time and expertise to serve in a meaningful capacity;
- Appoints a strong facilitator to ensure the effective flow of information, and restrict time spent on repetitive or non-germane discussion, and;
- Provides prompt, effective lab analysis (e.g., running scenarios through their cost-effectiveness, national impacts and other models in advance of meetings).

Thank you in advance for your consideration of this request, and we look forward to hearing from you at your earliest convenience.

Sincerely,



Lois Starkov, Vice President  
Regulatory Affairs

CC: Roland J. Risser, Office of Building Technologies Program

Natural Resources Defense Council • California Energy Commission •  
National Manufactured Home Owners Association • National Association of State  
Energy Officials • Manufactured Housing Institute • Corporation for Enterprise  
Development • Environmental and Energy Study Institute • Systems Building Research  
Alliance • National Rural Electric Cooperative Association • Washington State  
University Ext Energy Program • American Council for an Energy-Efficient Economy •  
Northwest Energy Efficiency Alliance

May 28, 2014

To: Members of the Appliance Standards and Rulemaking Federal Advisory Committee  
(ASRAC)

*Sent via email to ASRAC Designated Federal Officer, [ASRAC@ee.energy.gov](mailto:ASRAC@ee.energy.gov)*

Re: Energy Efficiency Standards for Manufactured Housing

We are pleased that energy efficiency in manufactured housing is on the agenda for ASRAC's June 6 meeting, and are writing to express our support for ASRAC's efforts on this topic.

As you may know, a draft Notice of Proposed Rulemaking (NOPR) has been pending at the Office of Management and Budget since 2011, and DOE published a Request for Information (RFI) seeking additional information in June 2013. We note that the revised standards are long overdue, and have been working jointly with diverse stakeholders following the RFI with the aim of accelerating the process to a successful standard.

We believe that ASRAC is an appropriate mechanism to engage stakeholders in a discussion of energy efficiency standards for manufactured housing, and to develop recommendations for long overdue changes to the current standards. An ASRAC process would facilitate even greater communication and importantly, also provide analytic support, both of which we believe would be helpful to the timely resolution of remaining issues.

In order to ensure that an ASRAC process is as pragmatic and efficient as possible, we recommend that DOE:

- Use the process for effective communication and data gathering, and for seeking general consensus where possible for key elements of a standard and regulatory framework, e.g., including on U-value, air infiltration, window specifications and enforcement.
- Establish and hold to a tight meeting schedule with a minimum of meetings, e.g., 2 two-day meetings to be concluded by September.
- Consider using the draft NOPR and Technical Support Documents for opening discussion, i.e., distributed in advance of the first meeting.
- Commit a strong project leader and an ASRAC subcommittee that is comprised of a balanced group, who have the time and expertise to serve in a meaningful capacity;

- Appoint a strong facilitator to ensure the effective flow of information, and restrict time spent on repetitive or non-germane discussion, and;
- Provide prompt, effective analysis (e.g., running scenarios through their cost-effectiveness, national impacts and other models in advance of meetings).

Thank you in advance for your consideration, and we look forward to your further efforts.

Respectfully submitted,

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