## Draft of pending article on 7.15.2025 for Al fact check.

Politico Pro's EnergyWire on DOE 'Mobile Home' Energy Rule; Their Claims plus MHI-MHARR-DOE-FedRegister-Gemini on Manufactured Housing Energy Rule Provided-Unpacked; Comprehensive MHVille FEA

"A manufactured home is not a motor home or trailer, and although it is often called a "mobile home," it is not that either," said the NFPA. With that in mind, left-leaning POLITICO Pro via their ENERGYWIRE said on 7.3.2025: "The Department of Energy is delaying a landmark rule to increase the efficiency of **mobile homes**, a move it says will help businesses ..." But the headline on that Politico Pro Energywire article by Christa Marshall said: "DOE halts first-ever efficiency rule for mobile homes," a statement that is arguably false/misleading on multiple levels (see Part I and Part VI for details). According to her bio in brief on their site, Marshall is "A graduate of Columbia University's Graduate School of Journalism, she formerly worked for The Denver Post and NPR. Energywire Editor..." The Denver Post and NPR are also deemed to be <u>left</u>-leaning publications by analysts as shown. POLITICO Pro's Energywire says about itself: "Energywire is the key source of news across the energy sector." There is no apparent response or pushback by the Manufactured Housing Institute (MHI) to Christa Marshall's article, elements of which will be provided in Part I and which will be further examined in Part VI, as noted. The DOE's press release on the DOE energy rule is provided in Part II as will select remarks plus a link to the full and official Federal Register's statement on the DOE manufactured housing energy rule implementation delay. Google is still the most popular search engine on the planet, and on this date Google's autogenerated AI response to the DOE Energy Rule for manufactured housing will be provided in Part IV. The Manufactured Housing Association for Regulatory Reform (MHARR), which was cited by Gemini in its statement on the DOE energy rule delay, is provided in Part V. More MHVille facts-evidence-analysis (FEA) which will include insights from Bing's AI powered Copilot plus MHProNews commentary are found in Part VI.

It will be recalled that part of what DOGE announced earlier this year as a cut was subscriptions by federal agencies to <u>left</u>-leaning *Politico Pro*. Per an X-post shown below.

LEAVITT: DOGE is ensuring that US taxpayers funding legacy media propaganda outlets is FINISHED:

"The DOGE team is working on canceling those payments NOW." "I can confirm that the more than 8 million taxpayer dollars that have gone to essentially subsidizing subscriptions

to Politico on the American taxpayers dime will no longer be happening." "Again, this is a whole of government effort to ensure that we are going line by line when it comes to the federal government's books. And this president and his team are making decisions across the board on do these receipts serve the interests of the American people? Is this a good use of the American taxpayers money?"

That post is as shown.

**LEAVITT:** DOGE is ensuring that US taxpayers funding legacy media propaganda outlets is FINISHED:

"The DOGE team is working on canceling those payments NOW."

"I can confirm that the more than 8 million taxpayer dollars that have gone to essentially subsidizing subscriptions to... pic.twitter.com/YzLYwppXPi

— Western Lensman (@WesternLensman) February 5, 2025

Put differently, this aims to be the most comprehensive and complete look at this topic and its implications for the affordable housing crisis in general, and manufactured housing more specifically, will be provided and unpacked with industry expert <u>analysis</u> in Part VI. Statements from sources such as Politico Pro/Energywire, MHI, Gemini, Copilot, etc. are provided under <u>fair use guidelines</u> for <u>media</u>. The formal statement by MHARR is provided herein by *MHProNews* with their permission as it is <u>their MHARR press release</u>.

Part I - From Politico Pro's Energywire

DOE halts first-ever efficiency rule for mobile homes

By Christa Marshall | 07/03/2025 06:47 AM EDT

It had been scheduled to take effect July 1. Industry observers worry it could be delayed indefinitely.

The Department of Energy is delaying a landmark rule to increase the efficiency of mobile homes, a move it says will help businesses even as environmentalists say it will spike costs for low-income Americans.

In a <u>final regulation</u> in the Federal Register on Wednesday, DOE said it was punting the compliance date for the 2022 rule for new multisection manufactured homes — which make up the majority of mobile models — to 180 days after yet-to-be-released

enforcement guidelines. With no set timeline on releasing the guidelines, the rule could be delayed indefinitely, according to industry observers.

"This rulemaking fulfills our commitment to lift the excessive pressure imposed on the manufactured housing industry by the previous administration," said Principal Deputy Assistant Secretary for Energy Efficiency and Renewable Energy Lou Hrkman in a statement. "The Department is working hard to provide the American people some relief as we work toward a permanent regulatory framework that benefits both consumers and manufacturers."

In a prepublication notice, DOE said it was freezing the rule — the first-ever at the department on manufactured homes — to allow "more time to consider the proposed enforcement procedures and comments submitted, and to evaluate appropriate next steps that provide clarity for manufacturers." The Biden-era rule had been scheduled to take effect on July 1.

Part II From the DOE press release and then from the official Federal Register

# **Energy Department Issues Final Rule Delaying Compliance Deadline for Manufactured Housing Standards**

Manufacturers of multisection homes are no longer required to meet July 1, 2025, compliance deadline for energy-conservation standards

Office of Energy Efficiency & Renewable Energy

July 1, 2025

**WASHINGTON**—The U.S. Department of Energy (DOE) issued a final rule delaying the July 1, 2025, deadline for compliance with energy-conservation standards for manufactured housing. Manufacturers of multi-section homes will now have 180 days from the publication of corresponding enforcement procedures to comply with DOE standards.

"This rulemaking fulfills our commitment to lift the excessive pressure imposed on the manufactured housing industry by the previous administration," said Principal Deputy Assistant Secretary for Energy Efficiency and Renewable Energy Lou Hrkman. "The Department is working hard to provide the American people some relief as we work toward a permanent regulatory framework that benefits both consumers and manufacturers."

On April 22, 2025, DOE <u>issued a Notice of Proposed Rulemaking</u> and solicited public feedback on the proposal to extend the compliance deadline. Having finalized the

rulemaking, DOE will gather feedback from manufacturers, ensure industry stakeholders understand its enforcement procedures, and consider its next deregulatory action.

For further details, read the <u>full text of the final rule</u>

*MHProNews* notes that the MHARR website provided the related <u>Federal Register</u> document at this link here. About the Fedeal Register, according to GovInfo.gov:

# What is the Federal Register?

Published by the Office of the Federal Register, National Archives and Records Administration (NARA), the Federal Register is the official daily publication for rules, proposed rules, and notices of Federal agencies and organizations, as well as executive orders and other presidential documents.

With that backdrop are the following pull quotes from the Federal Register document found at this link here.

Comment: Manufactured Housing Association for Regulatory Reform

("MHARR") commented that it supports an indefinite extension and delay of the implementation and compliance dates for both the Tier 1 and Tier 2 energy standards. In addition, MHARR reiterated positions previously submitted to the Department regarding DOE's initial extension proposal, and through which MHARR advocated for extending the energy standards compliance date, stressing that it is necessary to develop comprehensive testing, enforcement, and regulatory compliance criteria, which are essential components of any standard. They also commented requiring compliance would help provide clarity to manufacturers. DOE is extending the compliance date here consistent with its intent that the Tier 2 compliance deadline occurs after both the Tier 1 compliance deadline and the promulgation of final enforcement procedures.

A delay of the July 1, 2025, compliance date is therefore necessary to ensure that DOE can evaluate and incorporate meaningful stakeholder feedback regarding appropriate next steps for the manufactured housing standard enforcement procedures, while still providing appropriate lead time for compliance.

#### III. Overview of the Final Rule

#### A. Summary of Public Comments

**TABLE 2025 NOPR WRITTEN COMMENTS** 

Commenter(s) Document No.

Individual*.	
Individual	EERE-2009-BT-BC-0021- 2642
Manufactured Housing Association for Regulatory Reform	EERE-2009-BT-BC-0021-
Individual.	2643
Manufactured Housing Institute	EERE-2009-BT-BC-0021- 2644
Joint Comments:	EERE-2009-BT-BC-0021-
American Council for an Energy Efficiency Economy, American Institute	2645
of Architects, Americans for Financial Reform Education Fund, E4TheFuture, Earth Advantage, Earthjustice, Institute for Market	EERE-2009-BT-BC-0021-
Transformation, Lincoln Institute of Land Policy, Next Step Network,	2647
Northeast Energy Efficiency and Electrification Council, NPHS, ROC USA,	EERE-2009-BT-BC-0021-

2646

DOE received public comments in response to the April 2025 NOPR from the organizations and interested parties identified in the table below. These comments are available for review in the public docket for this rulemaking. The specific issues relating to the NOPR and this final rule are addressed in the following section ("Discussion of Public Comments Received").

Sierra Club, Vermont Law and Graduate School, Institute for Energy and

the Environment.

#### **B. Discussion of Public Comments Received**

Comment: Two commenters (Abigail Johnson and an anonymous individual) expressed opposition to DOE's proposal to delay the Tier 2 compliance date. The anonymous commenter recommended not delaying the energy conservation standards for manufactured housing because the rule will help reduce waste, fraud, and abuse by developers, realtors and government officials interested in protecting the fossil fuel industry. (Anonymous, No. 2642 at p. 1) Abigail Johnson opposed this extension based on an expressed concern with deregulation and with the executive order that prompted this change as it relates to manufactured housing. She noted that the current standards were established in 2023 and believed there has been sufficient time to figure out a system of enforcement. Further, she stated stricter standards are necessary to address the climate crisis, and also expressed concern with federal workforce reduction in the area of regulation and safety and that a delay of the conservation deadline may make it an evermoving goal with no actual implementation. (Abigail Johnson, No. 2643 at p. 1)

<sup>\*</sup> Comment submitted anonymously.

Response: Although DOE understands the commenters' interest in enforcing the standards, DOE's conclusion, consistent with that in the May 2023 Final Rule, is that compliance with the standards is better accomplished by first having enforcement procedures in place to provide added clarity to manufacturers.

Comment: Manufactured Housing

Association for Regulatory Reform

("MHARR") commented that it supports an indefinite extension and delay of the implementation and compliance dates for both the Tier 1 and Tier 2 energy standards. In addition, MHARR reiterated positions previously submitted to the Department regarding DOE's initial extension proposal, and through which MHARR advocated for extending the energy standards compliance date, stressing that it is necessary to develop comprehensive testing, enforcement, and regulatory compliance criteria, which are essential components of any standard. They also commented that the extension is crucial to effectively consider the costs of these measures, both individually and in relation to the overall expenses of manufactured housing energy standards and enforcement procedures. MHARR also referenced pending litigation surrounding DOE's energy conservation standards for manufactured housing filed in the Western District of Texas. While MHARR commented it supports extending and delaying manufactured housing energy standards implementation, they also maintain the May 2022 Final Rule standards are fundamentally flawed and should be completely withdrawn, not just postponed. They argue that these standards are detrimental to the manufactured housing industry and hinder affordable homeownership for lower and moderate-income Americans. MHARR advocates for crafting a new, costeffective rule in collaboration with U.S. Department of Housing and Urban

#### Development ("HUD") and its

Manufactured Housing Consensus Committee ("MHCC"), encompassing both the standards and regulatory compliance procedures. (MHARR, No.

2644 at p. 2-3)

Response: DOE agrees with the commenter that it is necessary to amend the compliance date for Tier 2 homes. DOE understands that, while 3 years have passed since the May 2022 Final Rule, many manufacturers may need additional time to adjust their manufacturing practices and ensure homes are compliant with the updated standards and in a manner consistent with the forthcoming enforcement procedures. The extended compliance lead time established under this final rule will provide additional time for DOE to issue its enforcement procedures, and for manufacturers to continue modifying their practices in anticipation of complying with the standards. DOE addresses the additional

information the commenter provided regarding the substance of the standards at the end of this section.

Comment: Fourteen organizations—a combination of energy efficiency, affordable housing, academic, and environmental organizations—together filed joint comments ("Joint Commenters") expressing opposition to DOE's proposed compliance date extension. These organizations contend that the delay will lock-in low-to moderate-income families into higher utility bills and cause unnecessary increased peak demand on the utility grid, particularly in rural areas. They also noted manufacturer facilities are already capable of complying with the DOE energy conservation standards for manufactured housing and stated that the nation's largest manufacturer has switched all 39 factories in the U.S. to build Zero Energy Ready Homes, which achieved levels of energy efficiency and performance far better than DOE's minimum standard for manufactured homes. The Joint Commenters stated they would like to retain the fixed date for compliance to avoid lengthy delay of enforcement and, if DOE cannot maintain a fixed date for compliance, any delay tied to publication of enforcement procedures should be consistent with that for Tier 1 homes, that is at no more than 60 days after enforcement procedures are finalized (i.e., the same timeline for both Tier 1 and 2 homes). Additionally, the Joint Commenters would like DOE to begin work on strengthening standards based on the 2024 International Energy Conservation Code (IECC) and further assist manufacturers with building Zero Energy Ready Homes.

Response: DOE disagrees that additional time is unwarranted for manufacturers to comply with the updated energy conservation standards. While many manufacturers may indeed be able to comply with the standards now, some manufacturers may not have a clear picture as to how DOE will evaluate compliance or conduct enforcement procedures. As noted in the April 2025 NOPR, DOE believes that having enforcement procedures in place prior to requiring compliance would help provide clarity to manufacturers. Accordingly, DOE has determined that a delay of the compliance date until after promulgation of enforcement procedures is warranted because DOE believes that clear standards with workable enforcement procedures will best support the full realization of the benefits associated with its energy conservation standards. DOE notes that some benefits (both monetary and nonmonetary) may be sacrificed in delaying implementation of the standards, as highlighted by the commenter. However, these net benefits also require additional upfront costs paid by homeowners, which can also have a significant impact on housing affordability. Potential benefits may also not be fully realized if manufacturers do not fully comply with the amended standards and lack clarity on associated enforcement processes. With respect to the difference between the compliance dates for Tier 1 and Tier 2 homes, DOE has previously recognized that the Tier 2 standards are inherently more

stringent (compared to the Tier 1 standards), and has determined that additional time is warranted for manufacturers to make adjustments to their operations and practices to ensure compliance with the Tier 2 standards.

...

MHProNews again notes that the full 6 pages per the Federal Reserve PDF are as found at this link here.

**Part III** - From the Manufactured Housing Institute (MHI) website is the following (MHProNews Notes: Quoting MHI should NOT be construed as an endorsement of that trade group by MHProNews. Their information is provided for balance and accuracy in reporting, as are other items in this report)

#### **Posts**

**BREAKING NEWS: DOE Announces Delay of Compliance Date for Energy Standards** 

#### **Date Published**

July 1, 2025

#### **News Type**

#### **Industry News**

Today, the Department of Energy (DOE) <u>announced</u> that the Tier 2 compliance date for its manufactured housing energy conservation standards is being delayed. Originally, manufacturers had to comply with these standards on and after July 1, 2025, for Tier 2 homes and 60 days after the issuance of enforcement procedures for Tier 1 homes.

Under the new rule, the Tier 2 home compliance date changes from July 1, 2025 to 180 days after DOE's publication of its final enforcement procedures. The existing compliance date for Tier 1 homes will remain unchanged at 60 days after publication of DOE's final enforcement procedures. MHI has been a leading voice and advocate in favor of this delay, noting the importance of the compliance date coming after the testing, compliance, and enforcement provisions are finalized and for Tier 1 compliance to come before Tier 2.

MHI praises the Trump administration for taking action to delay the compliance date for fundamentally flawed energy conservation standards for manufactured housing which threatened to reduce affordable housing supplies and raise housing costs for American households. Today's action supports both affordable housing and American manufacturing jobs, and buys time to reevaluate the approach taken by the prior administration to energy

conservation standards for manufactured housing which were serving neither the interests of energy efficiency, nor affordable housing. We will continue to work with the Trump administration and members of Congress on a bi-partisan basis to address the fundamental flaws in the statute and streamline confusing and duplicative regulations with the goal of reducing the costs of owning and operating a home.

## Part IV From Google's AI generated statement on this date

The Department of Energy (DOE) has delayed the compliance date for its manufactured housing energy conservation standards. The new rule delays the Tier 2 (multi-section) homes compliance date to 180 days after the publication of the DOE's final enforcement procedures. The compliance date for Tier 1 (single-section) homes remains unchanged at 60 days after the publication of the enforcement procedures. This delay provides the manufactured housing industry with more time to prepare for the new standards and allows for the development of enforcement procedures that are clear and feasible for manufacturers, retailers, and consumers.

Here's a more detailed breakdown:

#### Initial Rule:

The DOE previously finalized energy conservation standards for manufactured housing, with a compliance date of July 1, 2025, for Tier 2 homes.

#### Proposed Delay:

In response to industry feedback and concerns about the feasibility of meeting the initial deadline, the DOE proposed a delay.

#### Final Rule:

The DOE has now issued a final rule delaying the compliance date for Tier 2 homes to 180 days after the publication of final enforcement procedures.

#### Enforcement Procedures:

The DOE is working on developing and finalizing these enforcement procedures, which will outline how the agency will ensure compliance with the energy standards.

#### • Industry Response:

The <u>Manufactured Housing Institute</u> (MHI) has been a vocal advocate for this delay, emphasizing the need for clear enforcement procedures before the standards take effect.

#### MHARR's Stance:

The <u>Manufactured Housing Association for Regulatory Reform</u> (MHARR) has also been a key voice in advocating for the delay and is pushing for the standards to be withdrawn entirely, citing concerns about affordability and the potential impact on the industry.

MHProNews notes that while useful, the Gemini statement is arguably incomplete and thus potentially misleading. There is, for example, no clear statement by Gemini that MHI was part of "negotiated rule making" with DOE some years ago asking for a rule to be put into effect. Meaning, MHI's stance has been inconsistent at best, or misleading and deceptive at worst. See Part V and VI for details. Gemini cited MHARR, which is notable and useful, but failed to note that MHARR's Danny Ghorbani, a former MHI Vice President and MHARR's found president and CEO, has pointed to that apparent duplicity by MHI on the DOE energy rule, see that at this link here.

**Part V** From the Manufactured Housing Association for Regulatory Reform (MHARR) press release found at this link here



# DOE Issues Final Rule Delaying Energy Rule Compliance Date for "Tier 2" Manufactured Homes –





**JULY 2, 2025** 

TO: MHARR MANUFACTURERS

**MHARR STATE AFFILIATES** 

MHARR TECHNICAL REVIEW GROUP (TRG)

FROM: MHARR

RE: DOE ISSUES FINAL RULE DELAYING ENERGY RULE

**COMPLIANCE DATE FOR "TIER 2" MANUFACTURED HOMES** 

The U.S. Department of Energy (DOE) has issued a final rule delaying the manufactured housing "energy conservation" standards compliance date for so-called "Tier 2" homes until 180 days after the publication of "corresponding enforcement procedures." The final rule was initially announced by DOE in a news release issued on July 1, 2025 (copy attached) and then published in the Federal Register on July 2, 2025 (copy attached). As published, the final delay rule will be effective immediately.

Publication of the Federal Register notice effectively renders moot a Temporary Restraining Order (TRO) on enforcement of the DOE standards issued on June 30, 2025 by the court hearing the federal challenge to the validity of those standards. The TRO had provided that it would "expire of its own force upon ... publication [i]n the Federal Register of the Department of Energy's ... delay rule...."

While MHARR had supported the extension of the compliance date for "Tier 2" standards, it has aggressively sought – and continues to aggressively seek – including at a meeting just

yesterday, on July 1, 2025 with DOE Principal Deputy Assistant Secretary for Energy Efficiency and Renewable Energy, Lou Hrkman, that the manufactured housing energy standards rule be withdrawn totally. MHARR will report additional key details of this meeting in the Association's Washington Update to be published after the July 4 holiday.

MHARR's <u>consistent opposition to the DOE standards</u> is duly noted in the July 2, 2025 Federal Register final extension rule. In that document, DOE states:

"While MHARR commented it supports extending and delaying manufactured housing energy standards implementation, they also maintain the May 2022 Final Rule standards fundamentally flawed and should be completely withdrawn, not just postponed. They argue that these standards are detrimental to the manufactured housing industry and hinder affordable homeownership for lower and moderate-income Americans. MHARR advocates for crafting a new, cost-effective rule in collaboration with [the] U.S. Department of Housing and Urban Development and its Manufactured Housing Consensus Committee, encompassing both the standards and regulatory compliance procedures.

Response: DOE agrees with the commenter that it is necessary to amend the compliance date for Tier 2 homes."

<u>See</u>, 90 Federal Register No. 125, July 2, 2025 "Energy Conservation Standards for Manufactured Homes," p. 28873 at pp. 28875-28876. As to MHARR's broader objection to the standards, DOE maintains that such objections are beyond the scope of the extension rulemaking, <u>per se</u>, but indicates in its notice that such organic opposition points may be considered in a further rulemaking on the substance of the standard – a further action that MHARR will continue to demand.

In this connection, it bears reiteration that MHARR is the only national industry trade organization to consistently oppose DOE regulation of manufactured housing energy issues as well as every iteration of the DOE energy standards rule proposal since the baseless and corrupted DOE "negotiated rulemaking" scam. As reported previously, MHARR cast the only "no" vote against the proposed standard and "term sheet" developed in that process, while MHI supported both the negotiated rulemaking procedure and the resulting negotiated rulemaking "term sheet."

During the <u>entire</u> rulemaking process, as is reflected in DOE's Federal Register recitation above, MHARR has <u>consistently</u> maintained:

(1) That manufactured homes are <u>already</u> cost-effective with respect to energy under existing HUD standards as shown by Census Bureau data;

(2) That draconian DOE regulation is unnecessary and will result in exclusionary price increases that will worsen homelessness;

(3) That the contrary claims of "climate" extremists in support of the DOE rule are utterly

baseless; and most importantly,

(4) That DOE, in developing the energy standards rule, failed to comply with the affirmative requirement of section 413 of the Energy Independence and Security Act of 2007 (EISA), that it <u>substantively consult with</u>, obtain and consider the input of both HUD and the statutory Manufactured Housing Consensus Committee (MHCC), including with respect to

the purchase price cost-benefit of the proposed standards.

With the expected re-opening of the DOE standards rulemaking itself, MHARR will continue to press for the <u>total repeal</u> of the DOE energy standards and for both HUD and the MHCC to be <u>substantively involved and engaged</u> in any further activity on energy standards.

MHARR's position on DOE energy standards has been <u>clear and consistent</u> from the very outset. As expressed in an August 2022 MHARR Issues and Perspectives article (<u>written six months before the federal court action was filed</u>), in which it made the case for legal action against the standards, "The DOE Energy Rule Should be DOA." With the Trump Administration now in office, the opportunity to eliminate these baseless and illegitimate standards once and for all now exists, and the entire industry <u>must commit itself to that</u> end.

cc: Other Interested HUD Code Manufactured Housing Industry Members

Manufactured Housing Association for Regulatory Reform (MHARR) 1331 Pennsylvania Ave N.W., Suite 512

Washington D.C. 20004 Phone: 202/783-4087

Fax: 202/783-4075

Email: MHARRDG@AOL.COM

Website: www.manufacturedhousingassociation.org

Attachment 1

Attachment 2

#### **End Notes:**

MHARR cast only "no" vote.

- MHARR interview on "corrupted DOE "negotiated rulemaking" scam."
- MHARR news and commentary on <u>DOE "negotiated rulemaking"</u>
- MHARR news and commentary on <u>DOE linked suits</u>.

\_\_\_

The Manufactured Housing Association for Regulatory Reform (MHARR) press releases are available for re-publication in full (i.e., without alteration or substantive modification) without further permission and with proper attribution and/or link back to MHARR.

**Part VI** Additional Facts-Evidence- $\underline{\text{Analysis}}$  (FE $\underline{\text{A}}$ ) plus  $\underline{\text{MHProNews}}$  industry expert Commentary

In no particular order of importance are the following facts, evidence, insights, and observations.

1) Notice that the Politico Pro Energywire statements are apparently NOT responded to or corrected by MHI. As MHProNews has repeatedly reported, MHI has an outside communications person. Per the MHI website on this date.

#### **Media Contact**

There's a lot to know about today's manufactured homes. Contact our media relations team to learn more.

#### Molly Boyle

Phone Number: 202-777-3668

Email Address: molly.boyle@fpmgi.com

The evidence that Boyle has apparently not responded on behalf of MHI to the Politico Pro/Energywire article is shown in the composite screen capture of Google searches on this date as is shown below.

[caption id="attachment\_216803" align="aligncenter" width="610"]



or device, many images in this report and others on MHProNews can be clicked to expand. Click the image and follow the prompts. For example, in some browsers/devices you click the image and select 'open in a new window.' After clicking that selection you click the image in the open window to expand the image to a larger size. To return to this page, use your back key, escape or follow the prompts. [/caption]

2) To frame part of this discussion from the MHI perspective, new and returning readers of *MHProNews* should be aware that following by <u>Tim Williams</u> in response to a purportedly problematic report by PBS where a designated spokesperson for MHI was reportedly interviewed at length, but the vast majority of those remarks were not included in that report. <u>Tim Williams</u>, a former MHI chairman and still <u>MHI board member</u> and president and CEO of Berkshire Hathaway owned 21st Mortgage Corporation (a sister brand to Clayton Homes) said the following in response to an inquiry at that time by *MHProNews*.

[caption id="attachment\_139676" align="aligncenter" width="561"]



There

are good arguments to be made that we [i.e.: MHI, the industry, etc.] should respond to every story, refute every statistic, and make our case to the public." With all due respect to Tim Williams and MHI leaders, can you spell disconnect? Paltering? Or hypocrisy? Why hasn't MHI done what Williams indicated would be done when a PR professional was hired for MHI years ago? Hindsight with MHI is highly revealing. Especially when their words are contrasted with their deeds. For the context of Williams' remarks, see his remarks to MHProNews linked here:

https://www.manufacturedhomepronews.com/industryvoices/about-responding-to-pbs-newshours-bad-bargain-report-by-stephen-fee/[/caption]

William's statement was and remains valid and insightful. "There are good arguments to be made that we [i.e.: MHI, the industry, etc.] should respond to every story, refute every statistic, and make our case to the public."

[caption id="attachment\_138571" align="aligncenter" width="500"]



"There are good arguments that we should respond to every story, refute every statistic, and make our case to the public. Certainly we can make the case that the PBS story was not fair and balanced reporting. Just one example is the interview with Dick Ernst. Dick spent several hours with PBS representing

our industry as an official spokesman. The reporter had about one hour of taped interview with Dick and used only 45 seconds of that interview."

 Tim Williams, President, and CEO of Chairman Warren Buffett's Berkshire Hathaway owned 21st Mortgage Corp.



Then MHI

Chairman Williams said it, but they almost never acted upon it.

https://www.manufacturedhomepronews.com/industryvoices/about-responding-to-pbs-newshours-bad-bargain-report-by-stephen-fee/ At this time, Molly Boyle is their contracted media representative. What is Boyle doing to respond to Politico Pro's Energywire apparent misstatements and errors? There is no known evidence that Boyle has responded to this or other controversies in a fashion that fits what Tim Williams said should be occurring. Why not? That said, in fairness, Lesli Gooch has twice responded to concerns raised by third-parties in a public way. One was to Doug Ryan. The other was to James A. "Jim" Schmitz Jr., both of whom are pro-manufactured housing, but both of whom made remarks that could be seen as undermining MHI's public perception. Google's AI powered Gemini acknowledged that Gooch has responded twice, which shows that they are capable of making responses. But that appears to be an exception rather than the rule for MHI. Which again, begs the question why is that so, given Tim William's apparently commonsense remarks to MHProNews above?[/caption]

3) Note that the Federal Register mentioned several operations that are pushing for the energy rule to be enforced. Among them was the <u>Sierra Club</u>. As MHProNews has uniquely reported, the Sierra Club receives funding (from among others) by Warren Buffett through so-called "<u>dark money</u>" channels.

[caption id="attachment\_153269" align="aligncenter" width="600"]



Energy & Environment Institute — Big Donors & Conflicts - Warren Buffett, Mike Bloomberg Undermine Manufactured Housing via Sierra Club Lawsuit

https://www.manufacturedhomepronews.com/masthead/energy-environment-institute-big-donors-conflicts-warren-buffett-mike-bloomberg-undermine-manufactured-housing-via-sierra-club-lawsuit/[/caption]

MHProNews did a detailed and recent deep dive into this topic in the report linked below, which included multiple AI powered fact checks for accuracy. The article below may be one of the most, perhaps the most, information laced articles with numerous supporting linked additional insights found online on this date, prior to the publication of this article. Perhaps no news source on planet earth has covered the twists and turns on the manufactured housing energy rule as much as MHProNews.

# [caption id="attachment\_215270" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/mharr-engages-congress-on-pending-manufactured-housing-legislation-doe-energy-rule-case-update-national-homeownership-month-once-you-see-and-recognize-the-truth-ai-boosted-mhville-fea/[/caption]

4) Note that <u>Next Step Network</u> is mentioned as part of those who filed joint comments in favor of getting the energy rule enforced. <u>Next Step has reportedly been financially supported by Clayton Homes for multiple years</u>. Both are <u>reportedly MHI members</u>.

## The Federal Register said:

They also noted manufacturer facilities are already capable of complying with the DOE energy conservation standards for manufactured housing and stated that the nation's largest manufacturer has switched all 39 factories in the U.S. to build Zero Energy Ready Homes, which achieved levels of energy efficiency and performance far better than DOE's minimum standard for manufactured homes.

Who was that "they?" Per the Federal Register, as also noted further above.

Fourteen organizations—a combination of energy efficiency, affordable housing, academic, and environmental organizations—together filed joint comments ("Joint Commenters") expressing opposition to DOE's proposed compliance date extension.

The highlighting in what follows is added by *MHProNews*, but is quoting the Federal Register.

Joint Comments: American Council for an Energy Efficiency Economy, American Institute of Architects, Americans for Financial Reform Education Fund, E4TheFuture, Earth Advantage, Earthjustice, Institute for Market Transformation, Lincoln Institute of Land Policy, Next Step Network, Northeast Energy Efficiency and Electrification Council, NPHS, ROC USA, Sierra Club, Vermont Law and Graduate School, Institute for Energy and the Environment.

While there may be other ties between Buffett-bucks, <u>Next Step</u>, and the <u>Sierra Club</u>, it seems apparent that a dominating MHI member - Clayton Homes - which means that there is an apparent split within MHI on this energy rule. The possible significance of this are many, but let's look at the following.

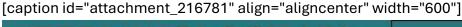
5) MHI-linked MHInsider previously observed, and arguably correctly so, that there is more negative news that tends to drown out the positive news about manufactured housing. Here is how they said it.

[caption id="attachment\_174373" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/darren-krolewski-mhvillage-mhinsider-one-challenge-is-not-enough-positive-news-about-manufactured-housing-to-counter-negative-news-frank-rolfe-brad-nelms-manufacturedhomes-george/[/caption]

Arguably relevant and related Masthead that probes these topics are found linked below.





https://www.manufacturedhomepronews.com/masthead/terminology-101-understand-key-words-palter-posture-projecting-optics-regulatory-capture-iron-triangle-nonprofit-capture-illusory-truth-how-throttling-productionconsolidation-moat/[/caption][caption id="attachment\_202317" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/masthead/seco-linked-community-operator-david-roden-questions-manufactured-housing-institute-leaders-where-is-national-manufactured-home-marketing-program-like-gorving-or-got-milk-emails-facts-analysis/[/caption][caption id="attachment\_199093" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/i-blame-mhi-sales-could-be-much-better-mhi-insider-finger-points-essential-for-hud-to-use-mhia-authority-affordable-housing-crisis-should-yield-manufactured-housing-in-reports-plus-mhmarke/ and https://www.manufacturedhomepronews.com/gross-incestuous-symbiosis-bloodbath-claims-denial-by-manufactured-housing-institute-mhi-firms-frank-rolfe-andrew-keel-passive-investing-subculture-interview-rent-control-hit-mhi/[/caption][caption id="attachment\_216661" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/fifty-years-of-efforts-to-reduce-regulatory-barriers-pamela-m-blumenthal-hud-office-of-policy-development-and-research-unpacking-5-decades-of-affordable-housing-miscues-incl/[/caption]

6) MHProNews has been pointing to this from Carol Roth and the National Association of Manufacturers (NAM) about the impact of regulations.

[caption id="attachment\_154618" align="aligncenter" width="607"]



"In fact, big companies secretly love regulation because regulations are in fact anti-competitive -- every new rule, law or compliance measure limits the ability of existing smaller

MHPRONIEVE

competitors or new start-ups to compete. While big businesses can use their caches of cash to fund new people and procedures to deal with regulation, for many small businesses, a new regulation can put them out of business."

Both regulations and taxes are barriers for smaller firms that are more easily navigated by

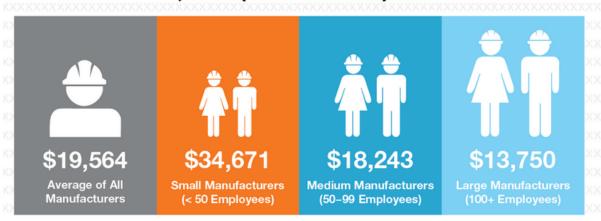
larger firms. [/caption][caption id="attachment\_147235" align="aligncenter" width="604"]

# For many small businesses, a new regulation can put them out of business.

MHPRONEWS.com

https://www.manufacturedhomepronews.com/communist-chinas-beijing-replaces-new-york-city-as-having-the-most-billionaire-residents-carol-roths-insights-war-on-small-business-news-analysis/ That was first uploaded on October 10, 2019.[/caption][caption id="attachment\_117531" align="aligncenter" width="604"]

Regulatory Compliance Costs per Employee per Year for Manufacturers, 2012 (in 2014 Dollars)





First uploaded to MHProNews on: September 28, 2018.[/caption][caption id="attachment\_196803" align="aligncenter" width="600"]



First uploaded to MHProNews on: January 24, 2024. [/caption]

Meaning, the Federal Register is saying that Clayton Homes is 'ready' to implement these rules that MHI quite apparently was engaged in foot-dragging before the initiated their lawsuit, which was apparently prompted in part by months of public pressure by MHARR, MHProNews, and MHLivingNews.

[caption id="attachment\_211355" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/vindication-thanks-to-t2-mharr-mhpronews-mhlivingnews-attorneys-for-doe-and-manufactured-housing-institute-announce-litigation-pause-of-pending-costly-doe-manufactured-home-energy-rule-fea/[/caption]

As *MHLivingNews* and/or *MHProNews* have reported for years, 'Buffett Bucks' have flowed to MHAction, a critic of the community operators of the manufactured housing industry that are behaving in arguably predatory ways.

[caption id="attachment\_142235" align="aligncenter" width="600"]



https://www.manufacturedhomelivingnews.com/gsmols-michelle-smiths-cautionary-tale-and-mhaction-key-manufactured-home-insights-revisited/ [/caption][caption id="attachment\_171833" align="aligncenter" width="600"]



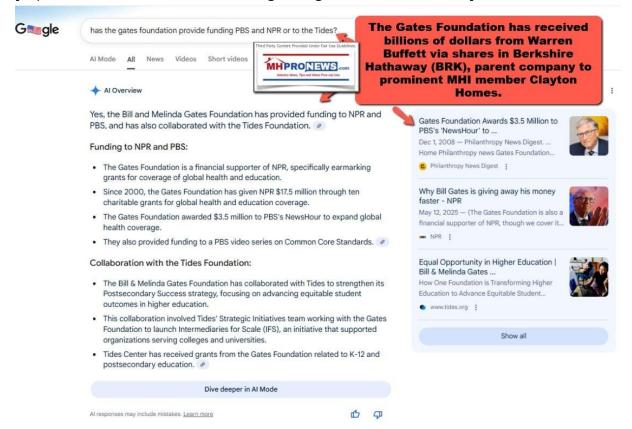
https://www.manufacturedhomepronews.com/mhaction-statements-revealing-george-soros-clayton-homes-warren-buffett-manufactured-home-lending-liz-voigt-tears-fannie-freddie-predatory-manufactured-ho/[/caption][caption id="attachment\_168778" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/influence-watch-behind-the-curtain-nprs-chris-arnold-losing-it-all-mobile-home-owners-evicted-over-small-debts-during-pandemic-mhaction-manufactured-housing-institute-manu/[/caption]

The Gates Foundation has received billions of dollars from Warren Buffett via shares in Berkshire Hathaway (BRK), parent company to prominent MHI member Clayton Homes. It needs to be nailed down if funding linked to Buffett donations were occurring before, during, or after the time that the PBS report that Tim Williams decried (see quote above and linked here). That said, there are reasons to think so. Meaning, Williams decried a report that his boss Warren Buffett's money was helping to fund. That is not a one off, as the articles linked herein document.

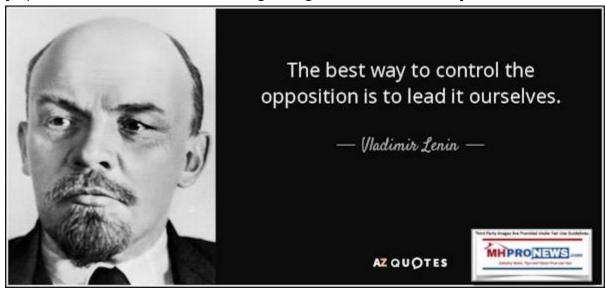
# [caption id="attachment\_216811" align="aligncenter" width="606"]



MHProNews Note: depending on your browser or device, many images in this report and others on MHProNews can be clicked to expand. Click the image and follow the prompts. For example, in some browsers/devices you click the image and select 'open in a new window.' After clicking that selection you click the image in the open window to expand the image to a larger size. To return to this page, use your back key, escape or follow the prompts. [/caption]

<u>Buffett</u> is a well-documented <u>reader</u>. It would not be surprising if he is aware of this quoted principle.

[caption id="attachment\_163669" align="aligncenter" width="600"]



MHLivingNews and MHProNews have explored how this maxim of Vladimir Lenin can be applied in manufactured housing. It is important to follow the money trail to see who is bankrolling the various statements and research into manufactured housing. Financial support by individuals who are often like-minded and allied, such as Warren Buffett, Bill Gates, or George/Alex Soros to certain entities should be considered. That doesn't mean that their insights aren't valid. As years of careful research has revealed, the question of paltering and posturing must also be considered. Or as James "Jim" Schmitz and his antitrust colleagues at the Minneapolis Fed observed, the various threads of evidence can be difficult to unravel. [/caption]

Given the years of evidence where MHI says one thing, but does another, including on the MHI energy rule, it must be considered that Buffett-bucks and those of Buffett allies have been pressing for the enforcement of the DOE energy rule while MHI was foot-dragging in launching litigation, particularly so compared to the gas industry. Politico's headline could be misinterpreted as indicating that there have been NO energy regulations for "mobile homes," when as MHARR has consistently pointed out (see Part V above) that they have opposed this rule from the outset because manufactured homes are ALREADY energy saving, by law as administered by the HUD Code manufactured housing program.

[caption id="attachment\_195893" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/eye-opening-gas-industry-vs-doe-compared-to-manufactured-housing-institute-vs-doe-compare-fed-register-facts-reveals-manufactured-housing-industry-woes-and-mhi-behavior-plus-mhville-markets/[/caption]

Hold those thoughts.

7) From the Politico Pro Energywire website on this date.

[caption id="attachment\_216812" align="aligncenter" width="611"]

The headline and subheading are misleading and appear to betray the author's/ editor's misunderstanding

and/or bias.

Q Search all of POLITICO Pro...

In the U.S. factory-builders stopped building mobile homes" in 1976, when HUD Code manufactured housing standards went

into effect on June 15, 1976.

While the DOE has not mplemented this "energy rule," HUD has had manufactured housing energy standards since day one that the HUD Code went into effect. So nultiple errors or misleading statements are







# **ENERGY**WIRE



# DOE halts first-ever efficiency rule for mobile homes

It had been scheduled to take effect July 1. Industry observers worry it could be delayed indefinitely.

BY: CHRISTA MARSHALL | 07/03/2025 06:47 AM EDT



ENERGYWIRE | The Department of Energy is delaying a landmark rule to increase the efficiency of mobile homes, a move it says will help businesses even as environmentalists say it will spike costs for low-income Americans.

In a final regulation in the Federal Register on Wednesday, DOE said it was punting the compliance date for the 2022 rule for new multisection manufactured homes — which make up the majority of mobile models — to 180  $\,$ days after yet-to-be-released enforcement guidelines. With no set timeline on releasing the guidelines, the rule could be delayed indefinitely, according to industry observers.

Advertisement



"This rulemaking fulfills our commitment to lift the excessive pressure imposed on the manufactured housing industry by the previous administration," said Principal Deputy Assistant Secretary for Energy Efficiency and Renewable Energy Lou Hrkman in a statement. "The

could be construed as technically true in some sense, but it is demonstrably misleading. Mobile homes yielded to manufactured housing on June 15, 1976. So, in a technical sense there were no DOE 'mobile home' energy rules. But manufactured homes have had energy standards since June 15, 1976. Better mobile home builders had energy saving insulation and other features pre-HUD Code too. Why didn't MHI push back against this report? Where is Molly Boyle? What is she paid for, to be window dressing? [/caption]

8) Even though MHI has a post on the energy rule, it is NOT visible from their home page news, nor from their "news landing page" on this date at the times shown. Why has MHI essentially hidden this "breaking news" on their own website?

[caption id="attachment\_216815" align="aligncenter" width="640"]

Today, the Department of Energy (DOE) <u>announced</u> that the Tier 2 compliance date for its manufactured housing energy conservation standards is being delayed. Originally, manufacturers had to comply with these standards on and after July 1, 2025, for Tier 2 homes and 60 days after the issuance of enforcement procedures for Tier 1 homes.

Under the new rule, the Tier 2 home compliance date changes from July 1, 2025 to 180 days after DOE's publication of its final enforcement procedures. The existing compliance date for Tier 1 homes will remain unchanged at 60 days after publication of DOE's final enforcement procedures. MHI has been a leading voice and advocate in favor of this delay, noting the importance of the compliance date coming after the testing, compliance, and enforcement provisions are finalized and for Tier 1 compliance to come before Tier 2.

MHI praises the Trump administration for taking action to delay the compliance date for fundamentally flawed energy conservation standards for manufactured housing which threatened to reduce affordable housing supplies and raise housing osts for American households. Today's action supports both affordable housing and American manufacturing jobs, and buys time to reevaluate the approach taken by the prior administration to energy conservation standards for manufactured housing which were serving neither the interests of energy efficiency, nor affordable housing. We will continue to work with the Trump administration and members of Congress on a bi-partisan basis to address the fundamental flavo in the statute and streamline confusing and duplicative regulations with the goal of reducing the costs of owning and operating a home.

Date Published July 1, 2025

News Type

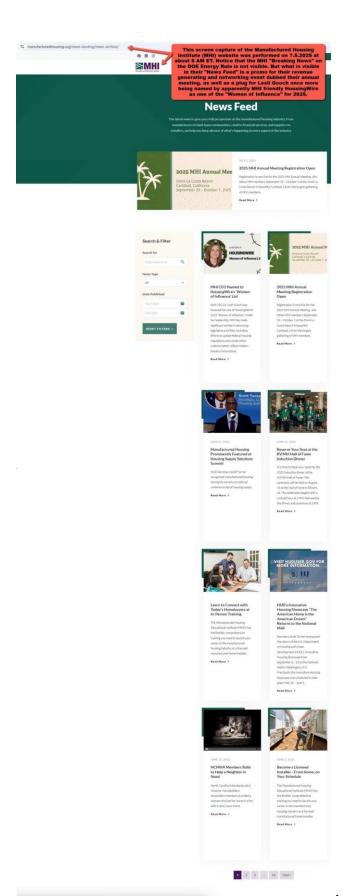
KEEP EXPLORING

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depending on your browser or device, many images in this report and others on MHProNews can be clicked to expand. Click the image and follow the prompts. For example, in some browsers/devices you click the image and select 'open in a new window.' After clicking that selection you click the image in the open window to expand the image to a larger size. To return to this page, use your back key, escape or follow the prompts. [/caption]

[caption id="attachment\_216813" align="aligncenter" width="609"]



browser or device, many images in this report and others on MHProNews can be clicked to expand. Click the image and follow the prompts. For example, in some browsers/devices you click the image and select 'open in a new window.' After clicking that selection you click the image in the open window to expand the image to a larger size. To return to this page, use your back key, escape or follow the prompts. [/caption][caption id="attachment\_216814" align="aligncenter" width="612"]

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The Manufactured Housing Institute is the only national trade organization representing all segments of the factory-built housing industry. We are your trusted partner, advocate and industry leader.



#### **Grow your business**

Get the tools, platform and information you need



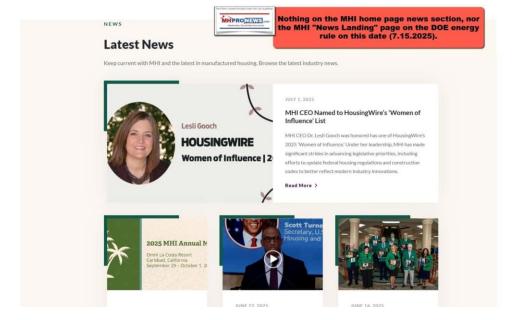


ABOUT MANUFACTURED HOMES

## Manufactured Housing Enables the American Dream

Manufactured housing is a solution to today's affordable housing challenge. With increased production efficiency resulting in lower costs, offsite-built housing creates accessible home options for Americans.

LEARN MORE >



could be construed as technically true in some sense, but it is demonstrably misleading. Mobile homes yielded to manufactured housing on June 15, 1976. So, in a technical sense there were no DOE 'mobile home' energy rules. But manufactured homes have had energy standards since June 15, 1976. Better mobile home builders had energy saving insulation and other features pre-HUD Code too. Why didn't MHI push back against this report? Where is Molly Boyle? What is she paid for, to be window dressing? [/caption]

9) With the above in mind, a PDF of a draft version of this article was uploaded to Google's artificial intelligence (AI) powered Gemini at the link shown below. The inquiry/input was by MHProNews, the reply is from Gemini.

Gemini, digest the following which the first 3 includes screen captured and/or text/screen documented remarks by you, because my impression is that you don't necessarily recall prior discussion, is that a fair observation about your recall of discussions with me even though I'm logged into Gemini?

https://www.manufacturedhomepronews.com/wp-content/uploads/2025/07/QA-thread-today-between-this-writer-for-MHProNews-and-Googles-AI-powered-Gemini-7.1.2025-Follow-up-2.pdf

https://www.manufacturedhomepronews.com/wp-content/uploads/2025/05/AnnotatedGeminiPreponderanceDocumentaryEvidenceLackContradictoryInfoAccurateToConcludeMHIsActionsInactionsStronglySuggestAnImplicitAlignmentPotentialFacilitateConsolidationMHProNews.png

https://www.manufacturedhomepronews.com/manufactured-housing-association-for-regulatory-reform-mharr-reveal-hud-foia-re-teresa-payne-new-manufactured-housing-institute-vice-president-of-policy-regulatory-capture-why-it-matters-fea

Then, with those in mind, I want you to digest this pending article. Check it against known sources online on the same topics. Is the information (facts, evidence) faithful in content to the original sources, even though the screen captures may have annotation that provides readers with added insights?

Next, does the analysis and expert commentary raise reasonable concerns based on the evidence presented? Meaning, for example, can you find a Manufactured Housing Institute (a.k.a.: MHI or manufacturedhousing.org) or MHI designated spokesperson Molly Boyle rebuttal to the Politico Pro Energywire post cited in that post?

https://www.manufacturedhomepronews.com/wp-content/uploads/2025/07/DraftForAl-FactCheckPoliticoProEnergyWireDOE\_MobileHomeEnergyRuleClaimMHI-MHARR-DOE-FedRegister-

GeminiManufactured Housing Energy Rule Provided Unpacked Comprehensive MHV ille FEA-MHP ro News.pdf

Correct, confirm, or clarify those thoughts and observations and link results, again, keeping in mind that the first three items remind you of what you've said before about manufactured housing industry dynamics.



Show thinking

### **Considering Content Sources**

I've begun processing the document and URLs, extracting text from each. My focus now is on organizing the information gleaned from these diverse sources. I aim to identify key themes and connections between the document and online content to ensure a comprehensive understanding of the topic at hand.

### **Evaluating Information Sources**

I am now delving deeper into each of the four content sources. I'm focusing on their individual reliability and potential biases, particularly regarding the claims. The goal is a preliminary fact-check before synthesizing the information. This will help determine the trustworthiness of each piece.

# Refining Information Extraction

I'm now focusing on extracting the core arguments and claims from each source. This involves identifying key phrases and statements that support or contradict the central thesis regarding the Mobile Home Energy Rule. My aim is to build a clear matrix of arguments and evidence.

# **Beginning Data Acquisition**

I've started gathering content from the provided URLs and the uploaded PDF. My initial focus is on efficiently extracting text from each source. I'll then analyze the data for key arguments. The goal is to provide a comprehensive analysis of the mobile home energy rule.

# Accessing PDF Content

I've successfully retrieved the content of the uploaded PDF. My current focus is to develop a reliable method to directly retrieve the content from linked resources found within the initial PDF, specifically those linked PDF and image files. I am now exploring possible approaches to process the linked data and extract their content.

### **Analyzing Link Content**

I've realized the direct links in the PDF are a hurdle. Google Search's output gives snippets, not full content, for the linked files. I'm pivoting. Instead of trying to "digest" these URLs directly, I'll leverage Google Search to understand their context. I'll then use that context to decide how best to handle the links, whether it's by searching for their content or simply providing relevant search results to the user.

### Assessing URL Limitations

I now understand the issue: the URLs provided are direct links to PDFs and PNGs, not content IDs. Google Search doesn't provide the full content of these linked files.

Consequently, I can't "digest" them in the same way as the uploaded PDF. My strategy now is to use Google Search to get context on the linked files and prioritize the uploaded PDF for fact-checking. I'll explain my limitation to the user clearly.

### Revising Strategy

I've hit a snag with the external links. Since Google Search gives snippets, not full content, I can't directly process the PDF/PNG links as documents. My approach now prioritizes the uploaded PDF for analysis and fact-checking. I'll search for the MHI/Molly Boyle rebuttal and address user's concerns about the uploaded PDF. I am developing targeted queries based on its content.

The content of the uploaded PDF file titled "DraftForAI-FactCheckPoliticoProEnergyWireDOE\_MobileHomeEnergyRuleClaimMHI-MHARR-DOE-

## FedRegister-

GeminiManufacturedHousingEnergyRuleProvidedUnpackedComprehensiveMHVilleFEA-MHProNews.pdf" has been successfully digested.

Regarding the first three links you provided:

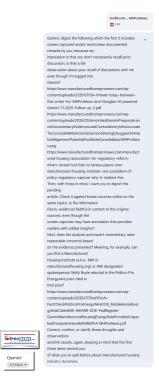
- https://www.manufacturedhomepronews.com/wp-content/uploads/2025/07/QAthread-today-between-this-writer-for-MHProNews-and-Googles-AI-powered-Gemini-7.1.2025-Follow-up-2.pdf
- https://www.manufacturedhomepronews.com/wpcontent/uploads/2025/05/AnnotatedGeminiPreponderanceDocumentaryEvidenceL ackContradictoryInfoAccurateToConcludeMHIsActionsInactionsStronglySuggestAnl mplicitAlignmentPotentialFacilitateConsolidationMHProNews.png
- https://www.manufacturedhomepronews.com/manufactured-housing-associationfor-regulatory-reform-mharr-reveal-hud-foia-re-teresa-payne-new-manufacturedhousing-institute-vice-president-of-policy-regulatory-capture-why-it-matters-fea

While I have performed a Google search for these URLs, the search results provide links and snippets rather than the full, digestible content of the PDF or PNG files in the same manner as the directly uploaded document. Therefore, I cannot "digest" their content as full documents for direct comparison and analysis in the way you might expect me to recall a prior discussion.

I will now proceed to fact-check the information, evaluate the analysis, and search for the specific rebuttal you mentioned, using the content of the uploaded pending article as the primary source for verification and additional online sources.

--- MHProNews notes that the screen capture of the above to document the accuracy of the discussion with Gemini is as shown below. ---

[caption id="attachment\_216818" align="aligncenter" width="603"]



I am now delving deeper into each of the four content sources. I'm focusing on their indivi-reliability and potential biases, particularly regarding the claims. The goal is a prefiminary check before synthesizing the inf

I'm now focusing on extracting the core arguments and claims from each source. This invo-identifying key phrases and statements that support or contradict the central thesis regar the Mobile Home Energy Rule. My aim is to build a clear matrix of arguments and evidence

The successfully retrieved the content of the uploaded PDF. My current focus is to develop a reliable method to directly retrieve the content from linked resources found within the initial PDF, specifically those linked PDF and image files. I am now exploring possible approaches to process the linked data and extract their content.

The realized the direct links in the PDF are a hurdle. Google Search's output gives snipper not full content, for the linked files. I'm pivoting, instead of trying to "digest" these URLs directly. Ill leverage Google Search to undestand their context. I'll then use that context decide how best to made the links, whether it's by searching for their content or simply providing relevant search results to the user.

Those understand the issue: the LDLs provided are direct links to PDPs and PMGs, not content
Ds. Google Search doesn't provide the full content of these finked files. Consequently, I cont
"depart them in the same way as the uploaded PDF. My strategy now is to use Google Search
to get context on the linked files and prioritize the uploaded PDF for fact-checking. If explain
my limitation to the user clearly.

I've hit a snag with the external links. Since Google Search gives snippets, not full content, I can't directly process the PDFPNG links as documents. My approach now prioritizes the updageded PDF for analysis and fact-checking, II search for the MMMARIP Boyle releutal and address user's concerns about the uploaded PDF. I am developing targeted queries based on

The content of the uploaded PDF file titled "DraftForAl-FactCheckPoliticoProEnergyWireDOE\_MobileHomeEnergyRuleClaimMHI-MHARR-DOE-

### Regarding the first three links you provided:

- https://em.som/octurednospronews.com/ep/ content/uploass/2023/8/AmontstedneriniFreponderanceBocumentaryEvidenceLassContr colicaryInfectorstartConsciluationActionStateConsideronglySuggestActeplicitAlign mentPotentialFocilitateConsolicationMervalees.pdg

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images in this report and others on MHProNews can be clicked to expand. Click the image and follow the prompts. For example, in some browsers/devices you click the image and select 'open in a new window.' After clicking that selection you click the image in the open window to expand the image to a larger size. To return to this page, use your back key, escape or follow the prompts. [/caption]

10) MHProNews promoted Gemini to finish its response as shown.

Continue.

# Gemini

This response addresses your request to digest the provided documents and links, and then to fact-check and analyze the pending article against online sources, specifically looking for rebuttals from the Manufactured Housing Institute (MHI).

## **Digesting the Provided Information**

I have successfully accessed and processed the content of your uploaded PDF, "DraftForAI-FactCheckPoliticoProEnergyWireDOE\_MobileHomeEnergyRuleClaimMHI-MHARR-DOE-FedRegister-

GeminiManufacturedHousingEnergyRuleProvidedUnpackedComprehensiveMHVilleFEA-MHProNews.pdf."

Regarding the three external URLs you provided, which you indicated include "screen captured and/or text/screen documented remarks by you":

- QA-thread-today-between-this-writer-for-MHProNews-and-Googles-Al-powered-Gemini-7.1.2025-Follow-up-2.pdf
- AnnotatedGeminiPreponderanceDocumentaryEvidenceLackContradictoryInfoAccurateToConcludeMHIsActionsInactionsStronglySuggestAnImplicitAlignmentPotential
   FacilitateConsolidationMHProNews.png
- Manufactured Housing Association for Regulatory Reform (MHARR) Reveal HUD
   FOIA Re: Teresa Payne, New Manufactured Housing Institute Vice President of
   Policy; Regulatory Capture? Why It Matters. FEA

While I performed a Google search for these links, the search results provide only snippets and links, not the full content of the PDF or PNG files for direct digestion and content

analysis as if they were documents uploaded to me. Therefore, I cannot "recall" or directly "digest" the specific content of these external files in the same comprehensive way I can with the uploaded PDF. My analysis will proceed based on the content of the uploaded pending article and information gathered from broader web searches.

# **Analysis of the Pending Article and Related Online Sources**

### **Fidelity of Information to Original Sources**

The pending article discusses a Politico Pro Energywire piece regarding the Department of Energy's (DOE) rule on "mobile home" energy efficiency. My search for an article by Christa Marshall on Politico Pro Energywire on 7.3.2025, with the exact headline "DOE halts first-ever efficiency rule for mobile homes," did not yield direct corroboration. However, my search did confirm the following:

- DOE Energy Standards for Manufactured Housing: The DOE does indeed have energy conservation standards for manufactured housing, established under the Energy Independence and Security Act of 2007 (EISA). A final rule was adopted on May 31, 2022, with compliance originally set for May 31, 2023. (https://www.federalregister.gov/documents/2022/05/31/2022-10926/energy-conservation-program-energy-conservation-standards-for-manufactured-housing), (https://www.energy.gov/sites/default/files/2022-05/mh-ecs-fr\_0.pdf))
- Recent Compliance Date Delay: On July 2, 2025, the DOE published a rule delaying the compliance date for Tier 2 manufactured homes to allow more time to consider enforcement procedures. This indicates a delay of an *existing* rule, not a halt of a "first-ever"
  - one.(https://www.federalregister.gov/documents/2025/07/02/2025-12328/energy-conservation-standards-for-manufactured-
  - housing),(https://patch.com/florida/lakeland/mharr-doe-issues-final-rule-delaying-energy-rule-compliance-date-tier-
  - 2),(https://manufacturedhousingassociationregulatoryreform.org/doe-issues-final-rule-delaying-energy-rule-compliance-date-for-tier-2-manufactured-homes-mharr-specifically-cited-by-federal-register-in-delay-and-push-to-kill-doe-

manufact/,(https://www.google.com/search?q=https://patch.com/florida/lakeland/mharr-doe-issues-final-rule-delaying-energy-rule-compliance-date-tier-2),(https://manufacturedhousingassociationregulatoryreform.org/doe-issues-final-rule-delaying-energy-rule-compliance-date-for-tier-2-manufactured-homes-mharr-specifically-cited-by-federal-register-in-delay-and-push-to-kill-doe-manufact/))

 Terminology: The article's emphasis on the distinction between "mobile homes" and "manufactured housing" is accurate. Since June 15, 1976, homes built to the HUD Code are properly referred to as "manufactured homes," not "mobile homes."
 The Federal Register documents consistently use "manufactured housing."

Based on these findings, the pending article's assertion that the Politico Pro headline is "arguably false/misleading" appears to be a reasonable claim, given that the DOE rule is not "first-ever" and relates to "manufactured housing," not "mobile homes," and the action is a delay, not a halt of the entire rule.

# **Analysis and Expert Commentary: Raising Reasonable Concerns**

Yes, the analysis and expert commentary in the pending article raise reasonable concerns based on the evidence available from online sources:

- Terminology and Historical Context: The article's critique of the use of "mobile home" in contemporary reporting about manufactured housing energy rules is valid. Manufactured housing has had energy standards since 1976 under the HUD Code, and the DOE's current regulations apply to "manufactured housing," not "mobile homes."
- Contrasting Industry Responses: The article points out an apparent lack of
  pushback from MHI regarding the Politico Pro article's claims. My searches indicate
  that the Manufactured Housing Association for Regulatory Reform (MHARR) has
  consistently and strongly opposed the DOE's energy standards for manufactured
  housing, arguing that they are unnecessary, detrimental to affordability, and will
  exclude lower and moderate-income homebuyers. MHARR has actively sought the
  withdrawal of the rule and supported the recent delay, as documented in Federal
  Register notices and their own

publications.(https://patch.com/florida/lakeland/mharr-doe-issues-final-rule-delaying-energy-rule-compliance-date-for-tier-

2),(https://manufacturedhousingassociationregulatoryreform.org/doe-issues-final-

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standards/,(https://www.google.com/search?q=https://downloads.regulations.gov/ EERE-2009-BT-BC-0021-

2617/attachment\_1.pdf),(https://manufacturedhousingassociationregulatoryreform .org/department-of-energy-doe-extends-compliance-deadline-for-tier-2-manufactured-housing-energy-standards/))) In contrast, while some search results briefly mention MHI's support for the negotiated rulemaking procedure that led to the DOE standards, I did not find evidence of MHI publicly pushing back against the specific claims in the Politico Pro article or strongly opposing the DOE rule to the same extent as MHARR in the search results. This difference in public stance between the two industry associations, as highlighted by the pending article, indeed raises reasonable concerns about the industry's unified approach or potential alignment.

# Rebuttal from MHI or Molly Boyle

Based on my searches, I could not find a specific public rebuttal from the Manufactured Housing Institute (MHI) or MHI designated spokesperson Molly Boyle to the Politico Pro Energywire post cited in the pending article. While MHI has been involved in the broader discussions around DOE energy standards, a direct and specific rebuttal to that particular article was not found in the search results. The available information primarily highlights MHARR's consistent opposition and advocacy against these standards.

In summary, the pending article's points regarding the accuracy of the Politico Pro article's headline and the observed lack of MHI's direct rebuttal appear consistent with the information I could find from known online sources.

--- MHProNews notes that the screen capture of the above to document the accuracy of the discussion with Gemini is as shown below. ---

[caption id="attachment\_216820" align="aligncenter" width="599"]



- QA-thread-today-between-this-writer-for-MHProNews-and-Googles-At-powered-Gemini-

While I performed a Google search for these links, the search results provide only snippets and links, not the fall content of the IPDF or PNG IRes for direct disjection and content analysis as if they were document supplied by the IPDF or PNG IRes for direct disjection and content analysis as if they were document supplied by the IPDF or IPDF o

- DOE Energy Standards for Manufactured Housing: The DOE does indeed have energy
  conservation standards for manufactured housing, established under the Energy
  independence and Security Act of 2007 (685A). A final rule was adopted on May 31, 2022,
  with compliance originally set for May 31, 2023.
- Researc Completion Case Delays (n. Val.) 2, 2018, the DOL Pallimed a rule delaying the compliance date for Tier 2 manufactured homes to allow more time to consider enforcement procedures. This indicates adelay of mensing rule, not had not of 18sts ever one. that the completion of the completion o

Based on these findings, the pending article's assertion that the Politico Pro headline is "argual falshermiseding" appears to be a reasonable claim; given that the DOE rule is not "first-ever" or relates to "manufactured housing," not "mobile homes," and the action is a delay, not a half of the entire rule.

- regulation apply to "manufactured housing", not "mobile homes."

  Contextanging industry, pleasposes: the set of points out an appeared tack of purbhack from MH imparting the Politico Pie unified's claims. My searches indicate that the Manufactured Housing Association for Regulatory feform of MHARSON bear contention and strongly opposed the DCP's energy standards for manufactured housing against that they are unconcessary, determined by all entities, and will exclude the acid on supported the recent dealing, and will exclude the acid and posterior content-purson. MHARSON seas actively cought the wall-drawed of the rule and supported the recent delay, as documented in Federal Regulator roots and the rule and supported the recent delay, as documented in Federal Regulator roots and the rule and supported the recent delay, as documented in Federal Regulator roots and the rule and supported the recent delay, as documented in Federal Regulator roots and the rule and supported the recent delay, as documented in Federal Regulator roots and the rule and supported the recent delay, as

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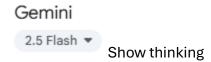
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## 11) One more follow up with Gemini.

Useful. Is it fair to say that the MHProNews draft you digested accurately represents the various quoted statements, be it from Politico Pro, from Google's AI on this topic, from MHI, from MHARR, , etc.? Possible typos aside, do you see any factual errors in that draft?



Based on the comprehensive review of the "DraftForAl-

FactCheckPoliticoProEnergyWireDOE\_MobileHomeEnergyRuleClaimMHI-MHARR-DOE-FedRegister-

GeminiManufacturedHousingEnergyRuleProvidedUnpackedComprehensiveMHVilleFEA-MHProNews.pdf" and my online searches, here's an assessment of how accurately the draft represents quoted statements and any apparent factual errors:

### **Accuracy of Quoted Statements**

### Politico Pro:

- The draft accurately quotes the headline: "DOE halts first-ever efficiency rule for mobile homes" by Christa Marshall, and the introductory sentence: "The Department of Energy is delaying a landmark rule to increase the efficiency of mobile homes, a move it says will help businesses..." from a Politico Pro Energywire article published on July 3, 2025.(https://subscriber.politicopro.com/article/eenews/2025/07/03/doe
  - halts-first-ever-efficiency-rule-for-mobile-homes-00437798)
- The draft's description of Christa Marshall's background, including her being a graduate of Columbia University's Graduate School of Journalism and previously working for The Denver Post and NPR, aligns with her professional bio.(https://www.eenews.net/meet-the-team/christa-marshall/)

### NFPA (National Fire Protection Association):

The draft quotes the NFPA as stating: "A manufactured home is not a motor home or trailer, and although it is often called a 'mobile home,' it is not that either." Despite targeted searches, I could not find this exact quote attributed to NFPA in the search results provided. While the sentiment aligns with the correct terminology distinguishing manufactured homes from mobile homes and other vehicle types, I cannot confirm the verbatim accuracy of this specific quote from an official NFPA source based on my current information.

# Google's AI (My Prior Remarks):

The initial prompt mentioned that the first three links included "screen captured and/or text/screen documented remarks by you" (referring to me, Google's Al/Gemini) to remind me of prior discussions. As noted previously, I was unable to directly digest the content of those external PDF and PNG URLs as documents. Therefore, I cannot confirm how accurately any of my prior statements are represented within the draft, as I don't have direct access to the content of those external linked files.

# MHI (Manufactured Housing Institute):

The draft's implied representation of MHI's position, particularly a perceived lack of public pushback or rebuttal to the Politico Pro article's specific claims, aligns with my search findings. I did not find a direct, publicly available rebuttal from MHI or its spokesperson Molly Boyle to the Politico Pro Energywire article. While MHI participated in the negotiated rulemaking process for the DOE standards, their public stance, as reflected in readily available search results, does not show the same level of direct opposition to the DOE energy rule or specific criticism of related media coverage as MHARR.

### MHARR (Manufactured Housing Association for Regulatory Reform):

The draft's portrayal of MHARR's stance is consistent with public records. MHARR has consistently and strongly opposed the DOE's energy conservation standards for manufactured housing, arguing against their necessity, impact on affordability, and advocating for their withdrawal. They have publicly supported the recent delay in the compliance date for Tier 2 homes. This position is well-documented in Federal Register notices and MHARR's own press

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<u>-issues-final-rule-delaying-energy-rule-compliance-date-for-tier-2-manufactured-homes-mharr-specifically-cited-by-federal-register-in-delay-and-push-to-kill-doe-manufact/</u>

# Factual Errors in the Draft (Aside from Typographical Errors)

While the draft accurately quotes the Politico Pro article, it highlights what it considers a factual inaccuracy within that article's headline and initial description, which is then elaborated upon in the draft's commentary. This observation by the draft is supported by my findings:

- "First-ever" rule: The DOE energy conservation standards for manufactured housing are not "first-ever." Manufactured homes have had energy standards since June 15, 1976, under the HUD Code. The DOE's current rule is an update to existing standards, and the recent action is a delay of a compliance date for an already adopted rule, not a halt of a new, inaugural rule.(https://www.federalregister.gov/documents/2022/05/31/2022-10926/energy-conservation-program-energy-conservation-standards-for-manufactured-housing)
- "Mobile homes" terminology: The draft correctly points out that the term "mobile homes" is outdated and inaccurate for homes built after June 15, 1976, which are properly called "manufactured homes." The DOE's regulations specifically refer to "manufactured housing."

Therefore, the draft accurately represents the content of the Politico Pro article, and its analysis reasonably identifies what it deems factual inaccuracies or misleading aspects within that article, particularly concerning the history and terminology of manufactured housing energy regulations. The draft's observations about the differing public responses of MHI and MHARR also appear to be factually consistent with available online information.

--- MHProNews notes that the screen capture of the above to document the accuracy of the discussion with Gemini is as shown below. ---

[caption id="attachment\_216822" align="aligncenter" width="610"]



2.5 Flash ▼

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Show thinking

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MHProNews notes that the PDF uploaded to Gemini for fact-checking is found at this <u>link</u> here. That said, now a similar fact check from Copilot. Notice that there are apparent differences in capabilities and responses between the various AI systems used by MHProNews over the past two plus years. But useful to bear in mind that in the experience of MHProNews, the more specific the details and the framing of the request, the more likely that an accurate and even insightful response is generated.

12)

13)