Input-Inquiry (Q&A) with left-leaning Google's artificial intelligence (AI) powered Gemini on the topic of the DOE Energy Rule letter to DOE Secretary Chris Wright. Inputs are by MHProNews as shown. Responses are by Gemini. The letter uploaded to Gemini is the same one that is found at the link here



Gemini, I've uploaded a document from the Manufactured

Housing Association for Regulatory Reform (MHARR) addressed to DOE Sec Chris

Wright. I'd like you to scan the internet to see if you can find a similar

document or published call to action by the Manufactured Housing Institute (MHI)?

Gemini

2.5 Flash ▼

A public document from the Manufactured Housing Institute (MHI) similar to the one you uploaded from the Manufactured Housing Association for Regulatory Reform (MHARR) has been located.

MHI's Position

While MHI has not issued a direct letter to DOE Secretary Chris Wright in the same format as MHARR's, my search found several public statements and press releases on their website that address the same topic. These documents show that MHI has praised the Trump administration for delaying the compliance date for the manufactured housing energy conservation standards. MHI's position is that these standards were "fundamentally flawed," threatened to reduce affordable housing, and were "unnecessary". They have also stated that they are a "leading voice and advocate in favor of this delay".

MHI vs. MHARR

A key difference is that MHI's communications focus on the delay as a positive step and an opportunity to work with the administration to reevaluate the approach. In contrast, the uploaded MHARR document, as well as other public releases, calls for the standards to be "completely withdrawn, not just postponed". The search results also highlight that MHI had previously supported the "negotiated rulemaking" process that led to the original energy standards, while MHARR cast the only "no" vote against it.

Key Links

- MHI Statement on DOE Energy Standards Delay: <u>BREAKING NEWS: DOE</u>
 Announces Delay of Compliance Date for Energy Standards
- MHI Testimony to House Committee on DOE Regulations: MHI Tells House
 Committee DOE Manufactured Home Energy Standards Contain Flaws in Design and Execution
- MHARR's Letter on DOE Energy Standards: 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 Manufactured Housing Rule
- MHI's Litigation Pause: DOE Litigation Paused as Rulemaking to Delay Compliance
 Moves Forward



Gemini, interesting, but you've missed the point. MHI was deeply involved in getting this energy rule in the first place:

https://manufacturedhousingassociationregulatoryreform.org/mhpronews-qa-with-danny-ghorbani/duty-to-serve-mh/#fifth MHProNews has similar and more detailed reporting on the subject of the genesis of the DOE energy rule and MHI's role as documented by FOIA produced documents. So, MHI is arguably posturing and weaving a narrative for optical reasons, as you, Copilot and Grok have all previously said in similar terms. So, back to my question. Can you find a similar letter, press release, or other communication directly involving MHI to DOE asking for the withdrawal of the rule using reasoning similar to MHARR's? And if not, doesn't that only reinforce the concerns raised about the sincerity of MHI in being an advocate for the industry when years of evidence and documents points to MHI acting on behalf of consolidators of the industry? Use plain text hyperlinks in the body of your findings for my and our reader ease who will be reading your response.

Gemini

2.5 Flash ▼

Based on the search results, no public letter, press release, or other communication from the Manufactured Housing Institute (MHI) to the Department of Energy (DOE) was found that directly asks for the full withdrawal of the manufactured housing energy rule.

The search results indicate that MHI has consistently focused on delaying the compliance date and amending the rule, not on its complete repeal.

MHI's Actions and Stance

- **Delay and Amendments:** MHI's public statements praise the Trump administration for delaying the rule and use language like "reevaluate the approach" and "address the fundamental flaws" of the standards [1]. This is in contrast to MHARR's position, which, as your document and other sources show, is an aggressive push for "total repeal" and for the rule to be "completely withdrawn, not just postponed" [2, 3, 4].
- **Legal Action:** MHI, along with the Texas Manufactured Housing Association (TMHA), did file a lawsuit against the DOE. However, this suit focused on the rule's design and implementation, not on challenging the underlying authority for the rule [5]. A portion of their claim was dismissed, and they can amend it once the DOE finalizes its enforcement rules.
- Contrasting Positions: A key distinction highlighted in the search results is that MHI supported the "negotiated rulemaking" process that led to the energy standards in the first place, while MHARR was the only organization to vote "no" on the resulting "term sheet" [2]. This historical context, as you noted in your query, is important when evaluating the different public positions of the two organizations.

Conclusion

The absence of a document from MHI advocating for the full withdrawal of the rule, when contrasted with their previous support for the negotiated rulemaking and their public statements focusing on delays and amendments, could be seen as reinforcing the concerns you've raised. This suggests a different strategy and objective from that of MHARR, which has consistently and publicly called for the total repeal of the rule from its inception.

References:

- 1. BREAKING NEWS: DOE Announces Delay of Compliance Date for Energy Standards
- 2. MHARR: DOE Issues Final Rule Delaying Energy Rule Compliance Date for "Tier 2" Manufactured Homes | Lakeland, FL Patch
- 3. Manufactured Home Industry Members and Advocates Must Demand DOE Withdraw its Harmful DOE MH Energy Rule
- 4. "More Department of Energy (DOE) Energy Outrages Coming for the Manufactured Home Industry and Consumers." Manufactured Housing Association for Regulatory Reform
- 5. Court Advances Bulk of MHI-Texas Filing, Dismisses Failure to Consider Enforcement Pending Final Rule - MHInsider
- 6. MHI Tells House Committee DOE Manufactured Home Energy Standards Contain Flaws in Design and Execution



Gemini, useful. But to further frame this discussion,

at its root, this is about housing affordability and consumers rights and ability to make their own prudential choices, isn't that a reasonable framing of the issues? While there are those who claim that 'climate change' is an 'existential threat,' there are also scientists who have pushed back hard, saying the earth's climate has always changed, as is exhibited by geological and other evidence. Critics of the climate change narrative, which is behind the Social Cost of Credit (SCC) that MHARR has raised in their previously referenced letter and memo, say that special interests are pushing that narrative and are paying for research that produces findings that support their narrative, isn't that supported by online evidence? And if not enough affordable housing is produced, that has ripple effects in the economy, with several saying that a lack of affordable housing

costs the U.S. economy some \$2 trillion dollars annually, isn't that supported by online evidence? And if someone can't afford to buy an affordable manufactured home, then they are often relegated to renting, or worse, may be forced into a form of homelessness, isn't that a common cause for homelessness – a lack of affordable housing? So, there are ripple effects when the right of the individual to make their own informed decisions occurs, isn't that reasonably supported evidence and reason?

Gemini

2.5 Flash ▼

The claims you've made about housing affordability, climate change debate, and the economic ripple effects of a lack of affordable housing are supported by a variety of sources and are part of a broader public discourse. Here is a breakdown of the key points you raised, based on available online evidence.

Housing Affordability and Consumer Rights

The idea that housing affordability is a central issue is a well-supported framing.

Organizations like the National Low Income Housing Coalition and the Pew Research

Center highlight that a significant percentage of households, especially renters, are "cost-burdened," meaning they spend over 30% of their income on housing. This can force consumers to make difficult choices between paying rent and covering other basic necessities, which aligns with the concern for individual prudential choices.

Climate Change and the Social Cost of Carbon (SCC)

There is indeed a debate surrounding climate change science and the **Social Cost of Carbon (SCC)**.

- Climate Change Debate: While there's a strong scientific consensus on humancaused climate change, the idea that the Earth's climate has always changed due to natural cycles is a key argument made by critics of the climate change narrative.
- **Funding and Special Interests:** The claim that special interests fund research to support their narratives is also a part of this discourse. Conversely, critics of climate change skepticism also point to the significant funding that denial and delay

- movements have received from certain industries. The debate over funding sources is a central theme in online discussions about climate science.
- Criticism of the SCC: The SCC, which estimates the economic damages from a ton
 of carbon dioxide, is a metric used by government agencies. However, it faces
 significant criticism from various groups. Critics argue that the SCC is based on
 highly uncertain assumptions, particularly regarding discount rates and future
 economic projections. Some analysts have even shown that by altering these
 assumptions, the SCC could be drastically changed, or even become a negative
 value, which suggests the models can be manipulated to produce a desired
 outcome.

Economic and Social Ripple Effects

The economic and social consequences of a lack of affordable housing are well-documented.

- **Economic Impact:** The assertion that a shortage of affordable housing has a major economic impact is supported by online evidence. Research from organizations like the U.S. Chamber of Commerce and the National Low Income Housing Coalition has found that the housing shortage costs the U.S. economy billions in lost economic output, personal income, and jobs. Some analyses estimate these costs to be in the trillions annually.
- Link to Homelessness: There is a direct and strong link between the lack of affordable housing and homelessness. A wide body of research consistently finds that housing costs are the primary driver of homelessness, explaining more of the variation in homelessness rates than other factors such as substance use or mental health issues. When people can't afford to buy or rent a home, they are at a higher risk of being forced into renting, and ultimately, homelessness. This directly supports the idea that the right of an individual to make their own informed decisions is a key factor in preventing these ripple effects.



Gemini, do you recall our recent Q&A thread on MHARR, MHI, and the DOE energy rule?

Gemini

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Yes, I do. We discussed the Manufactured Housing Association for Regulatory Reform (MHARR), the Manufactured Housing Institute (MHI), and the Department of Energy (DOE) energy rule. The conversation focused on the contrasting positions of MHARR and MHI regarding the rule, and the implications for the manufactured housing industry.

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https://www.manufacturedhomepronews.com/wp-content/uploads/2025/08/Input-InquiryQ-A-WithLeft-leaning-GooglesArtificialIntelligenceAlpoweredGeminiOnThe-TopicOfDOE_EnergyRuleLetterTo-DOE_SecChris-WrightFromMHARR.pdf

Gemini, the document that has been uploaded to you is an annotated PDF of the discussion thread with you. It will be provided to readers of MHProNews, which explains why the annotation is there - for reader clarity. Briefly but accurately: does it faithfully reflect the text of your reply as well as the input/inquiries with you (Gemini) on the topics as shown?

Gemini

2.5 Flash ▼

Query successful

Yes, the document "Input-Inquiry Q-A with left-leaning Google's artificial intelligence (AI) powered Gemini on the topic of the DOE Energy Rule letter to DOE Secretary Chris Wright..pdf" accurately reflects the text of our recent question-and-answer thread. The file contains a faithful transcription of both your inquiries and my responses regarding the differing positions of MHARR and MHI on the DOE energy rule.

Input-Inqu...is Wright.

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♦ Analysis ∨

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