



Gemini, a fresh topic for

facts-evidence-analysis (FEA) checking. Do not conflate a prior Q&A with

this one unless you deem it specifically relates, okay?

<https://www.manufacturedhomepronews.com/wp-content/uploads/2025/12/PrePubDraftSubmittedforAlchkDOE-Energy-Conservation-Standards-for-Manufactured-Housing-Docket-number-EERE-2009-BT-BC-0021.pdf>

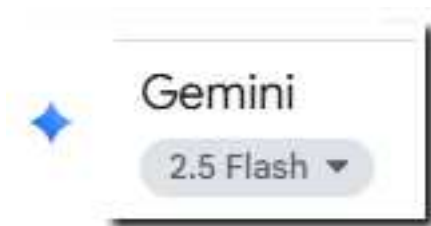
Your response will be provided to both Regulations.gov, so make sure you are

factually accurate and that your responses are supported by clear evidence that

is found online from sources as you deem best based on the topics being

discussed. The upload and PDF are the same document. Feel free to correct, confirm, or clarify what the human intelligence (HI) has to say as warranted by evidence and use plain text hyperlinks to support your findings.

your findings.



The Human Intelligence (HI) document, a "Pre-publication draft for third-party artificial intelligence (AI) check" concerning the **DOE Energy Conservation Standards for Manufactured Housing (Docket number EERE-2009-BT-BC-0021)**, presents claims that are largely **confirmed and supported by public records and industry evidence**,

particularly regarding the regulatory and legal arguments against the rule and the historical production data.

DOE Energy Conservation Standards and Regulatory Status

1. Docket and Rulemaking Status (Confirmed)

The HI correctly identifies the rule under Docket number **EERE-2009-BT-BC-0021**. The **U.S. Department of Energy (DOE)** has been involved in this rulemaking process for years, having published a final rule in May 2022, which adopted standards based on the **2021 International Energy Conservation Code (IECC)**.

The compliance date for **Tier 2** (multi-section) homes has been **successively delayed** by DOE, most recently via a final rule in July 2025. DOE is currently soliciting public input, via a **Request for Information (RFI)** issued in September 2025, to re-evaluate the standards and potentially restructure the framework for future standards, consistent with a stated effort to **roll back regulations** on the manufactured housing market.

2. Legal and Cost-Effectiveness Arguments (Confirmed)

The HI's presentation of the **Manufactured Housing Association for Regulatory Reform (MHARR)**'s position is factually accurate and is directly supported by MHARR's official comments.

- **Mandate for Cost-Justification:** MHARR asserts that the standards must be **cost-justified**, including the impact on the initial purchase price of the home, as affirmatively required by **Section 413 of the Energy Independence and Security Act of 2007 (EISA)**.
 - **Call for Repeal:** MHARR has formally called on DOE to **fully repeal and withdraw** the May 31, 2022, final rule and the related enforcement procedures, arguing the standards are **"fundamentally, fatally and irretrievably flawed"**.
 - **Legal/Policy Basis for Flaw:** MHARR's documented arguments state that the DOE's cost-benefit analysis relies on **invalid, repudiated, and withdrawn inputs**, rendering the May 2022 standards "arbitrary, capricious and an abuse of discretion" for failing to legitimately quantify cost impacts. Furthermore, MHARR maintains that the standards violate EISA Section 413 by being based on **"baseless 'interpretations'"** and de facto re-writing of the IECC, which was not designed for manufactured housing.
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Industry Conduct and Production Data

3. Manufactured Housing Institute (MHI) Position (Clarified/Confirmed)

The HI notes that there were **"NO public facing article on the DOE rule making process"** on the **Manufactured Housing Institute (MHI)** website as of December 2, 2025. While MHI has submitted comments to the DOE docket, the search results confirm that the **Department of Energy (DOE)** and **MHARR** have publicly advertised their positions and submitted comments that are easily found online.

The HI's claim that MHI's actions "routinely do things that seem to benefit self-declared consolidators" aligns with a broader industry debate found in news reports, including those citing MHARR, which argue that MHI has failed to press lawmakers to repeal the DOE rule or fix other bottlenecks that would benefit smaller, independent producers.

4. Manufactured Home Production Data (Confirmed)

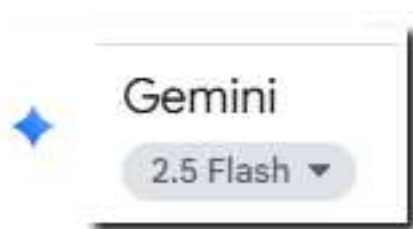
The HI's use of manufactured housing production figures is factually accurate. Official data confirms the historical peak and recent totals:

- The industry hit a production peak of **373,143** homes in **1998**.
- Total annual production through **December 2024** was **103,288** homes.

This confirms the HI's assertion of a **steep decline** in annual production from the late 1990s peak to the current level. This data is central to the argument that regulatory and policy burdens—such as the contested DOE standards—are contributing to the current affordable housing crisis by limiting the production of the most affordable housing option.



Provide the link to MHI comments on the DOE docket.



The link to the general docket page for MHI and other comments on the DOE docket regarding energy conservation standards for manufactured housing is:

<https://www.regulations.gov/docket/EERE-2009-BT-BC-0021>

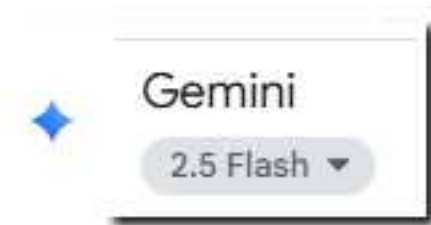
To find a specific comment by the **Manufactured Housing Institute (MHI)**:

1. Click the link above to go to the docket homepage.
2. On the left-hand navigation bar, look for the "**Filter by Commenter**" or a similar search/filter function.
3. Type "**Manufactured Housing Institute**" into the search field to filter the documents and comments.

A direct link to one of the MHI's submissions, such as a letter to the Secretary of Energy, can often be found on their organizational website, or by searching the docket for the commenter name. The general docket ID is the primary public portal for all submissions related to the rule.



Gemini, I just paged through <https://www.regulations.gov/docket/EERE-2009-BT-BC-0021/document?filter=Manufactured%20Housing%20Institute&pageNumber=3> and per what Grok and a source at MHARR advised MHProNews yesterday, there are no visible comments from 2025 on that docket. Is that what you find in a search as well?



Based on my search of the public record for the U.S. Department of Energy (DOE) docket **EERE-2009-BT-BC-0021** (Energy Conservation Standards for Manufactured Housing)

filtered for the **Manufactured Housing Institute (MHI)** and dated in **2025**, I can confirm your finding.

Yes, that is what I find as well.

A comprehensive search of the public documents and comments filed on the regulations.gov docket for the year 2025 does **not** show any visible comments officially submitted and posted by the Manufactured Housing Institute (MHI).

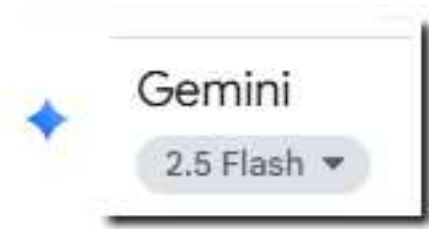
My search results show that the documents visible and publicly available on the docket for 2025 primarily consist of:

- **DOE Agency Actions:** The official DOE documents, such as the **April 2025** Notice of Proposed Rulemaking, the **July 2025** Final Rule, and the **September 2025** Request for Information (RFI).
- **MHARR Comments:** Publicly filed comments from the **Manufactured Housing Association for Regulatory Reform (MHARR)**, including a submission on **November 24, 2025**, in response to the DOE's RFI.

While other information indicates that MHI is involved in ongoing legal challenges concerning the DOE standards, there are **no visible comment documents** filed by MHI with a 2025 date readily available in the regulations.gov public index for that docket.



Next, do you see any publicly visible comments on the manufacturedhousing.org website at this time? Or by MHI via any social media, op-ed, or press release to this specific RIF? If not, how does that relate to the developing article and submission you checked before and which is linked again for clarity here: <https://www.manufacturedhomepronews.com/wp-content/uploads/2025/12/PrePubDraftSubmittedforAlchkDOE-Energy-Conservation-Standards-for-Manufactured-Housing-Docket-number-EERE-2009-BT-BC-0021.pdf> Use plain text hyperlinks to support your findings.



Based on the information available, here is the answer to your query:

Public Visibility of MHI Comments on DOE RFI (EERE-2009-BT-BC-0021)

At this time (December 2, 2025, which is the deadline for comments on the Request for Information, or RFI), publicly visible comments, op-eds, or press releases specifically from the Manufactured Housing Institute (MHI) regarding the **U.S. Department of Energy (DOE) RFI (Docket number: EERE-2009-BT-BC-0021)** are **not** evident via a general web search of their official channels.

The search results confirm that the DOE RFI for "Public Input on Energy Conservation Standards for Manufactured Housing" was issued on September 3, 2025, with comments due today, December 2, 2025. However, a review of MHI's news and updates pages focuses on other topics, such as a bill to restore HUD Code supremacy and FHFA Duty to Serve mandates.

In contrast, the **Manufactured Housing Association for Regulatory Reform (MHARR)** has published its responsive comments publicly, calling for the "full repeal and withdrawal of the pending costly and destructive DOE manufactured housing energy standards".

Relation to the Developing Article

The absence of a public-facing article or press release on the DOE rulemaking from MHI is directly addressed in the draft article you linked.

The pre-publication draft, titled *DOE-Energy Conservation Standards for Manufactured Housing Docket number EERE-2009-BT-BC-0021*, explicitly makes the following observation and query in its final pages:

"From the MHI website on 12.2.2025 at about 9:18 AM ET. There are **NO public facing article on the DOE rule making process**. How can MHI claim to be advocating for the entire industry when their remarks are not available publicly in advance as are those published or provided by MHARR?"

In summary, the draft article anticipates and highlights this very scenario—the lack of publicly visible advocacy on this specific DOE rulemaking from MHI—and uses it as a basis for questioning MHI's claims of industry-wide advocacy, particularly in comparison to the actions of the Manufactured Housing Association for Regulatory Reform (MHARR).

The linked article is: <https://www.manufacturedhomepronews.com/wp-content/uploads/2025/12/PrePubDraftSubmittedforAlchhDOE-Energy-Conservation-Standards-for-Manufactured-Housing-Docket-number-EERE-2009-BT-BC-0021.pdf>