



Manufactured Housing Association for Regulatory Reform

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March 4, 2022

VIA ELECTRONIC SUBMISSION

U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Program
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: Draft Environmental Impact Statement for Proposed Energy
Conservation Standards for Manufactured Housing (DOE/EIS 0550)

Dear Sir or Madam:

The Manufactured Housing Association for Regulatory Reform (MHARR) filled comments in this docket on February 25, 2022 opposing the Draft Environmental Impact Statement (EIS) published by the U.S. Department of Energy (DOE) on January 14, 2022. MHARR also filed comments on October 25, 2021 and November 22, 2021 opposing the proposed manufactured housing energy standards published by DOE on August 26, 2021 and modified on October 26, 2021.

On February 28, 2022, another manufactured housing industry group, the Manufactured Housing Institute (MHI), filed comments in the present docket. Among other things, those comments include and incorporate a document captioned “Appendix I – Industry’s Proposal for Energy Efficiency Standards for Manufactured Housing.” In part, that document states: “MHI and the industry’s goal in developing this alternative manufactured housing energy standard was to provide a concrete example showing how a judicious increase in energy requirements can result in substantially improved energy efficiency and greater affordability.”

We are writing to ensure that the administrative record is abundantly clear that:

- (1) MHI does not represent the entire manufactured housing industry;
- (2) MHARR was not consulted with respect to the aforesaid misnamed “industry” proposal;

(3) MHARR does not support or endorse the aforesaid misnamed “industry” proposal and would not support its adoption or consideration; and

(4) MHARR, as set forth in its previously-filed comments, would not accept or support any proposed manufactured housing “energy conservation” rule that is developed outside of the Manufactured Housing Consensus Committee process prescribed by the Manufactured Housing Improvement Act of 2000.

We ask that this communication be included in the administrative record of the aforesaid proceeding in order to prevent any misrepresentation or misunderstanding regarding alleged “industry” support for the aforesaid MHI “Appendix 1” document.

Sincerely,

Mark Weiss
President & CEO