



NEPA Document Manager, DOE Golden Field Office
15013 Denver West Parkway
Golden, Colorado 80401

RE: Comments for U.S. Department of Energy (DOE) Office of Energy Efficiency and Renewable Energy (EERE) Environmental Impact Statement for Proposed Energy Conservation Standards for Manufactured Housing

Dear NEPA Document Manager:

The National Association of State Energy Officials (NASEO) appreciates the opportunity to submit these comments on the Environmental Impact Statement (EIS) process for the proposed update to the energy conservation standards for manufactured housing. NASEO represents the 56 governor-designated State, Territory and District of Columbia Energy Offices across the nation.

NASEO commends the U.S. Department of Energy's (DOE) effort to update conservation standards for manufactured housing, which have not been updated since 1994. This extended lapse in code updates has led to residents of manufactured homes paying much more in energy and operating costs. The U.S. Energy Information Administration's (EIA) data shows that residents of manufactured homes pay nearly twice the energy costs per square foot as residents of site-built homes.¹

NASEO supports the scope of this update, using the 2021 International Energy Conservation Codes (IECC) as a baseline. Not only do these codes offer cost-effective ways to save energy in homes, but the text of the *Energy Independence and Security Act of 2007* (EISA) makes it clear that using another code as the baseline would be inappropriate, and states "the energy conservation standards established under this section *shall* be based on the most recent version of the IECC."²

EISA does allow conservation standards to differ from the most recent IECC code when there are cost-effectiveness concerns. When examining cost-effectiveness concerns, NASEO encourages DOE to leverage the expertise of

¹ Talbot, Jacob. "Mobilizing Energy Efficiency in the Manufactured Housing Sector." July 2012. American Council for an Energy-Efficient Economy. <<https://www.aceee.org/sites/default/files/publications/researchreports/a124.pdf>>.

² Energy Independence and Security Act of 2007. Page 111. <https://www.govinfo.gov/content/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf>.

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the DOE National Laboratories, which have a history of examining the economic and energy impacts of new codes and standards. Our review indicates that the 2021 IECC is cost-effective and should be the starting point for a new manufactured housing standard. Anything with lower energy efficiency will cost consumers money, hurt low-income Americans, and have negative impacts on meeting environmental justice goals.

Finally, when considering the cost-effectiveness of new conservation standards, the EISA states that cost-effectiveness should be “Based on the impact of the code on the purchase price of manufactured housing and on total life-cycle construction and operating costs.” This makes it clear that energy-savings throughout the lifetime of the home should be considered when developing new codes. In addition, NASEO encourages DOE to incorporate health and climate impacts from energy use and associated air pollution into cost-effectiveness considerations.

Thank you for the opportunity to provide comments on the Environmental Impact Statement for Proposed Energy Conservation Standards for Manufactured Housing. Many residential energy efficiency programs administered by State Energy Offices aim to enhance home performance, which saves residents money on utility bills, conserves energy, and reduces air pollution. Manufactured housing is a key housing option for low- and moderate-income Americans, and efforts should be made to maintain affordability at the point of purchase and throughout the lifetime of the home. Federal pre-emption of building standards for this market and the 27-year gap in code updates has led to increased energy costs for residents and diminished home performance and comfort that most states and municipalities independently deemed unacceptable through their local building codes.

As described in [NASEO’s response to a 2018 DOE Request for Information](#) on the manufactured home standard, technologies across every sector of the economy have advanced dramatically over the nearly three-decade lag since the last code update. We urge a modernization of these codes to benefit the health and finances of residents of manufactured homes, the resilience of the energy system, and the environmental quality of our nation.

Best regards,

A handwritten signature in blue ink, appearing to read 'DTerry', with a long horizontal flourish extending to the right.

David Terry
Executive Director, NASEO