



April 21, 2020

Chair Megan Decker,
Commissioner Letha Tawney,
Commissioner Mark Thompson
Oregon Public Utilities Commission
201 High Street SE#100
Salem, OR 97301

Re: Public Comment on Docket Number UM 1696 Energy Trust of Oregon Manufactured Home Replacement Pilot

Dear Chair Megan Decker, Commissioner Letha Tawney, and Commissioner Mark Thompson,

Craft3 is writing to express strong support for the extension of the Energy Trust of Oregon's Manufactured Home Pilot ("Pilot") program.

Craft3 is a nonprofit 501(c)3 community loan fund that makes investments in Oregon and Washington that strengthen the resilience of businesses, families, and nonprofits, including those without access to traditional financing. Since our founding, we have invested over \$525 million in more than 6,000 people and businesses.

Since 2018, Craft3 has worked with Energy Trust of Oregon on its effort to create a program that facilitates the replacement of aging manufactured homes in Oregon. Because energy incentives are not enough to fully-cover the cost of a replacement for low-income homeowners, despite manufactured homeowners experiencing disproportionately high energy burdens, Energy Trust of Oregon approached Craft3 to develop a complementary accessible loan product.

The outcome of significant stakeholder feedback, the resulting Manufactured Home Replacement Loan offered by Craft3 is more accessible, affordable, and equitable than many of the predatory loan products on the market. The product serves homeowners living in parks and is designed to accommodate lower incomes, tight household budgets, and prior credit issues without causing undue financial burden on the homeowners.

Our experience working in this market thus far tells us that neither the loan nor incentive will be enough on their own to help homeowners afford a manufactured home replacement project. (And even those two sources together are not, generally, enough.) We have also learned that the process takes time. New resources available through the Oregon House Bill 2896 will complement Energy Trust of Oregon and Craft3 support to further reduce project costs and make manufactured home replacement accessible to more Oregon homeowners. All of these resources, including the Pilot, are necessary to achieve affordability.

Manufactured homes are a critical source of affordable housing in Oregon. There are thousands of manufactured homes with high energy burdens, many of which have also have asbestos, indoor air quality issues, or are structurally unsound. Continuation of the Pilot will address these critical energy, health and safety issues, and enable manufactured housing replacement efforts to succeed and scale.

Should you have any questions about our support for extending the Pilot, please do not hesitate to reach out to me for more information at dsideroff@craft3.org or 888-231-2170 ext. 109.

Thank you for your consideration,

Desiree Sideroff, SVP
Consumer Lending Director
Craft3