



St. Vincent de Paul Society of Lane County, Inc.

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To: The Public Utility Commission of Oregon

Docket No. UM 1696, St. Vincent de Paul Society of Lane County, Inc.

Re: Energy Trust of Oregon Cost Effectiveness Exception Requests for Manufactured Homes

Energy Trust of Oregon's manufactured home replacement pilot has had a crucial impact on St. Vincent de Paul of Lane County's (SVdP) ability to finance unit replacements at the Oak Leaf Mobile Home Park, a 22 unit affordable housing project in Northeast Portland. Participation in Energy Trust's pilot program facilitated SVdP's ability to replace aging units with new energy-efficient units. SVdP believes it is extremely worthwhile to extend the pilot in order to expand data gathering and move forward with additional replacements.

SVdP's perspective on the exception request for Energy Trust's pilot program is informed by extensive work in the affordable and manufactured housing fields. SVdP is human service nonprofit that has developed over 1,400 units of affordable housing since 1988, and acquired 8 manufactured home parks in Oregon. SVdP pursues park acquisition and rehabilitation to preserve a significant source of non-subsidized affordable housing in the region. A vital component of rehabilitation work is the replacement of uninhabitable homes constructed prior to 1976. Unit replacements increase housing stability by mitigating utility burdens and health-risks:

- Increased energy-efficiency to reduce energy burdens on residents: Utility savings ease financial burdens, freeing up money for groceries, health care and other necessities.
- New units have positive impacts on overall health: Manufactured homes constructed prior to 1976 often test positive for hazardous substances, namely asbestos. Furthermore, deteriorated conditions often include mold, structural problems, and insufficient weatherization.

Incentives increase capacity of nonprofit affordable housing providers, like St. Vincent de Paul, to decommission aging units and replace them with high-performing, energy-efficient manufactured homes. Without funding to offset costs—including hazardous materials testing, asbestos abatement, demolition, permitting, unit purchase and setup costs— nonprofits face substantial financing obstacles to replacement efforts. Increased replacement capacity is evident in the Oak Leaf Mobile Home Park's participation in the program. Incentive funding is critical to the ability of nonprofit affordable housing providers to make much needed improvements to the housing in the parks they operate.

Respectfully submitted,

By: /Laura Bennett/

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St. Vincent de Paul Society of Lane County