



September 7, 2021

RE: Support for Energy Trust of Oregon Cost Effectiveness Exception requests for Manufactured Homes

Dear Public Utility Commission,

Thank you for the opportunity to provide testimony in favor of Energy Trust of Oregon's cost effectiveness exception requests for Manufactured Homes.

CASA has been developing affordable housing in Oregon for the last 33 years. In 2008, we became a member of ROC USA and started a program to preserve manufactured home parks as resident owned. Manufactured housing is a naturally occurring affordable housing product and in Oregon there are approximately 6,000 manufactured homes. Our program helps residents of manufactured home parks form a cooperative, find the financing to purchase the park and provide ongoing technical assistance to assist them in operating their newly formed cooperative. CASA was also a partner in Manufactured Home replacement pilot with Energy Trust and is actively working with the Energy Trust for the replacement of manufactured homes within our cooperatives.

CASA supports Energy Trust's request for an exemption for the requirement of existing pre-1995 vintage manufactured homes and replacements with new NEEM 1.1 (Energy Star) or better manufactured home replacement. We agree that these exceptions will support a framework that would allow Energy Trust to combine the funding sources necessary to complete projects and replace much need homes.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Peter Hainley".

Peter Hainley
Executive Director