

**From:** [Bill Van Vliet](#)  
**To:** [PUC.PUC.FilingCenter \\* PUC](#)  
**Subject:** PUC Docket 21-267 comments  
**Date:** Tuesday, September 7, 2021 5:18:06 PM

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The purpose of this message is to support the recommendation for the exception of the cost-effectiveness test and make a standard program offering for the replacement of inefficient manufactured homes with high-efficiency models. NOAH actively supported legislation during the 2019 legislative session sponsored by Rep. Marsh to create the manufactured home replacement program at Oregon Housing and Community Services Department.

The leverage of private loans with funding from OHCS and incentives from the Energy Trust are critical components a to successful home replacement program for low income Oregonians. Without these additional resources, few homes would be taken out of service. We recognize the important benefits for both healthy households and climate mitigation of taking old, inefficient homes out of use.

The tragic fires during September 2020 destroyed nearly 2,000 manufactured homes in Oregon. The majority of those homes were older, inefficient models in need of replacement, and owned by low and very low income Oregonians. For this reason, making this program permanent is vital to providing energy efficient replacement homes for wildfire survivors. I serve as the Chair of the Manufactured Housing Advisory Committee at Oregon Housing and Community Services. The Committee has been extensively involved in finalizing the replacement program and considering opportunities to support wildfire survivors and understand the scale of investment that will be necessary. Given the number of homes destroyed, we recommend increasing the limit of \$5,000,000 for this purpose during the exception period. Oregon will need considerably more efficiency resources to help wildfire survivors return to safe, energy efficient homes. Please consider doubling this allocation.

Many thanks.

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