

September 3, 2021

Members of the Oregon Public Utility Commission,

Thank you for the opportunity to provide testimony regarding the cost-effectiveness exception to support the replacement of inefficient manufactured homes with high-efficiency models.

My name is Waylon White, and I am the senior manager of Green Building Technical Services at Earth Advantage. At Earth Advantage, my team and I conducted audits of older inefficient manufactured homes in northeast Portland that were replaced in this program's pilot phase, and we have also conducted inspections for LEED requirements at multiple regional factories where energy-efficient new manufactured homes are built. Before joining Earth Advantage, I was a home performance contractor and Energy Trust Trade Ally from 2008-2012. My company, Green Energy Specialists, performed energy-saving air and duct sealing on manufactured homes as one of a select group of contractors paid directly by the Energy Trust for these activities.

My experience has taught me that the measure-by-measure approach is ineffective for improving the older, inefficient manufactured housing. As an example, in one of the replaced homes in the pilot, there were less than 10-year-old double-pane windows, most likely subsidized as part of the single-measure approach, but there was also a one-inch gap between the floor and the wall running the length of the living room. The home was uninhabitable because of this and other structural issues.

At Green Energy Specialists, about half the time existing health and safety issues prevented us from air sealing manufactured homes per our scope of work with the Energy Trust. During our work on manufactured homes, we also engaged a far more diverse clientele than we did when performing our market-rate home performance work.

During the inspections I conducted at manufactured housing factories, I have seen factory-style efficiency and precision with a focus on durability. The specific homes I inspected during those visits were built well above code, designed to achieve between 15-30% energy savings over a standard new home.

I support the cost-effectiveness exception for the replacement of inefficient manufactured homes with high-efficiency models, and transitioning from a pilot approach to a standard program offer.

Thank you for your time and consideration,
Waylon White