

From: [Rep Marsh](#)
To: [PUC.PUC.FilingCenter * PUC](#)
Subject: Manufactured Home Replacement Program, Docket No. UM 1696
Date: Monday, September 6, 2021 11:38:47 AM

September 6, 2021

Members of the Public Utility Commission:

I am writing to convey my enthusiastic support for the proposal submitted to the PUC by Energy Trust for continuation of the manufactured home replacement program.

My work in the legislature has included a sustained focus on our manufactured home sector. Manufactured homes comprise 8-10% of dwellings in the state and provide a significant proportion of our naturally occurring affordable housing stock. Unfortunately, nearly half of the 140,000 manufactured homes in the state were manufactured before 1980 — about the time that HUD implemented its first manufactured housing building code standards. These homes have minimal insulation and generate disproportionately high utility bills and associated health and safety issues.

We can continue to invest in weatherization projects for these homes, but the cost of that investment makes little sense given the depreciated value of the structure. Alternatively, replacement with a new home provides the resident with an energy efficient structure constructed with good materials and without the air quality and mold issues frequently present in older models. These are the significant non-qualifiable benefits referenced in the PUC staff memo.

I've been an enthusiastic support of the Energy Trust pilot program since its inception, but my experience in southern Oregon over the past year has given it particular meaning. In September 2020, the Almeda wildfire swept through my district, destroying approximately 1,500 manufactured homes in 18 parks. The families that were displaced were our most vulnerable populations — seniors, working people and Latinx residents. Many are struggling to return to the community and settle in new or refurbished manufactured home parks. But the costs of new or gently used manufactured homes will far exceed the old homes. The Energy Trust incentive, combined with state purchase incentives and possibly financing from other partners, will enable displaced families to come back home.

The Energy Trust manufactured home replacement program leverages energy efficiency dollars to create a long term investment in the health and welfare of participants. I urge the PUC to consider the multiple benefits demonstrated by the program and grant a permanent exception to the cost effectiveness standards.

Thank you so much for consideration of these comments.

Best,
Pam Marsh