

# Department of Energy Publishes 'Unacceptable' Manufactured Housing Energy Rule Extension per Manufactured Housing Assoc.

*Manufactured Housing Association for Regulatory Reform said Dep. of Energy (DOE) Federal Register Notice delay of MH energy rule "unacceptable," explaining why.*

WASHINGTON, D.C., UNITED STATES, June 1, 2023 /EINPresswire.com/ -- The Washington, D.C. based Manufactured Housing Association for Regulatory Reform (MHARR) issued a new release to manufactured home industry members and other interested parties on May 30, 2023. That release, [linked here on the MHARR website](#), stated that Department of Energy (DOE)

Federal Register notice updating the status of the DOE Manufactured Housing Energy Rule Extension was "unacceptable." The MHARR release including the following remarks.

MAY 30, 2023

TO: MHARR MANUFACTURERS  
MHARR STATE AFFILIATES  
MHARR TECHNICAL REVIEW GROUP (TRG)

FROM: MHARR

RE: DOE PUBLISHES UNACCEPTABLE ENERGY RULE EXTENSION

The U.S. Department of Energy (DOE) has published a final rule in the May 30, 2023 edition of the Federal Register to extend the date for compliance with the manufactured housing "energy



conservation” standards adopted on May 31, 2022. Under the final rule, manufacturers of single-section “Tier 1” homes will have until sixty (60) days after publication of the final DOE enforcement regulations to begin compliance with the new standards, while manufacturers of multi-section “Tier 2” homes will have until July 1, 2025 to comply.

While [MHARR supported an extension of the compliance date for the new standards](#), based on DOE’s failure to propose – and consider the cost-impact of – regulatory compliance, testing and enforcement procedures at the time it developed and initially

published its May 31, 2022 standards, MHARR has consistently opposed the DOE standards themselves as a baseless [attack on the affordability and availability of HUD Code manufactured homes](#) in violation of the National Manufactured Housing Construction and Safety Standards Act

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Rather than a mere delay, the entire DOE energy standards debacle deserves to be “killed,” as the Wall Street Journal declared in a May 9, 2023 editorial (please see copy attached).”

*Mark Weiss, J.D., President  
and CEO of MHARR.*

the industry’s most affordable single-section homes. Put simply, if multi-section “Tier 2” homes warrant a two-year compliance phase-in period, single-section “Tier 1” homes should, at a minimum, be treated in the same manner and not subject to a shorter, discriminatory phase-in period that will further distort a market that has been crippled by higher interest rates, higher supply costs and plummeting production over two consecutive quarters. Better yet, DOE’s entire May 31, 2022 standards rule should be jettisoned and replaced by a valid and legitimate rule, based on a valid and legitimate process, rather than a process that remains – and continues to be – infected by DOE’s corrupted 2014-2015 “negotiated rulemaking.”



DOE Delay of Manufactured Housing Costs Continue Increase says MHARR = <https://manufacturedhousingassociationregulatoryreform.org/despite-doe-delay-manufactured-housing-energy-standards-remain-unacceptable-as-costs-continue-to-increase/>

of 2000 (as amended). Thus, MHARR in its compliance extension comments, called once again on DOE to not only delay, but to totally withdraw its May 31, 2022 standards and to “go back to the drawing board” to develop new, appropriate and cost-justified standards in full accordance with both the Energy Independence and Security Act of 2007 and federal manufactured housing law.

What has emerged, however, in the wake of the final extension rule, is a set of unnecessary, excessive, market-killing energy standards, paired with a compliance scheme that already baselessly targets and discriminates against

As DOE's standards and compliance processes currently stand, however, moderate and lower-income American consumers who rely on the industry's most affordable homes, will be targeted with additional excessive and unnecessary costs first. Until the courts decide the fate of the inappropriate and excessive May 31, 2022 DOE standards, DOE should at a minimum treat all types of manufactured housing – and consumers – the same.

Rather than a mere delay, the entire DOE energy standards debacle deserves to be "killed," as the Wall Street Journal declared in a May 9, 2023 editorial (please see copy attached). MHARR will continue to aggressively pursue that end, as it has consistently for years.

cc: Other Interested HUD Code Manufactured Housing Industry Members

Attachment

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The MHARR release makes reference to the "corrupted" 2014-2015 negotiated rule making process. In a Q&A with MHProNews.com, MHARR's Senior Advisor Danny Ghorbani detailed the history of the DOE energy rule.

<https://manufacturedhousingassociationregulatoryreform.org/mhpronews-qa-with-danny-ghorbani/duty-to-serve-mh/#fifth>

See the fact packed Wall Street Journal (WSJ) op-ed referenced above on the MHARR website at this link below.

<https://manufacturedhousingassociationregulatoryreform.org/departments-of-energy-doe->

[publishes-unacceptable-manufactured-housing-energy-rule-extension/](#)

## About MHARR

The Manufactured Housing Association for Regulatory Reform is a Washington, D.C.-based national trade association representing the views and interests of independent producers of federally-regulated manufactured housing.

## Latest Manufactured Housing Industry National Production Reports

<https://manufacturedhousingassociationregulatoryreform.org/continuing-manufactured-home-production-decline-reflects-failure-to-address-and-correct-deepening-systemic-problems/>

The largest known collection of manufactured housing industry production facts online of year publicly available of monthly updates by any nonprofit group is found at this link below.

<https://manufacturedhousingassociationregulatoryreform.org/category/manufactured-home-shipments/>

## Latest Manufactured Housing Industry News from MHARR

The largest known collection online of manufactured housing industry focused news provided by a manufactured home industry nonprofit focused on independent producers' facts and views are found at this link below.

<https://manufacturedhousingassociationregulatoryreform.org/mharr-news/>

## MHARR Issues and Perspectives

MHARR Issues and Perspectives are insider-insights and fact-packed articles authored by MHARR President and CEO, Mark Weiss, J.D. Years of "Issues and Perspectives" are found at the link below. They routinely provide insights not found from other sources.

<https://manufacturedhousingassociationregulatoryreform.org/category/mharr-issues-and-perspectives/>

As the infographic shown with this press release indicates, key Issues holding manufactured housing industry at low ebb during an affordable housing crisis include the failure to fully and properly implement existing federal laws. The Manufactured Housing Improvement Act of 2000 and its 'enhanced preemption' provision is widely seen by industry professionals as not being properly enforced by the U.S. Department of Housing and Urban Development (HUD). Similarly, more cost effective manufactured home lending has been provided for by acts of Congress that

are apparently not being properly implemented.

## Collection of MHProNews Q&As with Founding MHARR President and Current Senior Advisor Danny Ghorbani

Danny Ghorbani was a vice president for the Manufactured Housing Institute (MHI) before leaving and becoming the founding president and CEO of MHARR. Ghorbani's career spans some 5 decades and was recognized by the RV MH Hall of Fame. He was an engineer and played a key role in developing some 200,000 home sites for factory built mobile home homes prior to the HUD Code manufactured housing era. Those Q&A style interviews with Ghorbani are found at this link below.

<https://manufacturedhousingassociationregulatoryreform.org/mhpronews-qa-with-danny-ghorbani/duty-to-serve-mh/>

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This press release can be viewed online at: <https://www.einpresswire.com/article/637133207>

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