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May 2, 2019

Via [energystarhomes@mail.energystar.gov](mailto:energystarhomes@mail.energystar.gov)

**Re: ENERGY STAR Certified Manufactured Home Version 2 – Request for Stakeholder Comments**

Dear ENERGY STAR Residential New Construction Team,

On behalf of ourselves, our client AEP Ohio and the AEP Ohio New Manufactured Homes Program, we would like to endorse formalization of the Electric Heat Pump Package as a path to ENERGY STAR certification included in this proposed update.

As a result of the addition of this optional pathway on a pilot basis in 2018, we have seen measurable growth in the number of new manufactured homes submitting for ENERGY STAR certification, and believe it creates an important opportunity to build momentum toward market adoption of more efficient, ENERGY STAR certified new manufactured homes.

Coupled with envelope improvements, installation of a new, high efficiency heat pump in an all-electric manufactured home represents a significant improvement in energy performance over a standard, HUD code compliant electric furnace. Most importantly, it drives a dramatic lowering of operating cost for renters and buyers of these homes, which is so important in a market aimed at providing an alternative affordable housing solution.

Please let us know if you have any questions regarding our experience with this pathway.

Sincerely,

Rebecca Mellino  
Program Manager  
MaGrann Associates

