May 6, 2019

To: Environmental Protection Agency, ENERGY STAR program staff

From: R. Brady Peeks, President, Northwest Energy Works, Northwest Energy Efficient Manufactured Housing Program Administrator

Re: Comments on proposed Version 2 ENERGY STAR certification requirements for manufactured homes

Northwest Energy Works appreciates the opportunity to comment on the EPA's proposed ENERGY STAR Certified Manufactured Homes, Version 2 document. As the administrator of the Northwest Energy Efficient Manufactured Homes Program (NEEM), we are pleased to have partnered with EPA as a QAP since 1999 to make available the ENERGY STAR mark of distinction to all of the manufactured housing producers in the Pacific Northwest. During 2018, the NEEM program delivered ENERGY STAR certification to 2,424 manufactured homes, representing some 52 percent of all manufactured homes produced in the region and shipped to a dozen states across the western United States.

The NEEM program takes a fundamentally different approach to delivering home certification than others working with manufactured home builders. Rather than defer to IPIA and manufacturer QC processes, the NEEM program maintains a regular inspection schedule in the factory. NEEM inspectors routinely help factories correct problems, improve construction processes and provide training to production crew members. The NEEM program's experience with over 30 years of working with the industry has found that the vast majority of issues affecting the energy efficiency of homes are best addressed in the factory.

The NEEM program continues to visit homes in the field, targeting homes that have known service issues, incorporate new features or where home owners request help understanding their utility bills and energy efficiency options. Even these homes, which we deem most likely to have issues, routinely pass duct and building envelope leakage tests. Increasingly, we find manufacturers incorporating duct crossovers into the floor system, eliminating the traditional crossover duct. With this construction detail, the infrequent incidence of crossover duct problems virtually disappears. We find that homes with conventional crossover ducts virtually always have them installed so as to be airtight and off the ground. In fact, the most common defects found during site visits involve compromised insulation found through infrared imaging—and that is despite the NEEM program's routine inspections and training in the plants.

Given the NEEM program's experience, we suggest the EPA consider modifying Item 6 of the ENERGY STAR Certification Process section of the document to read something like the following:

"6. The QAP will coordinate with the plant on an ongoing basis to conduct periodic in-plant and/or field evaluations of ENERGY STAR certified manufactured homes. In-plant and/or field evaluation shall be conducted on no less than two percent (2%) of a plant's ENERGY STAR certified manufactured homes under construction or sold and installed on a homeowner's site, or a minimum of one home each calendar year, whichever is greater."

The NEEM program inspects well over 2 percent of homes in production and in the field, but we agree that a well-operating factory and home retailer team can be inspected at a rate as low as 2 percent of production, if conformance remains high.