

# Manufactured Housing/Energy: ACEEE Article Discusses Energy Efficiency/HUD Code Developments

## Arkansas Environmental, Energy, and Water Law Blog



**Walter Wright, Jr.**  
wwright@mwlaw.com  
(501) 688.8839

08/09/2016

An August 3<sup>rd</sup> blog post by the American Council for an Energy-Efficient Economy ("ACEEE") titled *Mobile Homes Move Toward Efficiency* ("Article") discusses manufactured housing energy efficiency.

The ability of a manufactured house to use energy efficiently is just as important to its owner as the owner of a constructed house.

As noted in the *Article*, the role of setting standards for energy efficiency differ whether the structure is manufactured or constructed. States establish building codes for constructed houses while the federal government (through the Housing and Urban Development Code [HUD]) develops standards for manufactured housing. Applying state standards to manufactured housing is unworkable since the destination state after being manufactured may not be known.

The ACEEE post notes that many state energy codes have more stringent standards than the International Energy Conservation Code ("IEC") for constructed homes. In contrast, the *Article* states that the energy provisions of the HUD Code have not been revised since 1994. This inaction by HUD led to Congressional action.

The United States Department of Energy ("DOE") in response to a Congressional mandate initiated a negotiated rulemaking to establish manufactured housing standards based on the most recent IEC Code. DOE is stated to have recently issued a draft rule based on the 2015 version of the IEC Code. However, a number of changes were made and described by the author of the post as:

We reduced the number of climate regions from eight to four, divided mostly along state lines, to make implementation easier. We replaced the performance path with an overall building shell heat transfer (U-factor) requirement, the metric currently used in the HUD Code (and we left out the new Energy Rating Index, which the manufacturers did not plan to use.) We replaced the air leakage standard with construction quality requirements because it is hard to test a two-section home until it is assembled in the field. We adjusted for the lack of room to add roof insulation and still be able to truck the homes. And we eased up on required efficiency levels in the Southeast because manufacturers were especially concerned about the impact of the first cost on their low-income buyers there. But the standard would still save 28% compared to the HUD Code in that region.

The DOE version is projected to save the typical manufactured housing owner 27% of energy use.

[A link to the post can be found here.](#)