

June 11, 2018

421 SW Oak St., Suite 300
Portland, OR 97204

1.866.368.7878
503.546.6862 **fax**
energytrust.org

Portland Planning and Sustainability Commission
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

RE: Manufactured Dwelling Park Project

Dear Portland Planning and Sustainability Commission:

Thank you for this opportunity to provide Energy Trust of Oregon's perspective on the proposed new zoning designation for the Manufactured Dwelling Park Project. Energy Trust is an independent nonprofit organization that helps the customers of Portland General Electric, Pacific Power, Northwest Natural, Cascade Natural Gas and Avista save and generate clean, inexpensive energy. Energy Trust has a long history of working closely with the city of Portland to provide services for all eligible customers and keep energy costs low.

Pursuant to our grant agreement with the Oregon Public Utility Commission, Energy Trust does not advocate in support of, or in opposition to, policy initiatives such as the zoning proposal before you today. We would however, like to provide you with context regarding the challenges we face helping manufactured homeowners and renters lower their energy use and associated utility bills.

According to Oregon Department of Housing and Community Services (OHCS) there are approximately 80,000 currently occupied manufactured homes which were built prior to 1978. These older vintage homes were not subject to construction standards and were not designed to be used as permanent, year-round dwelling structures. Manufactured homes built prior to 1995 are beset by numerous challenges, not the least of which is that they are very energy inefficient. This embedded inefficiency forces occupants to spend a disproportionate amount of their income—often hundreds of dollars per month—on utility bills. The energy burden limits residents' ability to maintain and improve their homes, and the substandard condition of older homes can impede Energy Trust's ability to deliver cost-effective efficiency upgrades, leading electric and gas utilities to purchase additional, higher-cost energy resources.

To overcome these challenges, Energy Trust has worked with manufactured home builders, OHCS and nonprofit manufactured home park owners such as St. Vincent de Paul, CASA and others, to introduce a pilot program offering substantial efficiency incentives to help lower the cost of home replacement. These incentives, when combined with additional grants and financing offers, create a new opportunity for residents of older manufactured homes to replace the inefficient unit with a new,

efficient manufactured home. Energy Trust's energy efficiency incentive is based upon the energy savings realized over the useful life of the new home and will reduce the amount of the loan principal and associated payments. This can allow low- and moderate-income Oregonians to improve their living environment while helping utilities defer having to purchase more expensive generation resources and transmission infrastructure.

The risk of park closure, amongst other hazards, reduces the likelihood that the full value of energy savings will materialize and challenges our ability to expand our pilot program to additional sites in Portland and beyond. To the extent the proposed zoning ordinance may reduce the risk of park closure, it could provide Energy Trust with increased certainty and assist us in expanding our pilot.

I hope you find this context useful as you consider the manufactured home zoning proposal before you.

Sincerely,

Mark Wyman

Sr. Program Manager
Energy Trust of Oregon