

In the Matter of:

AMENDMENT OF THE REGULATIONS OF THE MANUFACTURED HOUSING PROGRAM, etc.

MX-2022-0012, VOL. I

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STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

TRANSCRIPT OF PROCEEDINGS

Rulemaking Hearing

October 4, 2021

Jefferson City, Missouri

Volume 1

In the Matter of:
Amendment of the Regulations)
of the Manufactured Housing)
Program of the Missouri)
Public Service Commission) File No. MX-2022-0012

MORRIS WOODRUFF, Presiding
CHIEF REGULATORY LAW JUDGE

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PROCEEDINGS

JUDGE WOODRUFF: All right. It's two o'clock, so let's go ahead and get started. We're here for a public comment rulemaking hearing.

This is Commission Case No. MX-2022-0012 and it concerns a proposal to amend for manufactured housing rules and to rescind a fifth rule. The purpose of this hearing is to take comments from the public. And Staff is also here and they'll be given a chance to comment about the rule. We'll let the members of the public speak first with staff going last so that they have a chance to respond to anything, any matters that are brought up by members of the public.

This hearing is also being webcast -- or conducted through Webex for virtual, and I note that Commissioner Kolkmeier is with us via Webex broadcast.

Commissioner Kolkmeier, you want to say anything?

I'm not hearing anything from him, so. We do have, as I indicated, several people here in the room. We don't have a set schedule as to who goes first, so anybody that wants to come forward, come on up to the podium. We'll hear what you have

1 to say. First off, would you tell us your name.

2 MR. HAGAR: Thomas Hagar. I'm with the
3 Missouri Manufactured Housing Association.

4 JUDGE WOODRUFF: Okay. What would you
5 like to tell us?

6 MR. HAGAR: Well, the information that we
7 have received over the last year and a half has been
8 a little bit scattered, and we just recently got some
9 significant numbers. What kind of jumps out at me is
10 we're seeing a trend in revenue from 2015 to 2020
11 where the revenue has actually increased well
12 over 2015. In 2020, it was the highest that we'd had
13 in six years.

14 Then we get to expenses. The fund itself
15 was at 41 percent. In 2020 it was at 3 percent. So
16 it's not going to take a whole lot at \$14,700 if
17 there's, at least, fiscal responsibility, that that
18 number should exceed zero and put it back in the
19 black.

20 One of the things that I haven't received
21 and I think is important is what the numbers are for
22 June 30th of 2021. If it's in excess of, then I
23 guess we're going in the right direction.

24 We realize that there is one inspector
25 that is not there any longer, but I'm at somewhat of

1 a disadvantage in that regard. I've been in this
2 industry since 1974, and I've worked with the Public
3 Service Commission through many of those years,
4 through a lot of different chairmen, through a lot of
5 different managers. And it never even came up
6 through all that period of time that we needed to
7 increase fees, especially to the extent that this
8 calls for. It's hitting everyone. It's hitting --
9 and the poorest of the group would be the installers
10 who we're losing and we can't afford to lose any more
11 than what we already are.

12 The retailers, secondly. We've gone
13 from 200-plus retailers in the state of Missouri down
14 to 28. Now, these are licensed, as I would call
15 them, street retailers. These are not including say
16 a manufactured housing community or someone that
17 might be selling homes on the side and just has a
18 license. These are 24/7 people that are running
19 these businesses and that's how much it shrunk.

20 Number of units, we hit 8,000 not all
21 that long ago. Now, we hope that we'll hit 1,200
22 to 1,500. That's the -- that's the hope. And the
23 way things are looking especially through this year
24 of the pandemic, most everybody's having a good year.
25 As they have a good year, so does the Public Service

1 Commission. They receive more money.

2 So I feel somewhat that maybe this is a
3 little premature. We have had inspectors as low as
4 one to two for the entire state. Now we're talking
5 about four and possibly five if -- if they're given
6 the opportunity to hire an additional person. But it
7 used to be one person would show up, one person would
8 come to my lot, one would, you know, inspect my
9 homes. That would be -- that's what I expected. And
10 if there was a consumer complaint, they handled it.

11 But now we're not dealing with that many
12 consumer complaints. Actually we're dealing with
13 anything from a half a dozen to maybe 20 or 30
14 maximum. But they're not dealing with consumer
15 complaints. They're dealing with inspections. So
16 the more inspections they can do, the better it looks
17 on paper. And that's -- and that's, again, what
18 we're dealing with, not that they're not doing the
19 best job that they can. I just feel that as being a
20 businessman for 30-plus years, that it takes a lot of
21 fiscal responsibility especially in these times to
22 make sure that we spend our money the way that we
23 should. And the consensus in our industry is that
24 that's got a long way to go. And with that, that's
25 really the extent of my comments.

1 JUDGE WOODRUFF: I have some questions
2 for you if you don't mind.

3 MR. HAGAR: Sure.

4 JUDGE WOODRUFF: You indicated you're
5 with the association. What was the name of the
6 association?

7 MR. HAGAR: Missouri Manufactured Housing
8 Association.

9 JUDGE WOODRUFF: Okay. And are you also
10 a business owner?

11 MR. HAGAR: No, not today.

12 JUDGE WOODRUFF: Okay. You were in the
13 past?

14 MR. HAGAR: Yes, for 30 years.

15 JUDGE WOODRUFF: Okay.

16 MR. HAGAR: And I was in the insurance
17 business seven years prior to that which dealt in
18 manufactured housing.

19 JUDGE WOODRUFF: Okay. And do you know
20 what the -- I'm just curious as to why -- why is
21 housing, manufactured housing sales down so much? Is
22 there a trend that's going on, or do we know?

23 MR. HAGAR: Well, I think it's -- it was
24 a combination of things. It was financing. There
25 were a lot of financing issues that were going on.

1 JUDGE WOODRUFF: Banks wouldn't make
2 loans? Is that --

3 MR. HAGAR: Banks wouldn't make loans.
4 HUD and so forth was not dependable as it was in
5 other forms of housing. That was a lot of it. A lot
6 of that's come back at this point in time, but it's
7 possible one of the other folks that's here with me
8 would be able to address that a little bit clearer
9 than I am.

10 JUDGE WOODRUFF: Okay. All right. Thank
11 you very much, Mr. Hagar.

12 Whoever else wants to come up. Good
13 afternoon.

14 MR. JAMIE SMITH: Good afternoon. My
15 name is Jamie Smith, and I am a currently president
16 of the board of directors for the Missouri
17 Manufactured Housing Association as well as general
18 manager for Clayton Homes of Lebanon, so I'm an
19 active dealer.

20 Preface, like I said, I mean, we're here
21 to work with the Public Service Commission. We view
22 them as allies, friends, not -- not adversaries. We
23 see the value of them, the importance of them.

24 The most glaring thing to me I guess that
25 would jump out for the proposals is in regards to

1 installers. Right now like most trade industries,
2 there's a shortage of installers right now, given the
3 service, the dealers that we have. So it is
4 concerning possibly putting up more barriers to -- to
5 getting new licensed installers in there as opposed
6 to making it easier to get licensed installers.
7 Because right now there are a lot more actual
8 manufactured homes installers that are on the market
9 that don't want to go through the licensing and
10 stuff, so they just do the used homes, secondary
11 homes market stuff where they don't have to go
12 through it. So my fear is they're losing more
13 installers for a -- for our industry that we're
14 already facing a shortage of, so that would be the
15 most glaring thing.

16 To dive into -- Tom asked me to speak on,
17 you mentioned the decline in the industry versus, you
18 know, prior decades and such. I've only been in the
19 industry since 2008, so I -- my experience goes no
20 further than that, but one of the most glaring things
21 is really zoning discrimination that we face. So
22 whereas a builder can go in -- a site builder can go
23 in and build really anywhere inside the city limits,
24 we face a lot of struggles with that. And with
25 federal preemption laws, we shouldn't be facing that,

1 but still a lot of local authority's regulations make
2 it very difficult being inside the city limits. So
3 we're restricted for the most part in our state to
4 primarily our rural-based business. You know, the
5 homes are built to stronger standards than a lot of
6 site-built homes, and new site-built homes especially
7 in the markets we're selling into. But deal with
8 zoning, it makes it very difficult to -- you know, to
9 hit a lot of the market that we can serve
10 effectively. So that's really the extent of anything
11 I had to say.

12 JUDGE WOODRUFF: Okay.

13 MR. JAMIE SMITH: Thank you.

14 JUDGE WOODRUFF: I have a question too.

15 MR. JAMIE SMITH: You bet.

16 JUDGE WOODRUFF: Did you mention about
17 the installers, concern about the shortage of
18 installers?

19 MR. JAMIE SMITH: Correct.

20 JUDGE WOODRUFF: Do you have a reason why
21 that might be happening?

22 MR. JAMIE SMITH: You know, I think it
23 goes just to construction in general. I mean,
24 there's just labor shortages. You know, installers,
25 they face the same -- same shortage of help and labor

1 as anybody does. It's -- it's a hard business. I
2 mean, the -- being a manufactured home installer is
3 not an easy job, so it's not really one that you can
4 really learn from anything else either. I mean, you
5 have to be in the business. A lot of the times,
6 people that grew up in it, their families are in it.
7 So it's not necessarily an attractive position for
8 somebody to jump into, so. That's hard work.

9 And then the -- you know, there are
10 multiple installers out there, so they don't have to
11 be licensed to be -- to set up used homes or remove
12 used homes, so there's plenty that don't want to go
13 through the licensing aspect to install new homes.
14 And obviously, I mean, the -- the plethora -- the
15 sustainability of our industry and for both sides,
16 the regulatory side as well, we need licensed
17 installers, so. It's, yeah, dwindling some. You
18 have people that may have been in it for decades and
19 they retire and there's no succession plan for their
20 company so they just go out of business and just not
21 a lot of young people jump on that train really, so.

22 JUDGE WOODRUFF: Now, when the
23 Manufactured Housing Department charges a fee to
24 installers --

25 MR. JAMIE SMITH: Uh-huh.

1 JUDGE WOODRUFF: -- as a practical
2 matter, who actually pays that fee?

3 Is it the installers that pay for it or
4 is it the dealer that pays on behalf of the
5 installers?

6 MR. JAMIE SMITH: The installers do,
7 yeah.

8 JUDGE WOODRUFF: Okay. Out of the fee
9 that they charge?

10 MR. JAMIE SMITH: Right. Right. I mean,
11 everything's passed on to us in some way.

12 JUDGE WOODRUFF: Well, sure.

13 MR. JAMIE SMITH: But, yeah. They are
14 the ones responsible and actually paying.

15 JUDGE WOODRUFF: Okay. That's all the
16 questions I had then.

17 MR. JAMIE SMITH: Okay.

18 JUDGE WOODRUFF: Thank you.

19 MR. JAMIE SMITH: Thank you. You bet.

20 JUDGE WOODRUFF: And who's next? Anybody
21 else want to come forward and speak? Okay. And then
22 we'll move over to Staff.

23 MS. BRETZ: Good afternoon, may it please
24 the commission. My name is Karen Bretz and I
25 represent the Staff of the Commission's Manufactured

1 Housing and Modular Units Program.

2 Thank you today for hearing testimony
3 regarding this rulemaking proposal. This proposal,
4 as you've stated, increases four program fees and
5 rescinds one fee for a license which hasn't been
6 applied for for a while. These fee increases are
7 necessary to stabilize the program's financial
8 footing and to ensure that it operates with adequate
9 resources.

10 Although program revenues exceeded
11 expenses last year, that's not the trend. Going back
12 as far as fiscal year 2015 through fiscal year 2020,
13 the program operated at a deficit, and these
14 amendments are overdue.

15 And I apologize, we weren't able to get
16 fiscal year 2021 information in last Friday, but we
17 can supply the -- we can provide an update to our
18 rulemaking report that has the FY 2021 information in
19 it.

20 With me today is Justin Smith who is the
21 program's manager, and he's available for questions.

22 From its beginning the Commission
23 regulated electricity, gas and water and wastewater
24 utilities. The Manufactured Housing and Modular
25 Units Program is relatively new. And while it has

1 fewer cases before the Commission than the utilities
2 do, its employees are still very busy. I will
3 briefly summarize the program's work.

4 First, what is a manufactured home and
5 what's a modular unit. Our regulations have separate
6 rules and fees for each. This rulemaking involves
7 both manufactured housing and modular units so it's
8 helpful to know the difference. A manufactured home
9 is a prefabricated structure of at least 320 square
10 feet designed to be a dwelling unit. It can be
11 placed on either a permanent or a not-permanent
12 foundation. Manufactured homes have a permanent
13 chassis of axles and wheels so they're always
14 transportable. The U.S. Department of Housing and
15 Urban Development, HUD, establishes design and safety
16 standard for manufactured homes.

17 The definition of a modular home is more
18 expansive. A modular unit can be any size and it's
19 used for residential, commercial, educational, or
20 industrial purposes. Like a manufactured home, a
21 modular unit is prefabricated and is transportable,
22 but it doesn't have axles and wheels. It's usually
23 transported on a flatbed truck. HUD does not
24 regulate modular units.

25 Our program approves manufacturers' plans

1 and oversees seals that are affixed to units showing
2 that they were manufactured in accordance with those
3 plans. The program usually performs between 500
4 and 700 on-site inspections of manufactured homes and
5 modular units annually. These inspections are
6 scattered throughout Missouri. Last year, fiscal
7 year 2021 which was during COVID of course, the
8 program inspected 436. The program oversees and
9 trains about 70 licensed installers. Last year the
10 program made the installer's training available
11 online through another rulemaking procedure. The
12 program also licenses manufacturers and dealers.
13 Last year it inspected 21 dealer lots which resulted
14 in three dealer lot investigations.

15 The program typically receives between 15
16 and 30 informal consumer complaints annually. During
17 fiscal year 2021, the program handled 12. The
18 program also consistently has a few formal complaints
19 before the Commission. And as Mr. Hagar stated,
20 there is a low number of complaints, and this low
21 number of complaints is indicative that the system
22 that we have in place is working. He suggested that
23 perhaps we could make do with fewer inspectors, but
24 the number of inspectors feeds into the number of
25 inspections which helps to keep complaints down

1 because when there's more inspections being -- taking
2 place, complaints can be -- or issues can be raised
3 and dealt with informally rather than even -- even --
4 rather than even coming to the informal or formal
5 process.

6 Currently the program has six full-time
7 equivalent, FTE, employees. Needless to say, this is
8 a busy office. Speaking of the office, it has three
9 full-time inspectors covering the entire state. The
10 program basically divides the state into quadrants,
11 so each inspector has one -- has one quadrant, and
12 there's an open position now.

13 Mr. Hagar also suggested that it would
14 be -- making due with one or two inspectors is just
15 not feasible either. There's no way physically that
16 one or two inspectors can traverse the whole state to
17 take care of hundreds of inspections.

18 Mr. Smith, who I introduced to you,
19 performs inspections in addition to being the
20 manager. The program is one -- short one time [sic]
21 inspector and hopes to fill this position soon.
22 Today one new administrative person started work to
23 join the other administrative person.

24 Before getting into specifics of the
25 proposed amendments, I will provide context of the

1 program's financial situation which basically drives
2 this rulemaking. State law requires the Commission
3 to establish fees sufficient to cover the program's
4 administration costs. At the same time the
5 Commission shares authority for setting fees with two
6 other jurisdictions that the Commission has no
7 control over.

8 Missouri law sets manufacturer and dealer
9 registration fees. These are the program's largest
10 source of funding. In fiscal year 2021, the program
11 received about 170,000 from manufactured --
12 manufacturer and dealer fees.

13 The program's second largest source of
14 funding is federal HUD state administrative agency or
15 SAA payments. The program partners with HUD to
16 enforce federal standards for manufactured home
17 design, construction, and installation. HUD
18 distributes funds to SAAs, such as our commission,
19 based on a formula. Missouri receives about a
20 hundred thousand dollars in HUD SAA funds annually.

21 The Commission regulates fees which
22 generate smaller funds including the ones in this
23 rulemaking. And I would like to note, too, that all
24 of the program's funding comes from fees and SAA
25 payments. It receives no funding from the

1 Commission's annual assessment to the utilities.

2 State law requires fees to be deposited
3 in the Manufactured Housing Fund which pays out
4 program expenses. Fiscal year 2021 was the first
5 year in some time that the program did not operate at
6 a deficit. Going back as far -- at least as far back
7 as fiscal year 2015 through fiscal year 2020, the
8 program's expenditures exceeded revenues. The
9 difference was made up by drawing from the fund.

10 According-- accordingly, the fund's
11 balances have steadily declined. The program's
12 fiscal year runs from July 1 through June 30.

13 On June 30, 2014, the fund's balance was
14 almost \$800,000. Its balance on June 30th, 2021
15 was \$228,204. Without an increase in fees, it is
16 likely that the fund will be further depleted and
17 eventually drained.

18 The program operates on a tight
19 budget keeping its annual expenses between 500,000
20 and 550,000. The program has been able to hold down
21 expenses despite cost of living increases, position
22 reclassifications, which increase salaries, and
23 increases in gas costs, equipment costs, all the
24 normal costs. However, revenues do not predictably
25 meet expenses.

1 Fee increases are long overdue. Based on
2 my research, fees included in this rulemaking were
3 most recently included in the 2001 through 2005 time
4 frame. In this rulemaking the program proposes to
5 increase four fees and eliminate one. The fee
6 increases will be paid by the manufacturers and the
7 manufactured home installers. None will be paid by
8 dealers.

9 Staff proposes raising the following
10 fees. The fee at 20 CSR 4240-120.140, sub 1 requires
11 manufactured home manufacturers to pay an inspection
12 fee of \$30 for each home delivered or sold to a
13 Missouri dealer. The program proposes to increase
14 this fee to \$75.

15 At 20 CSR 4240-123.030 sub 3(b), modular
16 unit manufacturers are required to pay a fee of \$110
17 for each modular unit seal. This seal certifies that
18 the unit was built in accordance with PSC approved
19 manufacturing programs. The program proposes to
20 increase this fee to \$220.

21 20 CSR 4240-123.040 sub 11(a) is the rule
22 which requires modular unit manufacturers to pay an
23 annual fee of \$75 for renewal of each modular unit
24 plan and production. The program proposes to
25 increase this fee to \$150.

1 20 CSR 4240-125.040 sub 1(a) requires
2 manufactured home installers to pay an annual fee
3 of \$150 dollars for an installer license. The
4 program proposes to increase this fee to 225.

5 One fee is proposed for rescission. This
6 is at 20 CSR 4240-125.050 sub 1 which requires
7 manufactured home installers to pay the fee of \$150
8 for a limited-use installer license. This
9 limited-use installer license allows a person to do
10 the work of a licensed installer under a licensed
11 installer's supervision. No one has applied for this
12 license for a while. In my research of other states,
13 I did not find any other state offering a similar
14 license.

15 Consistent with Governor Greitens'
16 mandate that departments streamline regulations, the
17 program believes this is right for elimination.

18 Based on the number of these fees
19 typically paid annually, Staff estimate these
20 increases will bring annual revenues, additional
21 revenues of \$151,770. Promulgation of the proposed
22 rule should ensure that the program's revenues match
23 expenditures with an extra cushion to build back the
24 Manufactured Housing Fund balance.

25 The fiscal impact will be shared as

1 follows. As a group, the manufactured home
2 manufacturers will pay approximately \$54,720
3 annually. The modular unit manufacturers as a whole
4 will pay approximately \$91,650 annually. And the
5 installers will pay approximately \$5,400 annually.

6 The program is sensitive to the fact that
7 this is a large percentage increase in fees, but
8 these increases are long overdue. A PSC internal
9 audit of the Manufactured Home and Modular Units
10 Program was completed in 2019. Its primary
11 recommendation is that, quote, An increase to some or
12 all of the fees currently imposed by the program to
13 finance its activities should be considered to
14 eliminate the current annual fund imbalance, end of
15 quote.

16 The fees proposed to be increased in this
17 rulemaking have not been updated for at least 15
18 years. The program's effectiveness is dependent upon
19 sufficient staffing and resources. Fees should be
20 modernized to accurately reflect program costs.
21 Thank you. And as I stated, Mr. Smith is here too
22 for questions.

23 JUDGE WOODRUFF: I have some questions.
24 If you can answer them, Ms. Bretz, that's fine. If
25 we need to bring Mr. Smith up to the podium --

1 MS. BRETZ: Sure.

2 JUDGE WOODRUFF: -- we can do that too.

3 It was mentioned that if manufactured
4 home sales were to pick up, this increase might not
5 be necessary. Do you agree or disagree with that?

6 MR. JUSTIN SMITH: Due respect, I
7 disagree with that. There would be some difference,
8 but nothing monumental to represent the imbalance
9 we've showing for the last seven years plus.

10 JUDGE WOODRUFF: If you could identify
11 yourself for the court reporter.

12 MR. JUSTIN SMITH: Justin Smith.

13 JUDGE WOODRUFF: And you're the director
14 of the Manufactured Housing --

15 MR. JUSTIN SMITH: Yeah. Regular --
16 regulatory compliance manager for Manufactured
17 Housing and Modular Units Program.

18 MS. BRETZ: And I would also add, Judge,
19 too, that the program is short one inspector. The
20 inspector for southwest Missouri is an unfunded
21 position basically. And so the program hopes in the
22 near future to be able to have an inspector for that
23 area and so that will alleviate some of the burden
24 off the other inspectors who have to travel down
25 there to make up for that.

1 JUDGE WOODRUFF: And it's my
2 understanding that the inspectors are based at
3 various locations around the state, not necessarily
4 here in Jefferson City?

5 MR. JUSTIN SMITH: Correct.

6 JUDGE WOODRUFF: Okay. Ms. Bretz, you
7 mentioned that you were concerned that the fund would
8 eventually be drained. Can you just say what would
9 happen if the fund were to be drained.

10 MS. BRETZ: I guess I can't really
11 predict what would happen. There would be no more --
12 you mean as a legal matter?

13 JUDGE WOODRUFF: Both as legal and
14 practical.

15 MS. BRETZ: I guess I don't know. Of
16 course there would be no funds then to make up any
17 imbalances between the revenues and expenses. I
18 guess I can't predict any further than that.

19 JUDGE WOODRUFF: Okay. Where does the
20 money come from that's in the fund now? Is it just
21 excesses from years past? Is that what goes into the
22 fund?

23 MS. BRETZ: I apologize; I'm not totally
24 up to speed with that. But I understand that this
25 money was set aside kind of to -- to get things

1 started, to -- to jump start the program and to
2 provide seed money for the program. And that the
3 idea was eventually that the -- that the expenses
4 would meet revenues. And as I stated, it hasn't
5 happened that way in -- for quite a while, so the
6 fund has been drawn down.

7 JUDGE WOODRUFF: So it's kind of a rainy
8 day fund? Is that -- I don't know if that's the term
9 to use for it or not.

10 MR. JUSTIN SMITH: It's built up over the
11 years and as I understand it, I've only been here
12 seven years, but the programs used to have other
13 functions involved with the preowned home market.
14 There was a time when they were inspecting and
15 regulating the recreational vehicle market as well;
16 RVs were a part of this unit or program, which are no
17 longer sources of revenue for the program. It's
18 dwindled down and focused on new manufactured homes
19 in the state and modular units.

20 JUDGE WOODRUFF: Okay. The rule that's
21 being rescinded is about limited-use installer
22 licenses. You indicated it's seldom been used. And
23 there was also a statement from Mr. Smith, Mr. Jamie
24 Smith I believe, indicating that there's a shortage
25 of installers. Would this limited-use installer

1 license be helpful in dealing with that shortage?

2 MR. JUSTIN SMITH: I don't believe so.
3 It's been in our rules for a very long time. No one
4 seems to use it. It's just -- it's set up the same
5 as a primary installer license, so everyone that's
6 going through the process gets their primary license.
7 No one goes for that option. And the way the rule's
8 set up, it's the same cost with less functionality.

9 JUDGE WOODRUFF: Okay. Thank you.
10 Anything else from staff?

11 MS. BRETZ: Nothing. Thank you.

12 JUDGE WOODRUFF: I'll bring it back to
13 the industry. Anything you want -- that Staff said
14 that you want to respond to?

15 MR. HAGAR: Well, I think --

16 JUDGE WOODRUFF: You need to come up to
17 the microphone, otherwise they can't hear you
18 otherwise the room.

19 MR. HAGAR: There's a -- there's a few
20 things. When this program, just to clarify, started
21 in 1976, it was a result of Congress of the United
22 States putting into effect a code for mobile homes at
23 that time. And so it moved on from there. We as the
24 industry wrote checks personally to support the
25 process of -- because no one in the Public Service

1 Commission had ever dealt with this; it was mainly,
2 as you know, utilities and so forth. But that's
3 what -- that's what occurred.

4 At the rate -- I heard a number for
5 year-end 2021. Was that 228?

6 MS. BRETZ: Which number?

7 MR. HAGAR: The fund balance.

8 MS. BRETZ: Oh, it's -- the fund balance
9 is \$228,204 as of June 30, '21.

10 MR. HAGAR: Okay. So as of June 30th.
11 And in 2020 it was 14,700. So to me if I'm looking
12 at it, I'm seeing it gone in the black at this point
13 in time. And a lot of that is because of the
14 programs that we have, because of the present
15 inspections that we have and so forth. At the rate,
16 as an example, of even the \$14,700 and we had an
17 ending balance of \$206,867, it would take 14 years to
18 become fully depleted. Now, I don't believe in 14
19 years that this thing is going to be in the red.
20 It's not moving in that direction. We have a
21 tremendous number as far as quality of retailers
22 today. We went from 200 when I had my store, to
23 roughly 28 to 30 now and that number is -- is just
24 because. It's required more as people got older. I
25 got older and decided this wasn't something I wanted

1 to keep doing. But it's interesting to hear those
2 numbers.

3 Just to clarify, and whether it's
4 important in this session or not, but modular homes
5 are not units that are all brought in on flat beds.
6 Modular homes are built to a standard, and that's the
7 difference between the two. You have a building code
8 that is residential code that applies to them. We
9 don't deal in any kind of commercial office
10 buildings. We don't deal in any kind of apartments
11 or whatever. We deal strictly in the modular units.
12 They come in on tires and wheels by the majority from
13 the factory. And that's -- and they're
14 indistinguishable really from manufactured housing
15 today. So just a point of clarification.

16 But that's -- I mean, that's good news, I
17 mean, to see that the fund has actually grown and so
18 forth over the last year is good and I would expect
19 it to be higher than that this coming year.

20 So with that, I think it's a good reason
21 that this is possibly delayed for at least a couple
22 years to see where it goes. And unless they pay an
23 inspector a hundred thousand dollars a year, it
24 sounds to me like it's going to be -- more than be
25 able to cover any -- any expense in that regard.

1 One thing I wasn't -- we met the other
2 day with Justin and his boss and we talked about
3 retirees and so forth and the effect on the fund. I
4 don't know that that does or doesn't. I understood
5 from our meeting that it did. And then I looked at
6 some other things and it said it did not, that it was
7 something that went through the Public Service
8 Commission itself. So that's something there that if
9 it does, that should have relieved a lot of the
10 expense and so forth on this as well. Thank you.

11 JUDGE WOODRUFF: Thank you very much.

12 Anything else from the industry?

13 Staff, I'll let you have the last word.

14 MS. BRETZ: Just a couple points.

15 Mr. Hagar -- Mr. Hagar talked about the amount, how
16 the fund is operating. I would just like to stress
17 that the -- the office has been operating on bare
18 bones shoestring for the last number of years.
19 They -- the office just hired one administrative
20 person who started today. They're hoping to hire
21 another inspector to fill a position that is unfilled
22 so far. So from Mr. Hagar's perspective if the
23 program does continue to operate bare bones and not
24 meet its statutory duties of expenses and revenues
25 being the same, we can keep on kicking this down the

1 road. But in order to fulfill its mission, to
2 provide a service to the people who buy manufactured
3 homes and modular units, it's important for this fee
4 increase to take place. Thank you very much.

5 JUDGE WOODRUFF: Thank you. Anything
6 else anyone wants to add at this point? I don't see
7 anybody raising their hands, so at this point we will
8 adjourn. Thank you.

9 (Off the record.)

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CERTIFICATE

I, Shelley L. Bartels, a Certified Court Reporter, CCR No. 679, the officer before whom the foregoing transcript of proceedings was taken, do hereby certify that the testimony was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this transcript of proceedings was taken, and further, that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.



Shelley L. Bartels, CCR

\$	200-plus 5:13	5	adversaries 8:22
\$110 19:16	2001 19:3		affixed 15:1
\$14,700 4:16 26:16	2005 19:3	500 15:3	afford 5:10
\$150 19:25 20:3,7	2008 9:19	500,000 18:19	afternoon 8:13,14 12:23
\$151,770 20:21	2014 18:13	550,000 18:20	agency 17:14
\$206,867 26:17	2015 4:10,12 13:12 18:7	6	agree 22:5
\$220 19:20	2019 21:10		alleviate 22:23
\$228,204 18:15 26:9	2020 4:10,12,15 13:12 18:7 26:11	679 30:3	allies 8:22
\$30 19:12	2021 4:22 13:16,18 15:7,17 17:10 18:4,14 26:5	7	amendments 13:14 16:25
\$5,400 21:5	21 15:13 26:9	70 15:9	amount 28:15
\$54,720 21:2	225 20:4	700 15:4	annual 18:1,19 19:23 20:2,20 21:14
\$75 19:14,23	228 26:5	8	annually 15:5,16 17:20 20:19 21:3,4,5
\$800,000 18:14	24/7 5:18	8,000 5:20	apartments 27:10
\$91,650 21:4	28 5:14 26:23	A	apologize 13:15 23:23
1	3	ability 30:6	applied 13:6 20:11
1 18:12 19:10 20:6	3 4:15	accordance 15:2 19:18	applies 27:8
1(a) 20:1	3(b) 19:15	According-- 18:10	approved 19:18
1,200 5:21	30 6:13 7:14 15:16 18:12,13 26:9,23	accurately 21:20	approves 14:25
1,500 5:22	30-plus 6:20	action 30:9,13	approximately 21:2, 4,5
11(a) 19:21	30th 4:22 18:14 26:10	active 8:19	area 22:23
12 15:17	320 14:9	activities 21:13	aspect 11:13
14 26:17,18	4	actual 9:7	assessment 18:1
14,700 26:11	41 4:15	add 22:18 29:6	association 4:3 7:5, 6,8 8:17
15 15:15 21:17	4240-120.140 19:10	addition 16:19	attorney 30:11
170,000 17:11	4240-123.030 19:15	additional 6:6 20:20	attractive 11:7
1974 5:2	4240-123.040 19:21	address 8:8	audit 21:9
1976 25:21	4240-125.040 20:1	adequate 13:8	authority 17:5
2	4240-125.050 20:6	adjourn 29:8	authority's 10:1
20 6:13 19:10,15,21 20:1,6	436 15:8	administration 17:4	axles 14:13,22
200 26:22		administrative 16:22,23 17:14 28:19	

B	<p>built 10:5 19:18 24:10 27:6</p> <p>burden 22:23</p> <p>business 7:10,17 10:4 11:1,5,20</p> <p>businesses 5:19</p> <p>businessman 6:20</p> <p>busy 14:2 16:8</p> <p>buy 29:2</p>	<p>commission 5:3 6:1 8:21 12:24 13:22 14:1 15:19 17:2,5,6,18,21 26:1 28:8</p> <p>Commission's 12:25 18:1</p> <p>community 5:16</p> <p>company 11:20</p> <p>complaint 6:10</p> <p>complaints 6:12,15 15:16,18,20,21,25 16:2</p> <p>completed 21:10</p> <p>compliance 22:16</p> <p>concern 10:17</p> <p>concerned 23:7</p> <p>Congress 25:21</p> <p>consensus 6:23</p> <p>considered 21:13</p> <p>Consistent 20:15</p> <p>consistently 15:18</p> <p>construction 10:23 17:17</p> <p>consumer 6:10,12,14 15:16</p> <p>context 16:25</p> <p>continue 28:23</p> <p>control 17:7</p> <p>Correct 10:19 23:5</p> <p>cost 18:21 25:8</p> <p>costs 17:4 18:23,24 21:20</p> <p>counsel 30:8,11</p> <p>couple 27:21 28:14</p> <p>court 22:11 30:2</p> <p>cover 17:3 27:25</p> <p>covering 16:9</p>	<p>COVID 15:7</p> <p>CSR 19:10,15,21 20:1,6</p> <p>curious 7:20</p> <p>current 21:14</p> <p>cushion 20:23</p>
	C		D
<p>back 4:18 8:6 13:11 18:6 20:23 25:12</p> <p>balance 18:13,14 20:24 26:7,8,17</p> <p>balances 18:11</p> <p>Banks 8:1,3</p> <p>bare 28:17,23</p> <p>barriers 9:4</p> <p>Bartels 30:2,17</p> <p>based 17:19 19:1 20:18 23:2</p> <p>basically 16:10 17:1 22:21</p> <p>beds 27:5</p> <p>beginning 13:22</p> <p>behalf 12:4</p> <p>believes 20:17</p> <p>bet 10:15 12:19</p> <p>bit 4:8 8:8</p> <p>black 4:19 26:12</p> <p>board 8:16</p> <p>bones 28:18,23</p> <p>boss 28:2</p> <p>Bretz 12:23,24 21:24 22:1,18 23:6,10,15,23 25:11 26:6,8 28:14</p> <p>briefly 14:3</p> <p>bring 20:20 21:25 25:12</p> <p>brought 27:5</p> <p>budget 18:19</p> <p>build 9:23 20:23</p> <p>builder 9:22</p> <p>building 27:7</p> <p>buildings 27:10</p>	<p>call 5:14</p> <p>calls 5:8</p> <p>care 16:17</p> <p>cases 14:1</p> <p>CCR 30:3,17</p> <p>CERTIFICATE 30:1</p> <p>Certified 30:2</p> <p>certifies 19:17</p> <p>certify 30:5</p> <p>chairmen 5:4</p> <p>charge 12:9</p> <p>charges 11:23</p> <p>chassis 14:13</p> <p>checks 25:24</p> <p>city 9:23 10:2 23:4</p> <p>clarification 27:15</p> <p>clarify 25:20 27:3</p> <p>Clayton 8:18</p> <p>clearer 8:8</p> <p>code 25:22 27:7,8</p> <p>combination 7:24</p> <p>comments 6:25</p> <p>commercial 14:19 27:9</p>	<p>day 24:8 28:2</p> <p>deal 10:7 27:9,10,11</p> <p>dealer 8:19 12:4 15:13,14 17:8,12 19:13</p> <p>dealers 9:3 15:12 19:8</p> <p>dealing 6:11,12,14, 15,18 25:1</p> <p>dealt 7:17 16:3 26:1</p> <p>decades 9:18 11:18</p> <p>decided 26:25</p> <p>decline 9:17</p> <p>declined 18:11</p> <p>deficit 13:13 18:6</p> <p>definition 14:17</p> <p>delayed 27:21</p> <p>delivered 19:12</p> <p>Department 11:23 14:14</p> <p>departments 20:16</p> <p>dependable 8:4</p> <p>dependent 21:18</p> <p>depleted 18:16 26:18</p> <p>deposited 18:2</p> <p>design 14:15 17:17</p> <p>designed 14:10</p> <p>Development 14:15</p>	

difference 14:8 18:9 22:7 27:7	elimination 20:17		foregoing 30:4
difficult 10:2,8	employed 30:8,12	F	formal 15:18 16:4
direction 4:23 26:20 30:7	employee 30:11	face 9:21,24 10:25	forms 8:5
director 22:13	employees 14:2 16:7	facing 9:14,25	formula 17:19
directors 8:16	end 21:14	fact 21:6	forward 12:21
disadvantage 5:1	ending 26:17	factory 27:13	foundation 14:12
disagree 22:5,7	enforce 17:16	families 11:6	frame 19:4
discrimination 9:21	ensure 13:8 20:22	fear 9:12	Friday 13:16
distributes 17:18	entire 6:4 16:9	feasible 16:15	friends 8:22
dive 9:16	equipment 18:23	federal 9:25 17:14,16	FTE 16:7
divides 16:10	equivalent 16:7	fee 11:23 12:2,8 13:5, 6 19:1,5,10,12,14,16, 20,23,25 20:2,4,5,7 29:3	fulfill 29:1
dollars 17:20 20:3 27:23	establish 17:3	feeds 15:24	full-time 16:6,9
dozen 6:13	establishes 14:15	feel 6:2,19	fully 26:18
drained 18:17 23:8,9	estimate 20:19	fees 5:7 13:4 14:6 17:3,5,9,12,21,24 18:2,15 19:2,5,10 20:18 21:7,12,16,19	functionality 25:8
drawing 18:9	eventually 18:17 23:8 24:3	feet 14:10	functions 24:13
drawn 24:6	everybody's 5:24	fewer 14:1 15:23	fund 4:14 18:3,9,16 20:24 21:14 23:7,9,20, 22 24:6,8 26:7,8 27:17 28:3,16
drives 17:1	everything's 12:11	fill 16:21 28:21	fund's 18:10,13
due 16:14 22:6	exceed 4:18	finance 21:13	funding 17:10,14,24, 25
duties 28:24	exceeded 13:10 18:8	financial 13:7 17:1	funds 17:18,20,22 23:16
dwelling 14:10	excess 4:22	financially 30:12	future 22:22
dwindled 24:18	excesses 23:21	financing 7:24,25	FY 13:18
dwindling 11:17	expansive 14:18	find 20:13	G
E	expect 27:18	fine 21:24	gas 13:23 18:23
	expected 6:9	fiscal 4:17 6:21 13:12, 16 15:6,17 17:10 18:4, 7,12 20:25	general 8:17 10:23
	expenditures 18:8 20:23	flat 27:5	generate 17:22
easier 9:6	expense 27:25 28:10	flatbed 14:23	glaring 8:24 9:15,20
easy 11:3	expenses 4:14 13:11 18:4,19,21,25 23:17 24:3 28:24	focused 24:18	good 5:24,25 8:12,14 12:23 27:16,18,20
educational 14:19	experience 9:19	folks 8:7	Governor 20:15
effect 25:22 28:3	extent 5:7 6:25 10:10	footing 13:8	Greitens' 20:15
effectively 10:10	extra 20:23		
effectiveness 21:18			
electricity 13:23			
eliminate 19:5 21:14			

grew 11:6	15:4 24:18 25:22 27:4, 6 29:3	industrial 14:20	investigations 15:14
group 5:9 21:1		industries 9:1	involved 24:13
grown 27:17	hope 5:21,22	industry 5:2 6:23 9:13,17,19 11:15 25:13,24 28:12	involves 14:6
guess 4:23 8:24 23:10,15,18	hopes 16:21 22:21	informal 15:16 16:4	issues 7:25 16:2
<hr/> H <hr/>	hoping 28:20	informally 16:3	<hr/> J <hr/>
Hagar 4:2,6 7:3,7,11, 14,16,23 8:3,11 15:19 16:13 25:15,19 26:7, 10 28:15	housing 4:3 5:16 7:7, 18,21 8:5,17 11:23 13:1,24 14:7,14 18:3 20:24 22:14,17 27:14	information 4:6 13:16,18	Jamie 8:14,15 10:13, 15,19,22 11:25 12:6, 10,13,17,19 24:23
Hagar's 28:22	HUD 8:4 14:15,23 17:14,15,17,20	inside 9:23 10:2	Jefferson 23:4
half 4:7 6:13	hundred 17:20 27:23	inspect 6:8	job 6:19 11:3
handled 6:10 15:17	hundreds 16:17	inspected 15:8,13	join 16:23
hands 29:7	<hr/> I <hr/>	inspecting 24:14	Judge 4:4 7:1,4,9,12, 15,19 8:1,10 10:12,14, 16,20 11:22 12:1,8,12, 15,18,20 21:23 22:2, 10,13,18 23:1,6,13,19 24:7,20 25:9,12,16 28:11 29:5
happen 23:9,11	idea 24:3	inspection 19:11	July 18:12
happened 24:5	identify 22:10	inspections 6:15,16 15:4,5,25 16:1,17,19 26:15	jump 8:25 11:8,21 24:1
happening 10:21	imbalance 21:14 22:8	inspector 4:24 16:11, 21 22:19,20,22 27:23 28:21	jumps 4:9
hard 11:1,8	imbalances 23:17	inspectors 6:3 15:23, 24 16:9,14,16 22:24 23:2	June 4:22 18:12,13,14 26:9,10
hear 25:17 27:1	impact 20:25	install 11:13	jurisdictions 17:6
heard 26:4	importance 8:23	installation 17:17	Justin 13:20 22:6,12, 15 23:5 24:10 25:2 28:2
hearing 13:2	important 4:21 27:4 29:3	installer 11:2 20:3,8, 9,10 24:21,25 25:5	<hr/> K <hr/>
helpful 14:8 25:1	imposed 21:12	installer's 15:10 20:11	Karen 12:24
helps 15:25	included 19:2,3	installers 5:9 9:1,2,5, 6,8,13 10:17,18,24 11:10,17,24 12:3,5,6 15:9 19:7 20:2,7 21:5 24:25	keeping 18:19
higher 27:19	including 5:15 17:22	insurance 7:16	kicking 28:25
highest 4:12	increase 5:7 18:15,22 19:5,13,20,25 20:4 21:7,11 22:4 29:4	interested 30:13	kind 4:9 23:25 24:7 27:9,10
hire 6:6 28:20	increased 4:11 21:16	interesting 27:1	<hr/> L <hr/>
hired 28:19	increases 13:4,6 18:21,23 19:1,6 20:20 21:8	internal 21:8	labor 10:24,25
hit 5:20,21 10:9	indicating 24:24	introduced 16:18	
hitting 5:8	indicative 15:21		
hold 18:20	indistinguishable 27:14		
home 11:2 14:4,8,17, 20 17:16 19:7,11,12 20:2,7 21:1,9 22:4 24:13			
homes 5:17 6:9 8:18 9:8,10,11 10:5,6 11:11,12,13 14:12,16			

large 21:7	make 6:22 8:1,3 10:1 15:23 22:25 23:16	Missouri 4:3 5:13 7:7 8:16 15:6 17:8,19 19:13 22:20	officer 30:3
largest 17:9,13	makes 10:8	mobile 25:22	older 26:24,25
law 17:2,8 18:2	making 9:6 16:14	modernized 21:20	on-site 15:4
laws 9:25	manager 8:18 13:21 16:20 22:16	modular 13:1,24 14:5,7,17,18,21,24 15:5 19:15,17,22,23 21:3,9 22:17 24:19 27:4,6,11 29:3	online 15:11
learn 11:4	managers 5:5	money 6:1,22 23:20, 25 24:2	open 16:12
Lebanon 8:18	mandate 20:16	monumental 22:8	operate 18:5 28:23
legal 23:12,13	manufactured 4:3 5:16 7:7,18,21 8:17 9:8 11:2,23 12:25 13:24 14:4,7,8,12,16, 20 15:2,4 17:11,16 18:3 19:7,11 20:2,7,24 21:1,9 22:3,14,16 24:18 27:14 29:2	move 12:22	operated 13:13
license 5:18 13:5 20:3,8,9,12,14 25:1,5, 6	manufacturer 17:8, 12	moved 25:23	operates 13:8 18:18
licensed 5:14 9:5,6 11:11,16 15:9 20:10	manufacturers 15:12 19:6,11,16,22 21:2,3	moving 26:20	operating 28:16,17
licenses 15:12 24:22	manufacturers' 14:25	multiple 11:10	opportunity 6:6
licensing 9:9 11:13	manufacturing 19:19	<hr/> N <hr/>	opposed 9:5
limited-use 20:8,9 24:21,25	market 9:8,11 10:9 24:13,15	necessarily 11:7 23:3	option 25:7
limits 9:23 10:2	markets 10:7	needed 5:6	order 29:1
living 18:21	match 20:22	Needless 16:7	outcome 30:13
loans 8:2,3	matter 12:2 23:12	news 27:16	overdue 13:14 19:1 21:8
local 10:1	maximum 6:14	normal 18:24	oversees 15:1,8
locations 23:3	meet 18:25 24:4 28:24	not-permanent 14:11	<hr/> P <hr/>
long 5:21 6:24 19:1 21:8 25:3	meeting 28:5	note 17:23	paid 19:6,7 20:19
longer 4:25 24:17	mention 10:16	number 4:18 5:20 15:20,21,24 20:18 26:4,6,21,23 28:18	pandemic 5:24
looked 28:5	mentioned 9:17 22:3 23:7	numbers 4:9,21 27:2	paper 6:17
lose 5:10	met 28:1	<hr/> O <hr/>	part 10:3 24:16
losing 5:10 9:12	microphone 25:17	occurred 26:3	parties 30:9,12
lot 4:16 5:4 6:8,20 7:25 8:5 9:7,24 10:1,5, 9 11:5,21 15:14 26:13 28:9	mind 7:2	offering 20:13	partners 17:15
lots 15:13	mission 29:1	office 16:8 27:9 28:17,19	passed 12:11
low 6:3 15:20			past 7:13 23:21
<hr/> M <hr/>			pay 12:3 19:11,16,22 20:2,7 21:2,4,5 27:22
made 15:10 18:9			paying 12:14
majority 27:12			payments 17:15,25
			pays 12:2,4 18:3
			people 5:18 11:6,18, 21 26:24 29:2

percent 4:15	primarily 10:4	quality 26:21	regulatory 11:16 22:16
percentage 21:7	primary 21:10 25:5,6	question 10:14	related 30:8
performs 15:3 16:19	prior 7:17 9:18	questions 7:1 12:16 13:21 21:22,23	relative 30:11
period 5:6	procedure 15:11	quote 21:11,15	relieved 28:9
permanent 14:11,12	proceedings 30:4,10		remove 11:11
person 6:6,7 16:22,23 20:9 28:20	process 16:5 25:6,25	<hr/> R <hr/>	renewal 19:23
personally 25:24	production 19:24	rainy 24:7	report 13:18
perspective 28:22	program 13:1,4,10, 13,25 14:25 15:3,8,10, 12,15,17,18 16:6,10, 20 17:10,15 18:4,5,18, 20 19:4,13,19,24 20:4, 17 21:6,10,12,20 22:17,19,21 24:1,2,16, 17 25:20 28:23	raised 16:2	reporter 22:11 30:3
physically 16:15	program's 13:7,21 14:3 17:1,3,9,13,24 18:8,11 20:22 21:18	raising 19:9 29:7	represent 12:25 22:8
pick 22:4	programs 19:19 24:12 26:14	rate 26:4,15	required 19:16 26:24
place 15:22 16:2 29:4	Promulgation 20:21	realize 4:24	requires 17:2 18:2 19:10,22 20:1,6
plan 11:19 19:24	proposal 13:3	reason 10:20 27:20	rescinded 24:21
plans 14:25 15:3	proposals 8:25	receive 6:1	rescinds 13:5
plenty 11:12	proposed 16:25 20:5, 21 21:16	received 4:7,20 17:11	rescission 20:5
plethora 11:14	proposes 19:4,9,13, 19,24 20:4	receives 15:15 17:19, 25	research 19:2 20:12
podium 21:25	provide 13:17 16:25 24:2 29:2	recently 4:8 19:3	residential 14:19 27:8
point 8:6 26:12 27:15 29:6,7	PSC 19:18 21:8	reclassifications 18:22	resources 13:9 21:19
points 28:14	Public 5:2,25 8:21 25:25 28:7	recommendation 21:11	respect 22:6
poorest 5:9	purposes 14:20	record 29:9	respond 25:14
position 11:7 16:12, 21 18:21 22:21 28:21	put 4:18	recreational 24:15	responsibility 4:17 6:21
possibly 6:5 9:4 27:21	putting 9:4 25:22	red 26:19	responsible 12:14
practical 12:1 23:14		reduced 30:6	restricted 10:3
predict 23:11,18	<hr/> Q <hr/>	reflect 21:20	result 25:21
predictably 18:24	quadrant 16:11	regard 5:1 27:25	resulted 15:13
preemption 9:25	quadrants 16:10	registration 17:9	retailers 5:12,13,15 26:21
prefabricated 14:9, 21		Regular 22:15	retire 11:19
Preface 8:20		regulate 14:24	retirees 28:3
premature 6:3		regulated 13:23	revenue 4:10,11 24:17
preowned 24:13		regulates 17:21	revenues 13:10 18:8, 24 20:20,21,22 23:17 24:4 28:24
present 26:14		regulating 24:15	
president 8:15		regulations 10:1 14:5 20:16	

<p>road 29:1</p> <p>room 25:18</p> <p>roughly 26:23</p> <p>rule 19:21 20:22 24:20</p> <p>rule's 25:7</p> <p>rulemaking 13:3,18 14:6 15:11 17:2,23 19:2,4 21:17</p> <p>rules 14:6 25:3</p> <p>running 5:18</p> <p>runs 18:12</p> <p>rural-based 10:4</p> <p>RVS 24:16</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>SAA 17:15,20,24</p> <p>SAAS 17:18</p> <p>safety 14:15</p> <p>salaries 18:22</p> <p>sales 7:21 22:4</p> <p>scattered 4:8 15:6</p> <p>seal 19:17</p> <p>seals 15:1</p> <p>secondary 9:10</p> <p>seed 24:2</p> <p>seldom 24:22</p> <p>selling 5:17 10:7</p> <p>sensitive 21:6</p> <p>separate 14:5</p> <p>serve 10:9</p> <p>service 5:3,25 8:21 9:3 25:25 28:7 29:2</p> <p>session 27:4</p> <p>set 11:11 23:25 25:4,8</p> <p>sets 17:8</p>	<p>setting 17:5</p> <p>shared 20:25</p> <p>shares 17:5</p> <p>Shelley 30:2,17</p> <p>shoestring 28:18</p> <p>short 16:20 22:19</p> <p>shortage 9:2,14 10:17,25 24:24 25:1</p> <p>shortages 10:24</p> <p>show 6:7</p> <p>showing 15:1 22:9</p> <p>shrunk 5:19</p> <p>sic 16:20</p> <p>side 5:17 11:16</p> <p>sides 11:15</p> <p>significant 4:9</p> <p>similar 20:13</p> <p>site 9:22</p> <p>site-built 10:6</p> <p>situation 17:1</p> <p>size 14:18</p> <p>smaller 17:22</p> <p>Smith 8:14,15 10:13, 15,19,22 11:25 12:6, 10,13,17,19 13:20 16:18 21:21,25 22:6, 12,15 23:5 24:10,23, 24 25:2</p> <p>sold 19:12</p> <p>sounds 27:24</p> <p>source 17:10,13</p> <p>sources 24:17</p> <p>southwest 22:20</p> <p>speak 9:16 12:21</p> <p>Speaking 16:8</p> <p>specifics 16:24</p>	<p>speed 23:24</p> <p>spend 6:22</p> <p>square 14:9</p> <p>stabilize 13:7</p> <p>staff 12:22,25 19:9 20:19 25:10,13 28:13</p> <p>staffing 21:19</p> <p>standard 14:16 27:6</p> <p>standards 10:5 17:16</p> <p>start 24:1</p> <p>started 16:22 24:1 25:20 28:20</p> <p>state 5:13 6:4 10:3 16:9,10,16 17:2,14 18:2 20:13 23:3 24:19</p> <p>stated 13:4 15:19 21:21 24:4</p> <p>statement 24:23</p> <p>states 20:12 25:22</p> <p>statutory 28:24</p> <p>steadily 18:11</p> <p>store 26:22</p> <p>streamline 20:16</p> <p>street 5:15</p> <p>stress 28:16</p> <p>strictly 27:11</p> <p>stronger 10:5</p> <p>structure 14:9</p> <p>struggles 9:24</p> <p>stuff 9:10,11</p> <p>succession 11:19</p> <p>sufficient 17:3 21:19</p> <p>suggested 15:22 16:13</p> <p>summarize 14:3</p> <p>supervision 20:11</p>	<p>supply 13:17</p> <p>support 25:24</p> <p>sustainability 11:15</p> <p>system 15:21</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>takes 6:20</p> <p>taking 16:1</p> <p>talked 28:2,15</p> <p>talking 6:4</p> <p>term 24:8</p> <p>testimony 13:2 30:5</p> <p>thereto 30:12</p> <p>thing 8:24 9:15 26:19 28:1</p> <p>things 4:20 5:23 7:24 9:20 23:25 25:20 28:6</p> <p>Thomas 4:2</p> <p>thousand 17:20 27:23</p> <p>tight 18:18</p> <p>time 5:6 8:6 16:20 17:4 18:5 19:3 24:14 25:3,23 26:13</p> <p>times 6:21 11:5</p> <p>tires 27:12</p> <p>today 7:11 13:2,20 16:22 26:22 27:15 28:20</p> <p>Tom 9:16</p> <p>totally 23:23</p> <p>trade 9:1</p> <p>train 11:21</p> <p>training 15:10</p> <p>trains 15:9</p> <p>transcript 30:4,9</p> <p>transportable 14:14,</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

21	view 8:21	
transported 14:23		
travel 22:24	<hr/> W <hr/>	
traverse 16:16	wanted 26:25	
tremendous 26:21	wastewater 13:23	
trend 4:10 7:22 13:11	water 13:23	
truck 14:23	wheels 14:13,22 27:12	
typewriting 30:7	WOODRUFF 4:4 7:1, 4,9,12,15,19 8:1,10 10:12,14,16,20 11:22 12:1,8,12,15,18,20 21:23 22:2,10,13 23:1, 6,13,19 24:7,20 25:9, 12,16 28:11 29:5	
typically 15:15 20:19	word 28:13	
<hr/> U <hr/>	work 8:21 11:8 14:3 16:22 20:10	
U.S. 14:14	worked 5:2	
Uh-huh 11:25	working 15:22	
understand 23:24 24:11	wrote 25:24	
understanding 23:2	<hr/> Y <hr/>	
understood 28:4	year 4:7 5:23,24,25 13:11,12,16 15:6,7,9, 13,17 17:10 18:4,5,7, 12 27:18,19,23	
unfilled 28:21	year-end 26:5	
unfunded 22:20	years 4:13 5:3 6:20 7:14,17 21:18 22:9 23:21 24:11,12 26:17, 19 27:22 28:18	
unit 14:5,10,18,21 19:16,17,18,22,23 21:3 24:16	young 11:21	
United 25:21	<hr/> Z <hr/>	
units 5:20 13:1,25 14:7,24 15:1,5 21:9 22:17 24:19 27:5,11 29:3	zoning 9:21 10:8	
update 13:17		
updated 21:17		
Urban 14:15		
utilities 13:24 14:1 18:1 26:2		
<hr/> V <hr/>		
vehicle 24:15		
versus 9:17		