# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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

## STAFF COMMENTS TO PROPOSED AMENDMENT

**COMES NOW** the Manager of the Manufactured Housing and Modular Units Program of the Missouri Public Service Commission ("Manager"), through counsel, and states:

- 1. Staff supports the proposed amendments to 20 CSR 4240-120.140(1) and (2), 20 CSR 4240-123.030(3)(B), 20 CSR 4240-123.040(11)(A), and 20 CSR 4240-125.040(1)(A), and the proposed rescission of 20 CSR 4240-125.050(1), published in the Missouri Register on September 1, 2021. The proposed amendments increase fees collected by the Manufactured Housing and Modular Units Program ("Program") in order to keep the Program on an adequate financial footing and ensure that the Commission meets its statutory requirement that fees cover the costs of Program administration.
- 2. Commission Rules 20 CSR 4240-120.140(1) and (2) require manufactured home manufacturers to pay an inspection fee of \$30 for each manufactured home delivered to or sold to a Missouri dealer. The proposed amendment increases this fee to \$75.
- 3. Commission Rule 20 CSR 4240-123.030(3)(B) requires modular unit manufacturers to pay a fee of \$110 for each modular unit seal. The proposed amendment increases this fee to \$220.

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<sup>&</sup>lt;sup>1</sup> Missouri Register, Vol. 46, No. 17, P. 1624 - 1632 (Sept. 1, 2021).

- 4. Commission Rule 20 CSR 4240-123.040(11)(A) requires modular unit manufacturers to pay an annual fee of \$75 for each modular unit plan in production. The proposed amendment increases this fee to \$150.
- 5. Commission Rule 20 CSR 4240-125.040(1)(A) requires manufactured home installers to pay an annual fee of \$150 for an installer's license. The proposed amendment increases this fee to \$225.
- 6. Commission Rule 20 CSR 4240-125.050(1) requires manufactured home installers to pay an annual fee of \$150 for a limited use installer's license. The rule is unnecessary because no one has applied for this license for years.

**WHEREFORE**, Staff files these comments for the Commission's consideration and information.

Respectfully Submitted,

### <u>/s/ Karen E. Bretz</u>

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#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via e-mail on all parties of record to this case on this 1st day of October, 2021.

#### /s/ Karen Bretz