

Re: Item No. 14 - Initial SOS Filing 20 CSR 4240-125.040

Manufactured housing is at the forefront of solving the current extreme affordable housing crisis, but unnecessary regulation hinders the industry from doing just that. Held to rigorous standards at both the Federal and State level, manufactured homes are the most regulated form of housing in today's market. In 2025, 1768 manufactured homes were shipped into Missouri, with the MO Public Service Commission only receiving 12 consumer complaints. That's an over **99% satisfaction rate** with our homeowners. **Gifford Homes, Inc.** supports fair, clear and accurate enforcement of the federal standards with proven success. The following are some highlights of the proposed rules which the industry takes issue and seeks commission consideration.

Proposed Amendments:

(2) Installer Responsibilities and Limits.

4. The addition of fuel gas supply.

Fuel and gas supply connection experts have become increasingly specialized to the point where even gas companies aren't willing to do hook-ups. This is a highly skilled task with an enormous amount of risk and liability. We, as an industry, are currently facing an alarming shortage of certified installers because of the large responsibility they already take on. MMHA does not feel it is an appropriate ask to put such a hazardous burden on installers, nor would homeowners want someone who isn't knowledgeable being tasked with this responsibility.

10. Assuring all exterior and interior close-up work is completed.

This statement is too broad and undefined. What is considered "close-up work"? Many items could be categorized into this ambiguous, umbrella statement that would be strictly cosmetic and wouldn't fall under the authority of the MO Public Service Commission's inspections. The installers should be focused on the responsibility of installing the home on the property and ensuring the home is structurally sound by following the manufacturer's installation manual. The installers should not be responsible for making the home "pretty" via trim work, drywall work, cosmetic work, etc.

Sincerely,

Caitlin Gifford

Vice-President

Gifford Homes, Inc.