

KOEHLER HOME SALES

Shane L. Harkins *
Owner

* Becky Harkins

Docket Sheet MX-2026-0286

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

Manufactured housing is at the forefront of addressing today's affordable housing crisis. However, unnecessary regulatory burdens continue to hinder the industry's ability to provide safe, quality, and affordable housing options to Missouri families.

Manufactured homes are already subject to rigorous oversight at both the federal and state levels, making them one of the most heavily regulated forms of housing available. In 2025, 1,768 manufactured homes were shipped into Missouri, while the Missouri Public Service Commission received only 12 consumer complaints. This represents a homeowner satisfaction rate of more than 99 percent and demonstrates the effectiveness of the current regulatory framework.

Koehler Home Sales supports fair, consistent, and accurate enforcement of federal standards that have a proven record of success. However, we have concerns regarding several provisions within the proposed amendments and respectfully request the Commission's consideration of the following issues:

Proposed Amendments

(2) Installer Responsibilities and Limits

4. The addition of fuel gas supply.

While the federal installation standards do address fuel gas systems, the guidance provided to installers is limited to a few general requirements regarding gas pressure, crossover connections, quick-disconnect devices, and leak testing. If the Missouri Public Service Commission intends to hold manufactured home installers responsible for fuel gas supply connections, there needs to be far more guidance, training, and certification requirements than the few bullet points currently provided in the installation manual.

Connecting natural gas or propane is not a simple installation task. It is specialized work that carries significant safety risks and is typically performed by licensed plumbers or certified gas fitters who have completed extensive training and testing. These professionals are specifically trained to understand fuel gas systems, code requirements, pressure regulation, leak detection, and the many safety considerations involved in connecting gas to a home and its appliances.

Manufactured home installers already carry substantial responsibility for the proper installation of homes and are facing a growing shortage of qualified workers. Asking installers to assume responsibility for fuel gas connections without the same level of training, licensing, and expertise required of gas professionals places an unreasonable burden on the industry and increases potential liability. More importantly, it raises concerns about homeowner safety.

If fuel gas supply connections are to become an installer responsibility, there should be comprehensive training standards, certification requirements, and clear guidance comparable to what is required of licensed plumbers and certified gas fitters. Otherwise, fuel gas connections should remain the responsibility of qualified professionals who are specifically trained and licensed to perform this work safely.

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

This requirement is very broad and does not clearly define what is meant by "exterior and interior close-up work." As written, it could be interpreted to include a wide variety of items, many of which may be purely cosmetic in nature and outside the scope of the Missouri Public Service Commission's inspection authority.

For example, does this include touch-up painting, trim adjustments, drywall blemishes, flooring transitions, or other finish work? Without a clear definition, installers may be held responsible for items that are unrelated to the installation standards that the Commission is tasked with enforcing.

We believe it would be beneficial for both the industry and the Commission to more clearly define what work falls under this requirement. Providing specific parameters would eliminate confusion, promote consistent enforcement, and help ensure that installers are being held accountable for the items that directly relate to the proper installation and safety of the home.

Sincerely,

A handwritten signature in black ink that reads "Shane L. Harkins". The signature is written in a cursive, flowing style.

Shane L. Harkins

Owner

Koehler Home Sales

Straight-Cut Set-Up Specialists