

From: [Smith, Jamie](#)
To: [Consumer Services](#)
Subject: Docket Sheet MX-2026-0286 Public Comments
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Docket Sheet MX-2026-0286

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. Clayton Homes of Lebanon supports fair, clear and accurate enforcement of the federal standards with proven success.

While being at the forefront of helping solve a housing crisis, we remain the most regulated form of housing as it is, by far.

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. Clayton Homes of Lebanon does not believe 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. For example, 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.

Anything that starts the venture into the realm of possibility of cosmetic items being

regulated is something the industry will strongly oppose as that is completely subjective in nature.

One of the largest struggles faced in our industry as it stands is lack of contractors and installers. Many of which are competent but do not wish to accept the already stringent responsibilities placed upon them, in the PSC licensing requirements, and being responsible for many tasks they cannot complete as it is. Adding further requirements will do nothing but heighten the bar for entry into this field and increase further barriers to new contractors joining as installers, of which is a large fear of retirement happening, without positions being replaced as it sits. The burden of licensing should be lessened to increase involvement, not heightened.

We sit as a incredible solution to housing needs, but cannot afford further rising costs. Costs to purchase homes in MO of similar quality already exceed those of surrounding states by thousands of dollars as is.

Sincerely,

Jamie Smith

General Manager

[REDACTED]

Jamie Smith



[REDACTED]

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