

From: [Jared Ray](#)
To: [Consumer Services](#)
Subject: Comments on Proposed Amendments to 20 CSR 4240-125.040
Date: Tuesday, June 30, 2026 1:03:50 PM

Docket Sheet
MX-2026-0286

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

Manufactured housing continues to be one of the best solutions to Missouri's affordable housing challenges. As an industry, we fully support regulations that protect homeowners and ensure homes are installed safely and correctly. At the same time, it's equally important that new regulations are practical and don't create unnecessary burdens that ultimately make affordable housing more difficult to deliver.

Manufactured homes are already subject to extensive federal and state oversight, making them one of the most heavily regulated housing products available. That system has proven to be effective. During 2025, 1,768 manufactured homes were shipped into Missouri, while the Missouri Public Service Commission received only 12 consumer complaints. Those numbers demonstrate an overwhelming level of homeowner satisfaction and show that the existing regulatory framework is working.

Proposed Amendments

20 CSR 4240-125.040(2)(D)4 – Addition of Fuel Gas Supply

The proposed requirement placing responsibility for fuel gas supply connections on installers raises significant concerns. Gas line connections require specialized training and carry substantial safety risks and liability. In fact, many local gas providers have moved away from performing these connections because of the expertise and responsibility involved.

Our industry is already experiencing a shortage of qualified, certified installers. Expanding their responsibilities to include fuel gas connections would increase liability while making it even more difficult to recruit and retain installers. More importantly, homeowners are better served when this work is performed by professionals whose primary expertise is gas service. We do not believe shifting this responsibility to manufactured home installers improves safety or benefits Missouri consumers.

20 CSR 4240-125.040(2)(D)10 – Completion of Exterior and Interior Close-Up Work

We are also concerned that this language is overly broad and lacks sufficient definition. As written, "all exterior and interior close-up work" could be interpreted to include numerous cosmetic or non-safety-related items that fall outside the scope of the Missouri Public Service Commission's inspection authority.

Without clearer parameters, the requirement could lead to inconsistent interpretation and enforcement across the industry. We encourage the Commission to provide more specific language so installers clearly understand their responsibilities while ensuring inspections remain focused on legitimate installation, health, and safety standards.

Thank you for your consideration of these comments and for your continued efforts to support consumer protection while maintaining a practical regulatory environment for manufactured housing in Missouri.

Sincerely,



Jared Ray

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