

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Proposed	)	
Amendments of the Commission's Rules	)	<u>File No. MX-2026-0286</u>
Relating to Manufactured Housing	)	

STAFF SUPPLEMENTAL COMMENTS

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") hereby submits its *Staff Supplemental Comments*, and states as follows:

1. From June 10, 2026, through July 6, 2026, the Commission and Staff received numerous comments from various parties in regard to the proposed amendments to the Commission's manufactured housing rules. The amended manufactured housing rules included the following:

- 20 CSR 4240-120.011 Definitions
- 20 CSR 4240-120.110 Complaints and Review of Manager Action(s)
- 20 CSR 4240-123.010 Definitions
- 20 CSR 4240-123.020 Administration and Enforcement
- 20 CSR 4240-123.030 Seals
- 20 CSR 4240-123.040 Approval of Manufacturing Programs
- 20 CSR 4240-123.090 Complaints and Review of Manager's Action(s)
- 20 CSR 4240-124.010 Definitions
- 20 CSR 4240-124.020 Administration and Enforcement
- 20 CSR 4240-124.060 Complaints
- 20 CSR 4240-125.010 Definitions
- 20 CSR 4240-125.040 Manufactured Home Installer License
- 20 CSR 4240-125.060 Licensing
- 20 CSR 4240-126.010 Definitions
- 20 CSR 4240-126.020 Consumer Recovery Fund
- 20 CSR 4240-127.010 Definitions.

2. On June 30, 2026, Staff filed its *Staff Comments* in Support of the amendments.

3. Staff reviewed the comments submitted by the parties and determined that there were two consistent comments in regard to the amendment of 20 CSR 4240-125.040. These comments are as follows:

20 CSR 4240-125.040

(2) Installer Responsibilities and Limits

(A) Work covered by an installer licensee shall include but not be limited to the following:

4. Providing plumbing, electrical, and mechanical cross-over, **fuel gas supply**, appliance and fixture connections of and to the manufactured home, as permitted by these requirements”

Commenters state that “fuel and gas supply connection experts have become increasingly specialized to the point where gas companies are not willing to do hook-ups.” They state that as an industry, they are facing a shortage of certified installers and do not believe “it is an appropriate ask to put such a hazardous burden on installers.” Homeowners would also not want someone who is not knowledgeable to be tasked with this responsibility. 26 Commenters want this additional language removed.

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

Commenters state that this statement is too broad and undefined, and argue that “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.” 25 Commenters want this added section removed.

4. On July 1, 2026, Staff and members of the Executive Staff had an internal meeting to discuss the parties comments addressed above and determined that these specific changes will be removed from this rulemaking. However, these may be considered during a future working docket to develop a consensus on needed language.

5. The proposed amendments are essential to the health, safety, and welfare of Missouri residents by ensuring that the Commission, stakeholders, consumers, etc. have the correct citations and locations of commission rules.

WHEREFORE, Staff respectfully submits these supplemental comments for the Commission's consideration and supports the proposed amendments of the Commission's manufactured rules mentioned above in Paragraph One.

Respectfully submitted,

/s/ J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 8th day of July, 2026.

/s/ J. Scott Stacey