

Denny Hoskins

Secretary of State / Administrative Rules

RULE TRANSMITTAL

Administrative Rules Stamp

JCAR Stamp

Rule Number 20 CSR 4240-125.040

Use a SEPARATE rule transmittal sheet for EACH individual rulemaking.

Name of person(s) Administrative Rules can contact with questions about this rule:

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TYPE OF RULEMAKING ACTION TO BE TAKEN

☐ Emergency Rulemaking > ☐ Rule ☐ Amendment ☐ Rescission ☐ Termination

Effective date for the emergency _____

Proposed Rulemaking > Rule ☐ Amendment ☐ Rescission

☐ Rule Action Notice

☐ In Addition

☐ Rule Under Consideration

☐ Request for Non-Substantive Change

☐ Statement of Actual Cost

☒ Order of Rulemaking > ☐ Withdrawal ☐ Adoption ☒ Amendment ☐ Rescission

Effective date for the order _____

☒ Statutory 30 days OR Specific date _____

Does the Order of Rulemaking contain changes to the rule text? ☐ NO

☒ YES—LIST THE SECTIONS/SUBSECTIONS WITH CHANGES:

Paragraphs (2)(A)4., (2)(A)8., (2)(A)9., and (2)(A)10.



Missouri Public Service Commission

MAIDA J. COLEMAN
Commissioner

KAYLA HAHN
Chair

JOHN P. MITCHELL
Commissioner

GLEN KOLKMEYER
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VACANT
Commissioner

Sarah Schappe
Director
Joint Committee on Administration Rules
State Capitol, Room B8A
Jefferson City, Missouri 65101

Re: 20 CSR 4240-125.040 Manufactured Home Installer License

Dear Director Schappe,

CERTIFICATION OF ADMINISTRATIVE RULE

I do hereby certify that the attached is an accurate and complete copy of the order of rulemaking lawfully submitted by the Missouri Public Service Commission.

Statutory Authority: *section 700.692, RSMo 2016*

If there are any questions regarding the content of this order of rulemaking, please contact:

Nancy Dippell, Secretary
Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102
(573) 751-8518
Nancy.Dippell@psc.mo.gov

A handwritten signature in black ink that reads "Nancy Dippell".

Nancy Dippell
Secretary to the Commission



STATE CAPITOL
201 W. CAPITOL AVENUE, ROOM 216
JEFFERSON CITY, MISSOURI 65101



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Mike Kehoe

GOVERNOR
STATE OF MISSOURI

August 5, 2026

Kayla Hahn, Chair
Missouri Public Service Commission
P O Box 360
Jefferson City MO 65102

Dear Ms. Hahn:

Our office has received the Final Order of rulemakings for the following regulations:

- **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

Executive Order 25-13 requires this office's approval before state agencies release proposed regulations for notice and comment, amend existing regulations, or adopt new regulations. After our review, we approve submission of the rule and the regulatory impact report (if required) to JCAR and the Secretary of State.

Sincerely,

A handwritten signature in blue ink that reads "Lowell Pearson".

Lowell Pearson
General Counsel

Title 20 – DEPARTMENT OF COMMERCE AND INSURANCE
Division 4240 – Public Service Commission
Chapter 125 – Manufactured Home Installers

ORDER OF RULEMAKING

By the authority vested in the Public Service Commission under sections 386.250, 386.310, and 700.040, RSMo 2016, the commission amends a rule as follows:

20 CSR 4240-125.040 is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 1, 2026 (51 MoReg 714-715). Those sections with changes are reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended June 30, 2026, and the commission held a public hearing on the proposed amendment on July 9, 2026. The commission received thirty (30) written comments from members of the Manufactured Housing Association that were supportive of most of the proposed amendments but were in opposition to two of the proposed amendments. The commission also received one (1) comment at the hearing from its staff recommending the deletion of the two objected to proposed amendments.

COMMENT #1: Approximately thirty (30) commenters (including Doug Sutton of Mobile Home Transport; Cody Shaver of Style Crest, Inc.; David Apple of Clayton Homes, Missouri; Jared Ray of autoMHatic Financial; Jamie Smith of Clayton Homes of Lebanon; Nathan Grant of Clayton Homes, Joplin; Blake Ware of Clayton Homes Joplin; Jeri Cobb of Cobb Homes; Nathan Haar of Endeavor Communities; Robert Jordan of Value Homes, Inc.; Phil Parker of Parker Properties; Haley Parker of Cedar Creek Homes; J.L. Jones of Ramsey Jones Homes, Inc.; Gavin Richmond of Monty's Manufactured Homes; Brian Evans of Champion Homes; Jeramie Swanson of True Blue LLC; John and Kim Hefner of Hefner's Mobile Home Service, Inc.; Jeremy Miles of Miles Mobile Home Moving LLC; Eleanor Porter of Swan Lake Estates, LLC; V. Shane Farr of BonnaVilla Homes; Haley Parker of Cedar Creek Homes; Greg McDonald of Arco Distributing; Shane Harkins of Koehler Home Sales; John Kennedy of Sears Mfg Homes, Inc.; Dominic Durbin of Arco Distributing; Caitlin Gifford of Gifford Homes, Inc.; Karin Burton of Missouri Manufactured Housing Association; Timothy Donaldson of Clayton Homes; and Karin Burton of Missouri Manufactured Housing Association), mostly members of the Missouri Manufactured Housing Association, commented

that the rule should not be amended to include the addition of “fuel gas supply” to the work covered by an installer licensee in paragraph (2)(A)4. The commenters stated that connection experts have become increasingly specialized to the point where gas companies are not willing to do hook-ups.” They stated that as an industry, they are facing a shortage of certified installers and do not believe it is appropriate to put such a hazardous burden on installers. The commenters also said that homeowners would not want someone who is not knowledgeable to be tasked with this responsibility. All of the commenters requested this proposed amendment to paragraph (2)(A)4. not be made.

RESPONSE AND EXPLANATION OF CHANGE: The commission thanks the members of the Missouri Manufactured Housing Association and other interested commenters for their comments. The commission agrees that this change should not be made without further discussion with the association and its members. Therefore, the commission will withdraw the added language to paragraph (2)(A)4.

COMMENT #2: Approximately twenty-nine (29) commenters (including Doug Sutton of Mobile Home Transport; Cody Shaver of Style Crest, Inc.; David Apple of Clayton Homes, Missouri; Jared Ray of autoMHatic Financial; Jamie Smith of Clayton Homes of Lebanon; Nathan Grant of Clayton Homes, Joplin; Blake Ware of Clayton Homes Joplin; Jeri Cobb of Cobb Homes; Nathan Haar of Endeavor Communities; Robert Jordan of Value Homes, Inc.; Phil Parker of Parker Properties; Haley Parker of Cedar Creek Homes; J.L. Jones of Ramsey Jones Homes, Inc.; Gavin Richmond of Monty’s Manufactured Homes; Brian Evans of Champion Homes; Jeramie Swanson of True Blue LLC; John and Kim Hefner of Hefner’s Mobile Home Service, Inc.; Jeremy Miles of Miles Mobile Home Moving LLC; Eleanor Porter of Swan Lake Estates, LLC; V. Shane Farr of BonnaVilla Homes; Haley Parker of Cedar Creek Homes; Greg McDonald of Arco Distributing; Shane Harkins of Koehler Home Sales; John Kennedy of Sears Mfg Homes, Inc.; Dominic Durbin of Arco Distributing; Caitlin Gifford of Gifford Homes, Inc.; Karin Burton of Missouri Manufactured Housing Association; and Karin Burton of Missouri Manufactured Housing Association), mostly members of the Missouri Manufactured Housing Association, commented in opposition to the addition of paragraph (2)(A)10. which would have added to the installer licensee responsibilities the requirement of assuring all exterior and interior close-up work was completed. The commenters stated that this requirement is too broad and undefined and they argued 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.” All of the commenters requested new paragraph (2)(A)10. be deleted.

RESPONSE AND EXPLANATION OF CHANGES: The commission thanks the Missouri Manufactured Housing Association members and other interested commenters for their comments. The commission agrees that this change should not be made without further discussion with the association and its members. Therefore, the commission will withdraw the addition of new paragraph (2)(A)10. and the accompanying amendments that were made to paragraphs (2)(A)8. and (2)(A)9. because of the new paragraph.

COMMENT #3: J. Scott Stacey on behalf of the staff of the commission filed two (2) written comments and commented at the hearing in support of the proposed amendments with certain changes. Staff noted many of the proposed amendments are to update rules and statutory citations identified as needing correction during the commission's periodic rule review. Staff noted that other amendments were additions made to clarify or update requirements of dealers and installers. Staff further submitted a Supplemental Comment and commented at the hearing regarding to the same. Mr. Stacey stated that staff had reviewed the comments submitted by the parties and determined that there were two consistent comments that were in opposition to the proposed amendment of paragraph (2)(A)4. and the proposed addition of paragraph (2)(A)(10). Staff noted it had an internal meeting to discuss the parties' comments and determined that these specific changes should be removed from this rulemaking. Staff noted, however, that it wished to continue discussions with the Manufactured Housing Association regarding potentially incorporating similar changes as the result of a future working docket to develop a consensus on needed language.

RESPONSE AND EXPLANATION OF CHANGES: The commission thanks its staff for its work updating the manufactured housing rules. In response to the Manufactured Housing Association members' comments and the recommendation of staff, the commission will withdraw its proposed changes to paragraph (2)(A)4. and the addition of paragraph (2)(A)10.

20 CSR 4240-125.040 Manufactured Home Installer License

(2) Installer Responsibilities and Limits.

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

1. Installing manufactured home under-floor vapor retarder as required by the manufacturer's installation manual for proper ventilation and access;
2. Installing the support, anchorage against wind, and the structural connections and roof installation for manufactured homes;
3. Providing plumbing and electrical utility connections unless they are regulated by local jurisdictions;
4. Providing plumbing, electrical, and mechanical cross-over, appliance and fixture connections of and to the manufactured home, as permitted by these requirements;
5. Assuring that all appliance exhaust ducts are roughed in and terminations are complete when required;
6. Closing and securing all access panels and covers on or under the manufactured home;
7. Assuring all doors and windows are adjusted, secured in place, and operational;
8. Assuring all shipped loose flue vents and chimneys are installed, secured in place, and capped according to the manufacturer's installation manual; and

9. Where the installer also installs the skirting, complying with skirting requirements to ensure proper ventilation.