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To: Senator Michael Fagg, Chairman and Members of the Senate Utilities Committee

FROM: Martha Smith, Executive Director

DATE: February 12, 2025

RE: SB170 – Authorizing the state corporation commission to make recommendations regarding energy efficiency standards for buildings

Chairman Fagg and members of the Senate Utilities Committee, my name is Martha Smith and I am the Executive Director of the Kansas Manufactured Housing Association (KMHA). KMHA is a statewide trade association representing all facets of the manufactured and modular housing industries (manufacturers, retail centers, manufactured home community owners and operators, service and supplier companies, finance and insurance companies and transport companies). Thank you for allowing me the opportunity to provide KMHA's written comments opposing SB170.

SB170 give the state corporation commission new authority to recommend energy efficiency standards for residential structures. While the bill does not give the commission the authority to adopt or enforce the standard, the concern is that the recommendation will be taken as a signal for local units of government to adopt the standard without having the ability to research the impact it will have on new construction.

There are also concerns that many appraisers still rely on comparable sales ("comps"), which may not account for energy efficiency in similar homes in the area. If the appraisal does not take into account the energy efficient features, the home may not appraise at a higher value and might come with a higher interest rate and greater monthly payments.

In closing, KMHA is concerned that the passage of SB170 may send a signal to local governments to adopt higher energy conservation codes without being able to adequately research the impact on new home prices.

Thank you for the opportunity to provide comments on SB170.