



AMERICAN PUBLIC GAS ASSOCIATION

March 31, 2020

Hon. Dr. Benjamin S. Carson, Sr.
c/o Office of General Counsel, Regulations Division
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 10276, Washington, DC 20410-0001

Re: Manufactured Home Construction and Safety Standards, Docket # FR-6149-P-01

Dear Secretary Carson,

The American Public Gas Association (APGA) is the national association of municipally and publicly-owned local distribution systems. There are approximately 1,000 public gas systems serving more than 6 million customers in the United States. These public gas utilities are not-for-profit retail distribution entities that are owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that have natural gas distribution facilities. Public gas systems' primary focus is on providing safe, reliable, and affordable energy to their customers to be used for cooking, clothes drying, and space and water heating, as well as for various commercial and industrial applications.

APGA has reviewed the U.S. Department of Housing and Urban Development's (HUD's) proposed amendments to the Federal Manufactured Home Construction and Safety Standards. Considering that many of APGA's members provide energy to manufactured housing, we are grateful HUD has made safety a top priority. For this particular proceeding, we want to offer support of the comments submitted by the American Gas Association (AGA). As partners in the local distribution of natural gas, APGA and AGA have similar input. We strongly recommend HUD take into consideration the feedback from AGA, especially the suggestion to extend the carbon monoxide (CO) alarm requirements to all HUD-jurisdictional manufactured housing.

Again, APGA is appreciative of the opportunity to offer these comments. As appropriate, we look forward to working with HUD in continuing the mission of ensuring safe manufactured housing.

Respectfully submitted,

Dave Schryver
President & CEO
American Public Gas Association
201 Massachusetts Avenue, NE
Washington, DC 20002
(202) 464-0835
dschryver@apga.org