

October 18, 2023

The Honorable Charles Schumer
Senate Majority Leader
United States Senate
Washington, DC 20510

The Honorable Mitch McConnell
Senate Minority Leader
United States Senate
Washington, DC 20510

The Honorable Patty Murray
Chair, Committee on Appropriations
United States Senate
Washington, DC 20510

The Honorable Susan Collins
Vice Chair, Committee on Appropriations
United States Senate
Washington, DC 20510

Re: Oppose Rubio Amendment #1237 to H.R. 4366 (minibus appropriations bill)

Dear Majority Leader Schumer, Minority Leader McConnell, Chair Murray and Vice Chair Collins:

The undersigned organizations urge Senators to oppose Rubio Amendment #1237 “To prohibit the use of funds to implement the final rule regarding energy efficiency standards for certain subsidized housing.”

In May 2023, the U.S. Department of Housing and Urban Development (HUD) and the U.S. Department of Agriculture (USDA) released a “preliminary determination” to update the energy requirements for new federally supported homes. HUD and USDA [found](#) that adopting the proposed energy code, which the Rubio Amendment would cancel, saves an average of \$14,536 in energy bills over the life of a single-family home, and over \$5,000 in energy bills per multifamily unit compared to their current requirements. The bipartisan 2007 Energy Independence and Security Act (EISA) requires HUD and USDA to periodically update these requirements, but the agencies have failed to update them since 2015. In August, 160 organizations and thousands of individuals [submitted comments](#) to HUD and USDA in support of the proposed update.

Rubio #1237 would raise the total cost of living for families who are most sensitive to rising prices through higher and more volatile energy bills. Without the new energy standards, low-income households will unnecessarily endure decades of higher energy bills and homes that are less safe in the face of extreme heat and cold. Low-income households already [bear significant energy cost burdens](#) compared to higher income households, and this amendment will exacerbate these inequities.

The cost of the requirements is only [2%](#) of the average cost of a new home under their programs, paying for itself in less than 3 years on average. When amortized in a mortgage, these costs will generally be lower than the monthly energy savings, and will reduce the need for far more costly energy retrofits in the future.

For these reasons, the undersigned groups strongly oppose Rubio #1237 and urge you to vote no.

Sincerely,

American Council for an Energy Efficient Economy (ACEEE)
National Consumer Law Center (on behalf of its low-income clients)
National Association of State Energy Officials (NASEO)
Greenbank Associates
Southern Environmental Law Center
Enterprise Community Partners
Americans for Financial Reform
Minnesota Housing Partnership
Network for Oregon Affordable Housing (NOAH)
Housing Assistance Council (HAC)
Institute for Market Transformation (IMT)
Moscow Affordable Housing Trust
Fauquier Habitat for Humanity
Community Action Commission of Fayette County
come dream. come build. (cdcb)
National Association for Latino Community Asset Builders (NALCAB)
EPS Industry Alliance
New Buildings Institute (NBI)
North American Insulation Manufacturers Association
Insulation Contractors Association (ICAA)
Spray Polyurethane Foam Alliance
Cellulose Insulation Manufacturers Association
Structural Insulated Panel Association (SIPA)
Polyisocyanurate Insulation Manufacturers Association
California Efficiency + Demand Management Council
U.S. Green Building Council
Earthjustice
Southwest Energy Efficiency Project (SWEEP)
NRDC
350.org

RMI

Evergreen

Sierra Club

Rewiring America

Earth Advantage

Dream.Org

Elevate

New York Geothermal Energy Organization/NY-GEO

New Yorkers for Clean Power