



May 4, 2026

The Honorable Katie Stewart
Representative, Colorado 59
Via Email

Dear Representative Stewart,

We are writing to bring your attention to a significant problem that has been inadvertently created by well-intentioned legislation passed in 2023, HB23-1161. This bill updated standards for new appliances and fixtures sold in Colorado and took effect in 2026. The legislation is having a terribly negative impact on low-income mobile homeowners who can no longer source furnace and water heater replacements.

Our agencies share the goal of reducing the environmental footprint of our housing stock, which is why we operate our weatherization program, offer low-cost home improvement loans, use green building techniques in our new construction projects, and offer other energy savings programs.

Unfortunately, we find that the industry has not adapted to the new Colorado standard and this legislation is having a direct impact on the very people we serve - low-income homeowners and renters.

We are no longer able to source propane furnaces and water heaters for mobile homes that meet the new standards in parts of our territory. The only mobile home furnace option that currently meets the requirements will not be an option after July 2026 when the Energy Star standard changes. We are also unable to source any natural gas mobile home storage water heaters that meet the new requirements. Tankless water heater options are significantly more expensive and require costly annual maintenance that is not financially feasible for our low-income clients. Tankless options often cannot be installed in exterior mobile home closets, and they require a higher gas volume that usually triggers a whole house gas line upgrade.

If a tankless water heater cannot be installed, electric water heaters are the only option to meet the current requirements when a propane water heater needs to be replaced. These are much more expensive to install, requiring both an electrician and a plumber and often triggering a whole-house electrical upgrade. The cost of ongoing electrical use of electric resistance equipment is typically higher than gas and propane, increasing the monthly costs for our vulnerable clients.



Mobile home residents tend to have lower income than the population average and are most vulnerable to cost increases. The average income of clients in our Weatherization program is **less than \$30,000** annually. Approximately 100,000 Colorado households live in mobile homes and stand to be negatively affected by this new requirement.

The impacts of this legislation are damaging enough to our weatherization and home improvement programs, but the even greater risk is to those residents who aren't receiving assistance with their home improvements and are on their own to manage this impossible situation. Imagine being a mobile home resident, having your furnace go out in the dead of winter, and then being unable to replace it at all because there are no legal gas-fired options sold in the entire state of Colorado.

For the safety and financial security of the 100,000 Colorado households who live in mobile homes, we ask you to take immediate action to address this crisis in the making. We recommend the new standards be delayed until manufacturers can provide realistic and affordable options for mobile home furnaces and water heaters. Our Colorado Weatherization Agency Network is ready to assist with any additional information that may be helpful in addressing our concern.

Sincerely,

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