

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  
WE ACT for Environmental Justice  
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

The Passive House Network

New York Geothermal Energy Organization/NY-GEO

New Yorkers for Clean Power