Energy Technical Advisory Committee (TAC) – Comments

9th Edition (2026) Florida Building Code, Energy Conservation

Glitch – Consistency with Federal Standards

EN – Ch. C4 – Comment #1

From: Bereket Nigusse

Table C403.2.3(1)

TABLE C403.2.3(1)—ELECTRICALLY OPERATED UNITARY AIR CONDITIONERS AND CONDENSING UNITS—MINIMUM EFFICIENCY REQUIREMENTS[c]					
EQUIPMENT TYPE	**SIZE CATEGORY**	**HEADING SECTION TYPE**	**SUBCATEGORY OR RATING CONDITION**	**MINIMUM EFFICIENCY**	**TEST PROCEDURE[a]**
Air conditioners, air cooled	< 45,000 Btu/h[b]	All	Split system, three phase and applications outside US single phase[b]	~~14.0 SEER before 1/1/2023~~ 14.3 SEER2 ~~after 1/1/2023~~	~~AHRI 210/240—2017 before 1/1/2023~~ AHRI 210/240—2023 ~~after 1/1/2023~~
	≥ 45,000 Btu/h[b] and < 65,000 Btu/h[b]	All		~~14.0 SEER before 1/1/2023~~ 13.8 SEER2 ~~after 1/1/2023~~	
	< 65,000 Btu/h[b]	All	Split system, three phase and applications outside US single phase[b]	~~14.3~~ 13.4 SEER2	AHRI 210/240—2023
			Single package, three phase and applications outside US single phase[b]	~~13.8~~ 13.4 SEER2	
Space constrained, air cooled	≤ 30,000 Btu/h[b]	All	Split system, three phase and applications outside US single phase[b]	11.7 SEER2	AHRI 210/240—2023
			Single package, three phase and applications outside US single phase[b]	11.7 SEER2	
Small duct, high velocity, air cooled	< 65,000 Btu/h[b]	All	Split system, three phase and applications outside US single phase[b]	12. 0 SEER2	AHRI 210/240—2023

No change to the remaining text

Table C403.2.3(4)

TABLE C403.2.3(4)—WARM-AIR FURNACES AND COMBINATION WARM-AIR FURNACES/ AIR-CONDITIONING UNITS, WARM-AIR DUCT FURNACES AND UNIT HEATERS—MINIMUM EFFICIENCY REQUIREMENTS[g]								
DESCRIPTION	**FUEL**	**ELECTRIC POWER PHASE**	**APPLICATION LOCATION**	**HEATING CAPACITY (INPUT), Btu/h[b]**	**COMBO-UNIT COOLING CAPACITY, Btu/h**	**SUBTYPE**	**MINIMUM EFFICIENCY**	**TEST PROCEDURE[a]**
Warm-air furnace	Gas	1	Inside US	< 225,000	< 65,000	~~See Informative Appendix F, Table F-4[f]~~ Weatherized - 80.0 AFUE Non-weatherized - 81.0 AFUE		
Warm-air furnace	Gas	1	Inside US	< 225,000	≥ 65,000	Nonweatherized	80% AFUE	Appendix N[g]

						Weatherized	81% AFUE or 80% E_t[c]	Appendix N[g] ANSI Z21.47
Warm-air furnace	Gas	1	Outside US	< 225,000	All	Nonweatherized	80% AFUE	Appendix N[g]
						Weatherized	81% AFUE or 80% E_t[c]	Appendix N[g] ANSI Z21.47
Warm-air furnace	Gas	3	All	< 225,000	All	Nonweatherized	80% AFUE	Appendix N[g]
						Weatherized	81% AFUE or 80% E_t[c]	Appendix N[g] ANSI Z21.47
Warm-air furnace	Gas	All	All	≥ 225,000 and ≤ 400,000	All	All	81% E_t[c]	ANSI Z21.47
Warm-air furnace	Gas	All	Inside US	> 400,000	All	All	80% E_t[c] before 1/1/2023 81% E_t[c] after 1/1/2023	ANSI Z21.47
Warm-air furnace	Gas	All	Outside US	> 400,000	All	All	80% E_t[c] before 1/1/2023 81% E_t[c] after 1/1/2023	ANSI Z21.47 or ANSI Z83.8
Warm-air furnace	Oil	1	Inside US	< 225,000	< 65,000	~~See Informative Appendix F, Table F-4~~[f] Weatherized - 78.0 AFUE Non-weatherized – 83.0 AFUE		
Warm-air furnace	Oil	1	Inside US	< 225,000	≥ 65,000	Nonweatherized	83% AFUE	Appendix N[g]
						Weatherized	78% AFUE or 80% E_t[d]	Appendix N[g] Section 42 UL 727
Warm-air furnace	Oil	1	Outside US	< 225,000	All	Nonweatherized	83% AFUE	Appendix N[g]
						Weatherized	78% AFUE or 80% E_t[d]	Appendix N[g] Section 42 UL 727
Warm-air furnace	Oil	3	All	<225,000	All	Nonweatherized	83% AFUE	Appendix N[g]
						Weatherized	78% AFUE or 80% E_t[d]	Appendix N[g] Section 42 UL 727
Warm-air furnace	Oil	All	All	≥ 225,000	All	All	82% E_t[d]	Section 42 UL 727
Warm-air furnace	Electric	1	Inside US	< 225,000	< 65,000	~~See Informative Appendix F, Table F-4~~[f] 78% AFUE		
Warm-air furnace	Electric	1	Inside US	< 225,000	≥ 65,000	All	96% AFUE	Appendix N[g]
Warm-air furnace	Electric	1	Outside US	< 225,000	All	All	96% AFUE	Appendix N[g]
Warm-air furnace	Electric	3	All	< 225,000	All	All	96% AFUE	Appendix N[g]
Warm-air duct furnaces	Gas	All	All	All	All	All	80% E_c[d]	ANSI Z83.8

Warm-air unit heaters	Gas	All	All	All	All	All	80% E_c[d, e]	ANSI Z83.8
Warm-air unit heaters	Oil	All	All	All	All	All	80% E_c[d, e]	Section 40 UL 731

No change to the remaining text.

Table C403.2.3(11)

TABLE C403.2.3(11)—ELECTRICALLY OPERATED VARIABLE-REFRIGERANT-FLOW AIR CONDITIONERS—MINIMUM EFFICIENCY REQUIREMENTS

EQUIPMENT TYPE	SIZE CATEGORY	HEATING SECTION TYPE	SUBCATEGORY OR RATING CONDITION	MINIMUM EFFICIENCY	TEST PROCEDURE[a]
VRF air conditioners, air cooled	< 65,000 Btu/h three-phase for applications in the US and single- and three-phase for applications outside the US	All	VRF multisplit system	~~13.0~~ 13.4 SEER2	AHRI 210/240
	≥ 65,000 Btu/h and < 135,000 Btu/h	Electric resistance (or none)	VRF multisplit system	~~10.5 EER~~ 15.5 IEER	AHRI 1230
	≥ 135,000 Btu/h and < 240,000 Btu/h	Electric resistance (or none)	VRF multisplit system	~~10.3 EER~~ 14.9 IEER	
	≥ 240,000 Btu/h	Electric resistance (or none)	VRF multisplit system	~~9.5 EER~~ 13.9 IEER	

For SI: 1 British thermal unit per hour = 0.2931 W.

a. Chapter 6 contains a complete specification of the referenced standards, which include test procedures, including the reference year version of the test procedure.

Table C403.2.3(12)

TABLE C403.2.3(12)—ELECTRICALLY OPERATED VARIABLE-REFRIGERANT-FLOW AND APPLIED HEAT PUMPS—MINIMUM EFFICIENCY REQUIREMENTS

EQUIPMENT TYPE	SIZE CATEGORY	HEATING SECTION TYPE	SUBCATEGORY OR RATING CONDITION	MINIMUM EFFICIENCY	TEST PROCEDURE[a]
VRF air cooled (cooling mode)	< 65,000 Btu/h three-phase for applications in the US and single- and three- phase for applications outside the US	All	VRF multisplit system	SEER2 = 13.4	AHRI 210/240
	≥ 65,000 Btu/h and < 135,000 Btu/h	Electric resistance (or none)	VRF multisplit system	~~10.3 EER~~ 14.6 IEER	AHRI 1230
			VRF multisplit system with heat recovery	~~10.1 EER~~ 14.4 IEER	
	≥ 135,000 Btu/h and < 240,000 Btu/h		VRF multisplit system	~~9.9 EER~~ ~~14.4~~ 13.9 IEER	
			VRF multisplit system with heat recovery	~~9.7 EER~~ 13.9~~7~~ IEER	
	≥ 240,000 Btu/h		VRF multisplit system	~~9.1 EER~~ 12.7 IEER	
			VRF multisplit system with heat recovery	~~8.9 EER~~ 12.5 IEER	

VRF water source (cooling mode)	< 65,000 Btu/h	All	VRF multisplit systems 86°F entering water	~~12.0 EER~~ 16.0 IEER	AHRI 1230
			VRF multisplit systems with heat recovery 86°F entering water	~~11.8 EER~~ 15.8 IEER	
	≥ 65,000 Btu/h and < 135,000 Btu/h		VRF multisplit system 86°F entering water	~~12.0 EER~~ ~~16.0~~ 15.8 IEER	
			VRF multisplit system with heat recovery 86°F entering water	~~11.8 EER~~ 15.8 IEER	
	≥ 135,000 Btu/h and < 240,000 Btu/h		VRF multisplit system 86°F entering water	~~10.0 EER~~ 14.0 IEER	
			VRF multisplit system with heat recovery 86°F entering water	~~9.8 EER~~ 13.8 IEER	

TABLE C403.2.3(12)—ELECTRICALLY OPERATED VARIABLE-REFRIGERANT-FLOW AND APPLIED HEAT PUMPS—MINIMUM EFFICIENCY REQUIREMENTS—continued

EQUIPMENT TYPE	SIZE CATEGORY	HEATING SECTION TYPE	SUBCATEGORY OR RATING CONDITION	MINIMUM EFFICIENCY	TEST PROCEDURE [a]
VRF water source (cooling mode) (continued)	≥ 240,000 Btu/h	All	VRF multisplit system 86°F entering water	~~10.0 EER~~ 12.0 IEER	AHRI 1230
			VRF multisplit system with heat recovery 86°F entering water	~~9.8 EER~~ 11.8 IEER	

No change to the remaining text.

TAC Recommendation: Glitch – AS – 9-0

Commission Action:

Errata – Consistency with the Commission's approved modification

EN – Ch. C4 – Comment #2

From: Eric Lacey

I'm sending this email to alert you to what I think is an editorial issue in the 9th Edition integrated draft of the FL Building Code, Energy Conservation. The effects of proposals EN12127 and 12330 are not fully reflected in Table C402.5.

First, the 2024 IECC no longer applies orientation-specific SHGCs for vertical fenestration, but rather assigns requirements based on whether the fenestration is fixed or operable. Second, the SHGC values for operable fenestration in climate zone 2 still reflect the 8th edition values in the integrated draft. And third, the U-factors and SHGC requirements for skylights do not appear to be updated per the approved proposals. Thus, Table C402.5 should be adjusted as follows, which would maintain consistency with the 2024 IECC and proposals EN12127 and EN12330:

TABLE C402.4

BUILDING THERMAL ENVELOPE FENESTRATION MAXIMUM *U*-FACTOR AND SHGC REQUIREMENTS

CLIMATE ZONE	1	2	3	4 EXCEPT MARINE	5 AND MARINE 4	6	7	8
Vertical fenestration								
***U*-factor**								
Fixed fenestration	0.50	0.45	0.46	0.38	0.38	0.36	0.29	0.29
Operable fenestration	0.62	0.60	0.60	0.45	0.45	0.43	0.37	0.37
Entrance doors	0.83	0.77	0.77	0.77	0.77	0.77	0.77	0.77
SHGC								

~~Orientation~~[a]	~~SEW~~ Fixed	~~N~~ Operable	~~SEW~~ Fixed	~~N~~ Operable	~~SEW~~ Fixed	~~N~~ Operable	~~SEW~~ Fixed	~~N~~ Operable	~~SEW~~ Fixed	~~N~~ Operable	~~SEW~~ Fixed	~~N~~ Operable	~~SEW~~ Fixed	~~N~~ Operable	~~SEW~~ Fixed	~~N~~ Operable
PF < 0.2	0.23	0.21	0.25	0.33	0.25	0.33	0.40	0.53	0.40	0.53	0.40	0.53	0.45	NR	0.45	NR
0.2 ≤ PF < 0.5	0.28	0.25	0.30	0.37	0.30	0.37	0.48	0.58	0.48	0.58	0.48	0.58	NR	NR	NR	NR
PF ≥ 0.5	0.37	0.34	0.40	0.40	0.40	0.40	0.64	0.64	0.64	0.64	0.64	0.64	NR	NR	NR	NR
Skylights																
U-factor	0.70		0.65		0.55		0.50		0.50		0.50		0.50		0.50	
SHGC	0.30		0.35		0.35		0.40		0.40		0.40		NR		NR	

NR = No requirement, PF = Projection factor.

~~a. "N" indicates vertical fenestration oriented within 45 degrees of true north. "SEW" indicates orientations other than "N." For buildings in the southern hemisphere, reverse south and north. Buildings located at less than 23~~

TAC Recommendation: Errata – AS – 9-0

Commission Action:

Errata – Consistency with the Commission's approved modification

EN – Ch. R4 – Comment #3

Jeff Sonne

For the R407.2.3(3) entry in Table R407.2, there should be a footnote "c" next to the section number as shown in red below (my omission in the original mod).

R407.2.2(4)[b]	High performance heat pump (Option 2: 16.5 SEER2/8.2 HSPF2)	9	9
R407.2.3(1 or 2)[c]	Efficient water heating	6	6
R407.2.3(3)[c]	Efficient heat pump water heater exhausted to conditioned space	9	9
R407.2.3(4)(a)[c]	Solar hot water heating system (Option 1)	13	13

TAC Recommendation: Errata – AS – 9-0

Commission Action:

Errata – Consistency with the Commission's approved modification

EN – Ch. R3 – Comment #4

Jeff Sonne

R303.1.3 Fenestration product rating. *U*-factors of fenestration products shall be determined as follows.
1. For windows, doors and skylights, *U*-factor ratings shall be determined in accordance with NFRC 100.

2. Where required, garage door *U*-factors shall be determined in accordance with either NFRC 100 or ANSI/DASMA 105.

U-factors shall be determined by an accredited, independent laboratory, and *labeled* and certified by the manufacturer as authorized by an NFRC-licensed independent certification and Inspection Agency (IA).

Products lacking such a *labeled* and certified *U*-factor shall be assigned a default *U*-factor from Table R303.1.3(1) or R303.1.3(2). The solar heat gain coefficient (SHGC) and *visible transmittance* (VT) of glazed fenestration products (windows, glazed doors and skylights) shall be determined in accordance with NFRC 200 by an accredited, independent laboratory, and *labeled* and certified by the manufacturer as authorized by an NFRC-licensed independent certification and Inspection Agency (IA). Products lacking such a *labeled* SHGC or VT shall be assigned a default SHGC or VT from Table R303.1.3(3). For tubular daylighting devices, VT_{annual} shall be measured and rated in accordance with ANSI/NFRC 203.

TAC Recommendation: Errata – AS – 9-0

Commission Action:

Errata – Editorial

EN – Ch. RD Appendix – Comment #5

Staff

DUCT LEAKAGE TEST REPORT
Residential Prescriptive, Performance Or ERI Method Compliance 2026 Florida Building Code, Energy Conservation, 9th Edition

Jurisdiction:		Permit #:
Job Information		
Builder:	Community:	Lot:
Address:		
City:	State: FL	Zip:
Duct Leakage Test Results	○ Prescriptive Method	○ Performance/ERI Method
System 1 _____ cfm25	○ **Prescriptive Method** cfm25 (Total) To qualify as "substantially leak free," Q_n Total must be less than or equal to 0.04 if air handler is installed. If air handler unit is not installed, Q_n Total must be less than or equal to 0.03. T testing method meets the requirements in accordance with Section R403.3.3.	
System 2 _____ cfm25		
System 3 _____ cfm25		
Sum of any others _____ cfm25	*Is the air handler unit installed during testing?* ☐ YES (≤ 0.04 Q_n) ☐ NO (≤ 0.03 Q_n)	
Total of all_____ cfm25	○ **Performance/ERI Method** cfm25 (Out or Total)	

_____ ÷ _____ = _____ Q_n Total of all systems — Total Conditioned Square Footage ☐ PASS ☐ FAIL	To qualify using this method, Q_n must not be greater than the proposed duct leakage Q_n specifi on Form R405—~~2023~~ or R406—~~2023~~. *Leakage Type selected on Form R405—~~2023~~ (EnergyCalc) or R406—~~2023~~* — *Q_n specified of Form R405—~~2023~~ (EnergyCalc) or R406—~~2023~~*

Duct tightness shall be verified by testing in accordance with ANSI/RESNET/ICC380 by either individuals as defined in Section 553.993(5) or (7), *Florida Statutes*, or individuals licensed as set forth in Section 489.105(3)(f), (g) or (i), *Florida Statutes*.

Testing Company

Company Name: _____ Phone: _____

I hereby verify that the above duct leakage testing results are in accordance with the Florida Building Code requirements with the selected compliance path as stated above, either the Prescriptive Method or Performance Method.

Signature of Tester: _____ Date of Test: _____

Printed Name of Tester: _____

License/Certification #: _____ Issuing Authority: _____

TAC Recommendation: Errata – AS – 9-0

Commission Action: