

**From:** Dan Dettmers <ddettmers@madisonair.com>  
**Sent:** Wednesday, January 14, 2026 5:22 PM  
**To:** Madani, Mo <Mo.Madani@myfloridalicense.com>  
**Subject:** Comment on R403.13 Dehumidifiers for the 2026 Florida Building Code

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Mr. Madani:

I would like to submit comment on section R403.13 Dehumidifiers (Mandatory) of the Florida building Code, Energy Conservation.

I contend that the following portion of section R403.13 is in conflict and potentially pre-empts U.S. Federal dehumidifier efficiency and testing requirements as established in 10 CFR 430 [Energy Conservation Program for Consumer Products](#):

*If installed, a dehumidifier shall conform to the following requirements:*

1. *The minimum rated efficiency of the dehumidifier shall be greater than 1.7 liters/kWh if the total dehumidifier capacity for the house is less than 75 pints/day and greater than 2.38 liters/kWh if the total dehumidifier capacity for the house is greater than or equal to 75 pints/day.*

To avoid conflict with federal regulation, I would suggest changing this wording to one of these two options:

#### **Option 1**

*If installed, a dehumidifier shall conform to the following requirements:*

1. *The minimum rated efficiency of the dehumidifier shall comply with the requirements of 10 CFR 430: [Energy Conservation Program for Consumer Products](#) including the product configurations defined in 10 CFR 430.2, the testing requirements of 10 CFR 430.23(z) and the efficiency requirements of 10 CFR 430.32(v).*

#### **Option 2**

*If installed, a dehumidifier shall conform to the following requirements:*

1. *At the time of installation, the dehumidifier must be listed in the [Department of Energy's Compliance Certification Database](#) and certified for the product configuration, whole-home or portable, corresponding to the dehumidifier's installation.*

I do not believe there are any further conflicts between the remaining wording of section R403.13, including R403.13.1, and any Federal Regulations. If you have any further questions, feel free to reach out to me at 608-237-8470 or [ddettmers@madisonair.com](mailto:ddettmers@madisonair.com).

Sincerely,

**Dan Dettmers**

Technical Regulatory Associate Director



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