

November 17, 2020

Florida Building Commission  
Thomas Campbell  
Jeff Blair, Facilitated Solutions  
James Schock, Vice Chairman

Re: FHBA Request to Delay the Florida Building Code, Energy Conservation, 7<sup>th</sup> Edition (2020)

Mr. Campbell:

On behalf of the more than 8,000 members of the Florida Home Builders Association (FHBA), I am requesting that the Florida Building Commission strongly consider delaying implementation of the Florida Building Code, Energy Conservation 7<sup>th</sup> Edition (2020). It has come to our association's attention that multiple energy software tools that provide detailed performance-based analysis of building energy use have not yet been updated to comply with the Florida Building Code, Energy Conservation 7<sup>th</sup> Edition (2020). These software programs are critical for proving compliance with the updated code. Additionally, as you are well aware, the updated software must be reviewed and approved by the Florida Building Commission before release to the public.

Builders cannot plan for future projects or update master plan files to meet the new code due to the unavailability of the software builders have come to rely upon to perform these complex calculations. Accordingly, FHBA is requesting that the Florida Building Commission delay the Florida Building Code, Energy Conservation 7<sup>th</sup> Edition (2020) for six months from the time a software program, such as EnergyGauge, is approved by the Florida Building Commission. Coupling implementation of the Florida Building Code Energy Conservation 7<sup>th</sup> Edition (2020) (FBC-EC) with the date of Commission approval of software will allow time to evaluate, identify, and correct problems discovered before the FBC-EC becomes mandatory. During the six-month interval, builders and developers would continue to use Florida Building Code, Energy Conservation, Sixth Edition (2017).

Lastly, we would like to thank the Commission and Staff for their leadership in navigating these unprecedented times. Should you have any questions or need further information, please do not hesitate to reach out to our CEO, Rusty Payton, at (850) 567-1073 – [rpayton@fhba.com](mailto:rpayton@fhba.com) or our Director of Government Affairs, Dane Bennett, at (941) 468-8479 – [dbennett@fhba.com](mailto:dbennett@fhba.com). Thank you for your time and dedication to our great State; we are grateful for your consideration.

Sincerely,



Scott McCracken  
President