



**Informal Interpretation Report
Number 8860**



Date January 08, 2024

Edition 2023

Section R403.7.2

Question:

Is the intent of this code that when doing a residential equipment changeout that electric heat cannot be used as primary heat source ?

Answer

No,
Section R501.7.2, Florida Building Code, 8th Edition (2023), Energy Conservation, does not apply to either new installation or the upgrade of HVAC equipment except under certain circumstances.

Per section R101.4.2, the Florida Building Code, 8th Edition, Energy Conservation, only applies when the existing building is considered a “renovated building,” is undergoing a change in occupancy, or was a previously unconditioned building to which comfort conditioning is added. The Florida Building Code, 8th Edition (2023), defines a “renovated building” as “a residential or nonresidential building undergoing alteration that varies or changes insulation, HVAC systems, water heating systems or exterior envelope conditions, provided the estimated cost of renovation exceeds 30 percent of the assessed value of the structure.”

Therefore, unless the total renovation cost exceeds 30 percent of the assessed value of the structure, Section R501.7.2 does not apply to the new installation or upgrade of HVAC equipment.

- R501.7.2 Electric space heating – Electric resistance shall not be the primary space heating system type used for complete central equipment replacements in Climate Zone 2.
- R101.4.2 Exempt buildings – Buildings exempt from the provisions of the Florida Building Code, Energy Conservation, include existing buildings except those considered renovated buildings, changes of occupancy type or previously unconditioned buildings to which comfort conditioning is added. Exempt buildings include those specified in Sections R101.4.2.1 through R101.4.2.4.
- Renovated Building – A residential or nonresidential building undergoing alteration that varies or changes insulation, HVAC systems, water heating systems or exterior envelope conditions, provided the estimated cost of renovation exceeds 30 percent of the assessed value of the structure.

Commentary:

None.

Notice:

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Business & Professional Regulation, ICC, and industry and professional experts offer this interpretation of the Florida Building Code in the interest of consistency in their application statewide. This interpretation is informal, non-binding and subject to acceptance and approval by the local building official.