



November 13, 2020

Mr. Rusty Payton Chief Executive Officer Florida Home Builders Association 2600 Centennial Place Tallahassee, FL 32308

Rusty,

This letter is written on behalf of our GCBA members in requesting that the 2020 Florida Building Code, Energy Conservation, 7th Edition (2020 FBC-E), implementation date be delayed for a period of six (6) months following the release of the state approved EnergyGauge software.

Our members are expressly concerned that they are unable to plan for the impact of the changes made in 2020 FBC-E until the software is released. Section R405.3 through Section R405.4.3 outline the use of computer software to demonstrate that new residential structures are compliant with the 2020 FBC-E; 2020 FBC-E states that the software must be approved by the Florida Building Commission before it can be used to generate reports for new permit packages to prove compliance.

Since this software is required to prove compliance with the code, and to date, the approved EnergyGauge software has not been released to our members and the public; this does not allow sufficient time for our members to prepare as it relates to the time allotted in the 2020 Florida Statutes outlined below for all other Florida Building Code discipline specific documents. Florida Statute 553.901, Item (e) A rule updating the Florida Building Code in accordance with this subsection shall take effect no sooner than 6 months after publication of the updated code.

We respectfully request that the state approved energy software be held to this same regulation. We feel that the date of the 2020 FBC-E should be delayed for six (6) months following the release of the state approved software program(s).

Thank you for consideration of our request. Please let us know how GCBA can support you at FHBA in getting this accomplished.

Sincerely,

Katherine "KT" Catlin

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