From: Amanda Hickman <amanda@thehickmangroup.com>
Sent: Monday, November 17, 2025 11:06 AM
To: Madani, Mo <Mo.Madani@myfloridalicense.com>
Subject: FBC - Request to pull Energy Mods from the consent agenda

Good morning, Mo,

I would like to request pulling the following mods from the Commission's December meeting consent agenda: EN11866, EN11867, EN12135. Specific requested language and reasons to follow for each.

EN11867 was recommended for approval by the Energy TAC, however, due to evolving Federal regulations we need to revise the FBC language to the following to better coordinate with Fedral regulations and avoid conflicts which could cause disruptions in product availability and construction delays.

Replace mod with the following:

Section C202 Definitions
AIR CIRCULATING FAN.
A fan that has no provision for connection to ducting or separation of the fan inlet from its outlet using a pressure boundary, operates against zero external static pressure loss, and is not a jet fan or a ceiling fan.
EQUIVALENT DIAMETER. The diameter of a circle with the same area as another geometric shape. For a rectangular cross section with width a and height b, the equivalent diameter is given as D = (4ab/π)^0.5
C403.2.12.8 Air Circulating Fans. Where provided, air circulating fans with input power greater than or equal to ~~125W~~200W at maximum speed shall be tested and labeled in accordance with DOE 10 CFR 431 Appendix B to Subpart J and shall meet the efficiency requirements of Table C403. 2.12.8. The impeller diameter, electrical input power, and the airflow at maximum speed for each air circulating fan model shall be indicated on the construction documents.
Table C403.2.12.8 - Air Circulating Fan Efficiency Requirements

Equipment Type	Category	Minimum Efficiency[a]	Test Procedure
Air Circulating Fan	≥200W input power		

	U.S.: 10 CFR 431 Appendix B to Subpart J, if required otherwise use AMCA 230

a. Eff_{circ} is the efficacy for *air circulating fans* (CFM/W). D is the impeller diameter for unhoused fans, and the lesser of impeller diameter and *equivalent diameter* for housed fans (inches). Q is the *air circulating fan* airflow rate, determined by the referenced test procedure at the maximum fan speed (cfm).

Chapter 6 Referenced Standards

Update standard(s) as follows:

AMCA Air Movement and Control Association International30 West University Drive Arlington Heights IL 60004-1806

ANSI/AMCA 230-~~22~~ 23 with Errata Laboratory Methods of Testing Air Circulating Fans for Rating and Certification

EN11866: Replace Mod with the following for the same reason as previously stated mod.

C403.2.12.3 Fan efficiency. Each fan and *fan array* shall have a *fan energy index* (FEI) of not less than 1.00 at the design point of operation, ~~when~~ as determined in accordance with ~~AMCA 208~~ DOE 10 CFR 431 Appendix A to Subpart J by an *approved* independent testing laboratory and *labeled* by the manufacturer. Each fan and *fan array* used for a variable-air-volume system shall have an FEI of not less than 0.95 at the design point of operation, as determined in accordance with ~~AMCA 208~~ DOE 10 CFR431 Appendix A to Subpart J if required otherwise use AMCA 208- by an *approved* independent testing laboratory and *labeled* by the manufacturer. The FEI for fan arrays shall be calculated in accordance with AMCA 208 Annex C. The FEI shall be indicated on the construction documents for each fan and fan array.

Exceptions: The following fans are not required to have a fan energy index:
1. Fans that are not embedded fans with motor nameplate horsepower of less than 1.0 hp (0.75 kW) or with a nameplate electrical input power of less than 0.89 kW.
2. Embedded fans that have a motor nameplate horsepower of 5 hp (3.7 kW) or less, or with a fan system electrical input power of 4.1 kW or less.
3. Multiple fans operated in series or parallel as the functional equivalent of a single fan that have a combined motor nameplate horsepower of 5 hp (3.7 kW) or less or with a fan system electrical input power of 4.1 kW or less.
4. Fans that are part of equipment covered in Section C403.3.2.
5. Fans included in an equipment package certified by an approved agency for air or energy performance.
6. Ceiling fans, which are defined as nonportable devices suspended from a ceiling or overhead structure for circulating air

via the rotation of the blades.
7. Fans used for moving gases at temperatures above 482°F (250°C).
8. Fans used for operation in explosive atmospheres.
9. Reversible fans used for tunnel ventilation.
10. Fans that are intended to operate only during emergency conditions.
11. Fans outside the scope of AMCA 208.

EN12135: Unfortunately, I wasn't able to attend the Energy TAC meeting in October and was not able to explain the need for the attached comment that I had submitted. I would like the Commission to consider it given that it will add additional and needed appropriate design flexibility to the FBC. See attached.

Please let me know if you have any questions.

Best regards,

Amanda Hickman
President/Consultant

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