

# First-Stage Heat Pump 2026 ORSC Provisions Summary

New provisions have been proposed for the 2026 Oregon Residential Specialty Code (ORSC) Chapter 11 through the code review committee process related to first-stage heat pump operation where split-system air-conditioning is installed. This summary is intended to clarify the provisions and explain the application.

## Proposed code language

The 2026 ORSC Section N1105.8 proposed language is comprised of the Residential and Manufactured Structures Board’s residential energy code review committee recommended language and editorial revisions to align the section with committee requested updates to the scoping language of ORSC Chapter 11.

**N1105.8 Heat pump for split-system air-conditioning.** In new  *dwellings* where split-system air-conditioning is installed, the outdoor condensing unit and indoor evaporator coil shall have heat pump operation that provides both heating and cooling. Heat pump operation for heating shall be  *first stage heating*. The heat source sized for the  *dwelling* design-day heating load provides heating where  *first stage heating* cannot maintain the minimum required space temperature.

**Exception:** New  *dwellings* that comply with Section N1102.3.1, Item 3, or Section N1102.3.2, Item 3.

For the exception:

- Section N1102.3.1, Item 3 refers to new dwellings more than 1,500 square feet that comply with the prescriptive method requirements in Table N1102.3(1) and four additional measures.
- Section N1102.3.2, Item 3 refers to new dwellings not more than 1,500 square feet that comply with the prescriptive compliance path requirements in Table N1102.3(1) and three additional measures.

## What Section N1105.8 requires when using the ORSC prescriptive compliance path

When a new home is furnished with split-system cooling, the system must be a heat pump that can provide  *both* cooling  *and* the first stage of heating.



Cooling-only outdoor unit



Heat pump outdoor unit

- The heat pump supplements the heating system, regardless of fuel type used by the central furnace. When combined with a gas furnace, this system is also known as a hybrid system. The outdoor condensing unit has minor differences in piping and controls.
- When the home needs heating, the first stage of heating is provided by the heat pump. Then, at an optimum set-point temperature, central heating is provided by the fuel of choice.
- The outdoor unit is sized for the home cooling load, which sets the heating capacity of the heat pump unit.



### What Section N1105.8 does NOT do:

- Does not dictate the heating system fuel for the home. The heating system required to comply with the heating requirements in Section R325.8 may remain electric resistance, natural gas, propane, biofuel, or other fuel.
- Does not require heat pumps for existing HVAC systems. Section N1105.8 is for new dwellings only and does not apply to the replacement (alteration) of an existing cooling system.
- Does not require re-sizing the air-conditioning system cooling capacity when a heat pump is used. The desired cooling capacity of the heat pump dictates the heat pump's heating output as the first stage of heating.
- Does not prohibit the installation of a cooling-only system without first-stage heat pump operation. See alternate pathways for compliance below.

### Alternate pathways for compliance

There are *five* alternate pathways in the draft 2026 ORSC:

- **Section N1102.3.** Provides a prescriptive option where two additional energy measures may be selected in order to provide *equivalent energy cost savings* in lieu of providing a first-stage heat pump. (This option was added at the request of the RMSB Energy Code Review Committee.)
- **Section N1109 Energy Rating Index (ERI) compliance.**
- **New Section N1110 Simulated Building Performance.** Provides three energy modeling pathways comparing performance of a baseline home to a proposed home. These three pathways are:
  1. Energy cost, or
  2. Site energy usage, or
  3. Source energy usage

### Questions?

If you have questions, please contact the Building Codes Division at 503-903-3427.