

May 29, 2025

The Honorable Joseph J. Solomon, Jr.
Chairman, House Corporations Committee
Rhode Island State House
Providence, Rhode Island 02908

**RE: H-6361 – Relating to Public Utilities & Carriers – Regulatory Powers of Administration
(Electric and Gas Meter Reading Required Quarterly)**

Dear Chairman Solomon:

On behalf of Rhode Island Energy, I write in **opposition** to H-6361 in its entirety, which would, among other things, require the electric and natural gas distribution utility to “read, record and update utility billing on quarterly scheduled intervals.” The bill would also prevent Rhode Island Energy from collecting or requiring payment of any balance in the event a utility meter is not read on a quarterly basis.

Today, Rhode Island Energy is responsible for 800,000+ electric and gas meters across the state. The vast majority of our customers have their energy usage measured through Automated Meter Reading (AMR). AMR utilizes very short-range radio frequencies to communicate metering data to our vans as we drive down local streets, providing highly accurate reads. This information is then communicated to our billing systems and used to calculate a customer’s monthly utility bill. **Rhode Island Energy is now in the process of deploying Advanced Metering Functionality (AMF) across its electric service territory.** This investment is intended to address key unmet needs in Rhode Island, including replacement of existing electric AMR meters, which are reaching the end of their design life, are obsolete, and will not scale. Once fully implemented, AMF will allow the utility to see real-time customer usage sent directly to our billing systems and, in most cases, negate the need to manually access the meters themselves. **This technology will also improve transparency by enabling customers to see their own usage in near-real time.**

Importantly, while not a preferred practice, estimated meter readings are used across many utilities and are not unique to Rhode Island Energy. There are several reasons why a customer may have their energy consumption estimated. For instance, Rhode Island Energy uses estimates for connecting and disconnecting service (e.g., when a customer may need to transfer service during a move from one home to another). There may also be occasions, such as those involving severe weather, equipment failure, or failure to be granted access to a meter, when an estimated reading is necessary. This included the unprecedented COVID pandemic, during which many in-person businesses and services were locked down. To protect the safety and wellbeing of our employees and customers, manual meter reads for customers who had their utility meters located inside a home or business were paused.

Rhode Island Energy has implemented protocols to keep our customers informed and mitigate the number of estimated bills. For those customers receiving an estimated meter read, it is noted on their bills. At any time, if a customer believes the estimate is not accurate, they can call Rhode Island Energy’s customer service team and request that a manual read be taken – usually conducted within one to three business days. Also, in those instances where a customer identifies

an issue with an estimated read and/or associated billing reconciliation, Rhode Island Energy will work with them and the Division of Public Utilities & Carriers (DPUC) to resolve their concerns. On occasion, this includes testing the meter in place to ensure its accuracy. When a customer has received an estimated read for more than two months, a letter is sent asking them to call us so we can identify a path forward to eliminate the estimates and get an actual meter read. We will continue sending a letter each month until the situation is resolved.

The DPUC has established rules governing “Standards for Electric Utilities” (815-RICR-30-00-1) (Electric Standards), which include thorough requirements for electric meter reading, accuracy and testing. Similarly, the DPUC has established rules governing “Standards for Gas Utilities, Master Meter Systems and Jurisdictional Propane Systems” (815-RICR-20-00-1) (Gas Standards) that address meter installations, reading, accuracy, and testing. Both the Electric Standards and the Gas Standards already require that meters be read “at regular intervals.”¹ The latter allows for up to six months of estimation in service areas that do not utilize AMR unless a waiver is granted. In addition, the Electric Standards and Gas Standards include specific requirements for the rendering of bills.²

Finally, the proposed legislation prohibiting Rhode Island Energy’s ability to collect or require payment of any balance in the event a utility meter is not read on a quarterly basis is a violation of the doctrine of separation of powers under the Rhode Island Constitution as the Rhode Island Public Utilities Commission (PUC) is vested with the exclusive authority and jurisdiction over the rates, tariffs, tolls, and charges of the electric and gas distribution company under Rhode Island law.³ The proposed legislation would unlawfully interfere with the PUC’s regulatory oversight functions, as well as Rhode Island Energy’s obligation to charge the rates approved by and on file with the PUC in exchange for the services rendered pursuant to approved tariffs.

In closing, Rhode Island Energy respectfully asks the Committee to **oppose** H-6361 in its entirety.

Thank you for your consideration.

Respectfully,



Nicholas S. Ucci
Director of Government Affairs

CC: The Honorable Members of the House Corporations Committee
The Honorable Rebecca M. Kislak, Rhode Island House of Representatives

¹ Electric Standards, 815-RICR-30-00-1.3(E)(3) and Gas Standards, 815-RICR-20-00-1.4(E)2.

² See Electric Standards, 815-RICR-30-00-1.3(E) and Gas Standards, 815-RICR-20-00-1.4(E).

³ R.I. Gen. Laws § 39-1-3(a).