



April 2, 2026

Representative Joseph Solomon  
Chair, House Corporations Committee  
Rhode Island State House  
Providence, RI 02903

Re: House Resolution 7340 – HOUSE RESOLUTION RESPECTFULLY URGING RHODE ISLAND INSURERS AND THE RHODE ISLAND PROPERTY INSURANCE ASSOCIATION TO REDUCE INSURANCE COSTS ON LOCAL RESIDENTS BY PURSUING SUBROGATION CLAIMS AGAINST POLLUTERS WHO KNOWINGLY ENGAGED IN MISLEADING AND DECEPTIVE PRACTICES REGARDING THE CONNECTION BETWEEN THEIR PRODUCTS AND CLIMATE CHANGE

Dear Chair Solomon:

This statement in opposition to H.7340 is submitted by the American Property Casualty Insurance Association (APCIA).<sup>1</sup> **H.7340 has the potential to harm the state's well-functioning insurance market by encouraging insurers to take on the significant cost and risk of suing fossil fuel producers.** This resolution encourages insurers to pursue subrogation suits against fossil fuel providers. This is unprecedented and unnecessary given legal tools that already exist.

H.7340 is Unnecessary.

Tools already exist to pursue legal remedies where one party is believed to have caused harm to another. In fact, **Rhode Island has already filed a climate deception lawsuit against fossil fuel producers that has been pending in several jurisdictions for almost a decade.**<sup>2</sup> Rhode Island is one of eleven states and dozens of city, county and tribal governments<sup>3</sup> to take this approach. These cases present an open legal question that has recently been accepted for further consideration by the US Supreme Court.<sup>4</sup> **H.7340 would push insurers to follow the same uncertain litigation strategy, imposing new and unnecessary pressures on the state's insurance industry.**

H.7340 May Harm Rhode Island's Well-Functioning Insurance Market to the Detriment of Its Residents. APCIA supports a thoughtful and economically sound energy transition. Property casualty insurers have been long-time leaders in supporting responsible energy transition by insuring and investing in renewable energy and related technologies and addressing the impacts of climate change by advocating for stronger mitigation, resilience efforts, and building codes.

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<sup>1</sup> Representing 67% of the U.S. property casualty insurance market, APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers. APCIA members represent all sizes, structures, and regions, which protect families, communities, and businesses in the U.S. and across the globe. Several APCIA members are located in Rhode Island and many more do business here. APCIA members are integral to the state of Rhode Island. They write 76% of the property casualty insurance sold in this state. The P&C insurance industry employs over 3,200 Rhode Islanders, provides annual assistance of \$1.5 billion in claim payments to help customers in the state, and contributes over \$160 million annually to the state in premium taxes.

<sup>2</sup> <https://www.climatecasechart.com/collections/rhode-island-v-shell-oil-products-co-638fae>

<sup>3</sup> <https://climateintegrity.org/news/view/supreme-court-will-review-climate-deception-case-against-exxon>

<sup>4</sup> <https://apnews.com/article/supreme-court-climate-change-lawsuits-c8982af07855a7a6379e1313ebb71895>

However, insurers are already facing substantial challenges on many fronts, including record inflation, regulatory, legal system abuse, and increasing weather-related losses from numerous perils. **Pushing the insurance industry to also bear risky and expensive litigation may damage this market.**

For the foregoing reasons, we oppose H.7340 and welcome the opportunity to discuss other ways our industry can partner with Rhode Island on climate resiliency and energy transition.

Very truly yours,



Jonathan Schreiber  
Associate Vice President, State Government Relations  
American Property Casualty Insurance Association  
[Jonathan.schreiber@apci.org](mailto:Jonathan.schreiber@apci.org)  
(202) 828-7121