

STATE OF RHODE ISLAND

DIVISION OF PUBLIC UTILITIES & CARRIERS Administration 89 Jefferson Boulevard Warwick, Rhode Island 02888 (401) 941-4500 (401) 941-9207 - Fax

February 6, 2025

The Honorable David A. Bennett Chairman – House Committee on Environment and Natural Resources State House Providence, R.I. 02903

Re: H 5167 - Rhode Island Clean Heat Standard Act

Dear Chairman Bennett:

The Division of Public Utilities and Carriers (Division) embraces and is engaged in the ongoing discussion of obtaining our state's decarbonization goals. In that spirit, we appreciate the intent of the legislation but have serious reservations about the potential cost to ratepayers, and given the proposed legislation's broadly defined provisions, cannot support it in its present form.

As proposed, the clean heat standard would be analogous to the existing renewable energy standard. These programs present significant challenges of defining parameters and administration. Absent more specifically defined terms, the Division is concerned that the overall function of the clean heat standard, and potentially its administrative costs, could negatively impact ratepayers.

Among the Division's concerns is that the definition of "Clean Heat Measure" is not technology or fuel neutral. The inclusion of all renewable fuel sources offers an effective means to decarbonization that goes beyond the exclusive reliance on heat pumps and related technology that may not be suitable in all circumstances.

The Division shares the goal of decarbonizing the heating sector. We believe the creation of a new energy standard, if necessary to achieve this end, should contain more robust definitions and metrics to guide the program.

Sincerely,

Linda George, Esq.

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Administrator, RI Division of Public Utilities and Carriers

CC: The Honorable Representative Terri Cortvriend

The Honorable Members of the House Committee Environment and Natural Resources Nicole McCarty, Esq., Chief Legal Counsel