



Submitted via email

March 11, 2026

The Honorable David A. Bennett
Chair, House Committee on Environment and Natural Resources
State House
82 Smith Street
Providence, RI 02903

RE: H-7183 — Building Benchmarking and Reporting Act of 2026

Dear Chair Bennett and Members of the Committee:

The Rhode Island Office of Energy Resources (OER) appreciates the opportunity to provide comments on H-7183. OER respectfully opposes this legislation. OER supports the goal of improving the collection and use of building energy data to inform energy efficiency and emissions reduction strategies, as envisioned in the energy benchmarking proposal in the FY27 State Budget (H-7127).

As drafted, H-7183 would establish a new statewide benchmarking and reporting mandate for a broad universe of residential and non-residential buildings, along with significant program administration requirements. Implementing these new obligations, as proposed in this legislation, would impose material administrative costs on OER, including staff capacity, outreach and training, data management systems, and compliance support functions.

Additionally, the exemption categories listed in the bill does not account for buildings with unique characteristics that may not be well suited for benchmarking. Certain structures—particularly older buildings with architectural or mechanical limitations—may lack the infrastructure necessary to produce reliable benchmarking data without significant retrofits. Similarly, properties located on master-metered or campus-style systems, where energy usage is aggregated across multiple buildings, present technical challenges that make building-level benchmarking difficult or impractical. Without clear accommodations for these circumstances, the program would likely capture properties that cannot reasonably comply with the proposed requirements or could only do so through costly retrofits that may be technically impractical or cost-prohibitive.

Beginning with the pilot program for State-owned, State-occupied buildings and the voluntary benchmarking program for municipal buildings allows OER and the State to test the system and address operational issues. Launching a state-wide program prematurely risks widespread compliance challenges, unreliable data, and unnecessary penalties that could undermine participation.



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Importantly, OER notes that the FY 2027 State Budget (H-7127) proposal includes a budget article establishing an Energy Benchmarking and Performance Standards Program and related reporting requirements that develop the initial foundation for monitoring and improving building energy performance. That budget article directs the state to begin structured energy tracking and reporting, and it creates a pathway to build the underlying program infrastructure, and data practices needed for successful benchmarking implementation.

Thank you for your consideration. For all the foregoing reasons, OER respectfully urges the Committee not to advance H-7183.

Sincerely,

Chris Kearns
Acting Commissioner
Rhode Island Office of Energy Resources

CC:

The Honorable Rebecca Kislak
Members of the House Committee on Environment and Natural Resources
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House
Lynne Urbani, House Policy Director