



MAYOR BRETT P. SMILEY
CITY OF PROVIDENCE

March 11, 2026

Honorable Representative David A. Bennett, Chair
House Environment and Natural Resources Committee
Rhode Island House of Representatives
Providence, RI 02903

RE: Testimony in Support of H7183 Building Benchmarking and Reporting Act 2026, and H7184 Building Performance Standards Act of 2026

Dear Chair Bennett and members of the House Environment and Natural Resources Committee,

The City of Providence thanks Representatives Kislak, Fogarty, Carson, McGaw, Boylan, Speakman, Cortvriend, Handy, Bennett, Donovan, and Potter for sponsoring House Bills H7183 and H7184.

While the City of Providence supports H7184 that would develop a standard for building emissions to enable large building owners across the state decrease their carbon footprints in line with the Act On Climate, our testimony is focused on H7183 that precedes with establishing an energy benchmarking program for large buildings in Rhode Island. H7183 and H7184 would accelerate the energy efficiency and electrification needed across the building sector to prepare Rhode Island for a healthier and climate resilient future. Both proposed legislations are critical to economic growth, public health, and the environment.

The Act On Climate requires that the state reduces emissions to 45% below 1990 levels by 2030. The building sector, as stressed in the state's 2025 Climate Strategy Plan, is a critical target for carbon emission reductions. Currently, the state has no clear pathway to reduce these emissions. A building energy benchmarking requirement as described in H7183 is the most effective and foundational strategy for reducing greenhouse gas emissions from large buildings. Energy benchmarking will empower individual building owners to make informed, data-driven strategies to reduce their building's energy use – the City of Providence knows this from experience. In aggregate, reported data will inform the building energy use standard for buildings throughout the state and ensure that the state reduces emissions to be in compliance with the Act On Climate – cities and towns can play a critical role toward meeting this target with state support and direction.

City of Providence’s Lead by Example Case Study – A Cost-effective and Collaborative Framework

The City of Providence is in year three implementing a Building Energy Reporting Ordinance Program (BERO)¹ that requires owners of large buildings to report their energy use to the City for public disclosure. The City then discloses that data publicly, bringing transparency to the marketplace and unlocking the economic, health, and environmental benefits of energy efficiency. Although Providence is the first municipality in the state to launch a building energy reporting program referred to as BERO, over 30 municipalities and two states have passed benchmarking policies that require buildings to measure and report their energy use.

The Department of Sustainability designed our benchmarking program to drive meaningful engagement on climate by providing property owners with actionable insights to save on energy costs. Mayor Smiley signed into law the Building Energy Reporting Program on November 8, 2023, recognizing it an essential cornerstone to implement the City’s Climate Justice Plan and our pledge as a Climate Jobs City. Buildings account for the majority of the City’s carbon emissions—roughly 79.2% based on Providence’s 2021 Inventory of Citywide Greenhouse Gas Emissions². Given Providence’s priority to decarbonize the building sector, we have taken active steps towards advancing electrification and phasing out fossil fuels in buildings to lead by example with our BERO program, as well as other complementary key initiatives such as the Energy Efficiency and Carbon Neutral Ordinance, which requires carbon neutrality for all city-owned buildings by 2040.

Today, I am proud to share that our BERO program achieved a compliance rate of 42% for 2025, the first-year buildings 50,000+ square feet. reported their energy usage, that is more than twice the national average for first year benchmarking reporting. From the foundation of relationship building and collaboration, the Department of Sustainability collaborated with RI Energy to develop an application programming interface (API) connection with ENERGY STAR® Portfolio Manager® (ESPM). This streamlined the process for building owners and ensured the security of energy data flowing into ESPM. Additionally, the City and RI Energy broadened outreach by curating a joint letter targeting RI Energy customers that may be required to report under BERO. BERO is also strengthening partnerships and fostering relationships with a myriad of entities in the City including schools, businesses, non-profits and religious institutions. This is because the City of Providence has focused on building a program that rooted in outreach and education and collaboration—essential during the infancy of a new program.

Administering our BERO Program Cost-Effectively: To implement our administrative framework, the City secured grant funding to utilize a U.S. Department of Energy sponsored building energy analysis manager platform: BEAM. The BEAM platform takes data from ENERGY STAR Portfolio Manager to 1) perform comprehensive analytics and 2) provide enhanced reporting capabilities and customer relationship management (CRM) functionality. The City contracted with ClearlyEnergy, who is the service provider for BEAM, to provide enhanced help desk support for first-time benchmarking participants. The Department of Sustainability also populated the BEAM platform with a list of covered properties consisting of 853 properties—consisting of 784 private buildings—taken from data provided by the City’s Tax Assessor. The estimated cost of the software and services the City is currently utilizing to administer the program is \$27,200 annually, and slight increases are anticipated as the program grows. Additionally, the staffing time allocated to this program will increase over time based on what we have learned from the existing

¹ <https://www.providenceri.gov/sustainability/building-energy-reporting/>

² https://www.providenceri.gov/wp-content/uploads/2024/10/Providence-2021-Greenhouse-Gas-Inventory-Report_Final-DR-edits-1-PD-10.25.24.pdf

benchmarking programs outside of Rhode Island. However, the Department of Sustainability, in now year three of our program continues to cost-effectively and successfully manage and enhance the program with the equivalent of a part-time staff member, the City of Providence's Energy Manager.

During 2024, the first year of the BERO program, the City of Providence identified and successfully reported on 69 city-owned properties³ with 10,000 or more gross square feet that were occupied in 2023 or received energy services for that entire calendar year—all publicly disclosed in our first annual Building Energy Report: Setting the Baseline for Carbon Neutrality⁴. Energy consumption data was uploaded to ENERGY STAR Portfolio Manager for each of these properties to establish the City's energy use baseline. The City uses PowerOption's Energy Intelligence Suite (EIS) to strategically manage our 1,181 utility accounts for annual cost of \$69,469. EIS enables utility bill tracking and energy data analytics for our municipal buildings and streetlights, enhancing how the City identifies energy efficiency improvements across facilities to maximize cost saving opportunities for the City, which will serve as a strong example for private building owners.

As we move forward with continuous outreach to private building owners, the City is committed to working closely with property owners, providing tools, resources and guidance to ensure increased participation in the program. This year, our BERO program has expanded reporting to privately owned buildings greater than 20,000 square feet. The aggregated data will be disclosed by Providence yearly to inform future comparisons, enabling us to evaluate progress, inform energy efficiency policies and investments, and make tangible steps towards the City's target of achieving carbon neutrality by 2050.

Providence is an active partner of the EC4, RI OER, and RI Energy: As an active partner of the EC4, including the RI Office of Energy Resources, Providence is committed to sharing our insights and experience to support the state in creating a statewide benchmarking program for both public and private buildings. We continue to actively discuss the importance of developing a statewide covered property list of building owners that can be enhanced overtime with appropriate contact information, and the opportunity that the state has to replicate Providence's cost-effective and collaborative program administration. Through partnerships, Providence has been able to amplify targeted outreach efforts to create awareness about 1) the program, 2) offer support to building owners to report their energy usage, and 3) provide education about the cost saving benefits of energy efficiency tied to building to energy reporting. Providence's phased rollout approach also ensures that property owners have the time and resources to comply effectively with the City's support and that of its partners by providing guidance and education on reporting and energy efficiency resources available. Our program underscores how affordable it is to implement platforms that support comprehensive data analytics and customer relationship management functionality to adequately disclose energy use reporting and equip building owners with actionable insights.

³ <https://www.providenceri.gov/wp-content/uploads/2024/12/Exhibit-A-v2.pdf>

⁴ <https://www.providenceri.gov/wp-content/uploads/2024/12/2024-BERO-Report-FINAL-1.pdf>

In conclusion, for the aforementioned reasons, including the important role that building energy benchmarking, electrification, and decarbonization plays in the state's ability to meet Act On Climate mandates, and the tangible economic and environmental benefits of emissions reductions for the health of our communities, the City of Providence strongly supports the passage of H7183 and H7184.

Thank you for your consideration.

Sincerely,



Priscilla De La Cruz
Director of Sustainability