March 11th, 2026

The Honorable David Bennett
Chair, House Environment and Natural Resources Committee
Rhode Island State House
Providence, RI 02903

Re: Opposition to House Bills 7183 and 7184

Dear Chair Bennett, Vice Chair Phillips, Second Vice Chair Carson, and Distinguished Committee Members,

Rhode Island and Mortgage Finance Corporation ("RIHousing") respectfully opposes House Bill 7183, *An Act Relating to Health and Safety – Building Benchmarking and Reporting Act of 2026* and House Bill 7184, *An Act Relating to Health and Safety – Building Performance Standards Act of 2026*. These bills would respectively establish an energy benchmarking program and building energy performance standards for large buildings.

House Bill 7183 would require all buildings larger than 25,000 sq ft to report to the Office of Energy Resources (OER) on their energy usage annually. We are concerned that the OER does not currently have the staffing or infrastructure to identify, educate, train and communicate with all of the property owners that would be subject to this requirement.

More concerning is House Bill 7184 which would require all large buildings to comply with undefined building energy performance standards to be established by OER and DEM. Rhode Island has one of the oldest housing stocks in the country, so many of the structures covered by this bill would likely require significant investments to achieve the proposed standards. Most larger developments in Rhode Island are required to have separate electric meters for each unit, so while property owners would be responsible for making the required improvements, they would benefit little from the cost savings that would result from those improvements. With federal energy efficiency programs facing an uncertain future, the cost of those investments would likely be passed along to tenants who are already facing serious housing cost burdens.

In the Governor's Fiscal Year 2027 budget, he proposes legislation to create a state facilities benchmarking and performance standards program. This initiative would require the collection and reporting of annual energy use and greenhouse gas emissions data for state-owned and state-occupied buildings. Under the proposal, the Office of Energy Resources (OER) and the Department of Administration would be responsible for determining which facilities should be included in benchmarking and for establishing emission-reduction performance standards.

We believe this represents a more practical and achievable approach to energy benchmarking and performance standard development for Rhode Island. Notably, in 2025 OER released a report outlining recommended strategies for implementing benchmarking and performance standards for large public and private buildings. That report also identified several significant challenges associated with implementing a benchmarking program of the scale envisioned in this legislation.

RIHousing supports the goal of improving the energy efficiency of the state's housing supply and encouraging the use of renewable energy. For the housing we finance, RIHousing has established strong energy efficiency design and construction standards, and we prioritize developments that incorporate renewable energy, are all electric or meet zero energy or passive house standards. RIHousing has also partnered with the Office of Energy Resources (OER) and Rhode Island Energy to fund the Zero Energy for the Ocean State (ZEOS) program which finances the development of affordable, energy-efficient homes with zero net energy consumption.

We respectfully submit that the move toward more energy-efficient, sustainable housing should be approached thoughtfully, with a full understanding of the associated costs and practical challenges, and with strategies in place to limit the impact on both renters and property owners. We appreciate the opportunity to provide comments on this legislation and welcome continued dialogue on the most effective path forward for addressing this important issue.

Sincerely,

Carol Ventura
Executive Director