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March 25, 2026

**VIA ELECTRONIC MAIL**

House Environment and Natural Resources Committee  
Rhode Island General Assembly  
82 Smith Street  
Providence, RI 02903

***RE: House Bill 7912 - Amend***

Dear Committee Members:

Suburban Propane has been serving customers for nearly 100 years and is the nation's third-largest propane retailer with operations in 42 states. In Rhode Island, we have 15 employees serving more than 6,500 residential, commercial, and industrial customers.

We write today regarding House Bill 7912, which would establish a clean heat standard for Rhode Island's thermal sector.

**Although Suburban supports the State's overall goal of reducing carbon emissions, we believe the proposal as currently drafted will ultimately be detrimental to those efforts. If the ultimate purpose of Rhode Island's clean heat standard is to lower carbon emissions in the thermal sector, then the state should use every tool it has available.**

**Rather than pushing consumers towards the use of specific energy sources, we urge the state to amend the proposal to pursue a truly technology neutral approach that expands the definition of clean heat measure to include switching to all available lower carbon intensity (CI) energy options, regardless of source.**

While we applaud the proposal's reliance on CI as a metric in its emissions reduction efforts, it is critical that only carbon intensity reductions be considered when defining a clean heat measure, rather than arbitrarily excluding the use of certain low-carbon options.



The proposal would preclude switching from fuels with high CI scores to lower-CI fuels like traditional propane from qualifying as a clean heat measure. Additionally, the proposed language expressly excludes the use of renewable natural gas (RNG) and hydrogen from the definition of clean heat measures, despite being low-carbon, carbon-neutral, or even carbon-negative options.

**By eliminating easily achievable reductions in carbon intensity from qualifying as a clean heat measure, the proposal becomes immediately less effective from an environmental perspective and more costly to consumers in the short and long-term.**

RNG, for example, can have CI scores below zero and be used as a drop-in replacement for current natural gas customers. This means it can be used with existing infrastructure, saving thousands of dollars in conversion costs, while also having an immediate impact on reducing emissions. In excluding it, the state is leaving a powerful tool in reducing carbon emissions unused.

**Further, the state should not discriminate against the transition to any lower CI energy when determining clean heat measures, including traditional propane.**

HB 7912 excludes the shift from one fossil fuel to another from the definition of a clean heat measure. While renewable low-CI fuels are already available to consumers, it will take time to bring them to widespread commercial scale. During this transition, the state should not discourage the use of lower carbon energy such as traditional propane, regardless of origin source.

Propane is a cleaner, reliable and abundant energy source that thousands of Rhode Island communities depend on for heating, cooking, and other purposes. To harness the benefits of energy like traditional propane, the standard must then be centered around lowering CI rather than pushing customers towards specific energy. This will result in immediate reductions in carbon emissions as residents move away from higher CI energy towards their preferred low carbon option. This is particularly critical during these early stages of the energy transition where access to renewables may not be widespread, particularly in rural and low-income areas.

**Finally, emissions reduction programs like clean heat standards can only succeed when all available tools are used without preference for source.**

Technology neutral programs focused on the transportation sector like the Low Carbon Fuel Standard in California have been incredibly successful at reducing emissions because they incentivize the production and use of clean energy, regardless of type. As clean energy options become more widespread, prices will drop and consumer acceptance will increase, leading to a corresponding uptick in consumption. Suburban



Propane has been a vocal supporter of these programs, which have exceeded their emissions reduction goals without impacting fuel prices.<sup>1</sup>

Meaningful reductions in emissions will be achieved only if Rhode Island adopts a truly technology-neutral approach and embraces the use of all available low-carbon energy sources. We again urge the Committee to amend the proposal to expand the definition of “clean heat measure” to include switching to any lower CI option. Please let me know if you have any questions or need additional information. If you would like, we would be happy to set up a meeting to discuss. Thank you for your consideration.

Sincerely,

/s/ Rick Chandler \_\_\_\_\_

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<sup>1</sup> [California Air Resources Board - LCFS Fuel Prices Fact Sheet](#)