

March 18, 2021

The Honorable David A. Bennett, Chairman  
Rhode Island House Committee  
on Environment & Natural Resources  
State House  
Providence, RI 02903

**Re: National Grid’s Comments on Bill H 5966**

Dear Chairman Bennett:

On behalf of National Grid,<sup>1</sup> I write to submit the Company’s comments on Bill H 5966<sup>2</sup> (“Proposed Legislation”), which would establish minimum energy and water efficiency standards for certain products sold or installed in Rhode Island. National Grid supports the Proposed Legislation, which aligns with National Grid’s very ambitious energy savings goals. National Grid offers the specific comments below regarding the Proposed Legislation:

**1. National Grid Supports the New Products Set Forth in the Proposed Legislation.**

Section 39-27.1-5 of the Proposed Legislation provides that the Commissioner of the Rhode Island Office of Energy Resources, in consultation with other appropriate agencies, shall adopt regulations that establish minimum efficiency standards for the types of new products set forth in § 39-27.1-4 of the Proposed Legislation. National Grid supports the new products set for in the Proposed Legislation. These products were selected using a comprehensive approach and span residential, commercial, and industrial applications for electric and natural gas savings. National Grid understands that rigorous analysis confirmed that these products were the most cost-effective and market-appropriate opportunities that were readily available to consumers.

One of Rhode Island’s priorities is to remain a leader in energy efficiency. Rhode Island would undoubtedly increase its ACEEE (“American Council for an Energy-Efficient Economy”) Scorecard rank by adopting these standards. In fact, “Appliance and Equipment Efficiency Standards” is the only ACEEE Scorecard category for which Rhode Island currently scores zero points. Based on last year’s rankings, passing the Proposed Legislation this year would allow Rhode Island to reclaim its third place ranking after falling to fourth place in 2020.

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”).

<sup>2</sup> <http://webservice.rilin.state.ri.us/BillText/BillText21/HouseText21/H5966.pdf>

## **2. Along With National Grid, Others in the Northeast Region Support the Standards in the Proposed Legislation.**

Those who oppose the Proposed Legislation may argue that the Proposed Legislation would put those in Rhode Island who sell these products in conflict with neighboring states. However, to the contrary, Rhode Island risks misalignment with its bordering states and the largest nearby markets if it does *not* adopt the standards set forth in the Proposed Legislation. The Northeast region, including each of Rhode Island's neighboring states and the largest nearby markets, is united in advancing these standards by or before the January 1, 2023 effective date proposed by H 5966. Specifically:

- In Massachusetts, current session bill S.9 includes the same product standards proposed in H 5966 (except for air purifiers, cold temperature and impact-resistant fluorescent lamps, and gas fireplaces) and proposes an effective date of January 1, 2022<sup>3</sup>. It is also highly likely to be signed into law: this high-priority bill has already been sent to the Governor, who returned amendments in February 2021 that did not alter the sections applying to product standards<sup>4</sup>.
- In Connecticut, current session bill SB 863, as amended by comments from the state's energy office at a February 18, 2021 public hearing, includes the same product standards proposed in H 5966 (except for commercial ovens) and proposes an effective date of January 1, 2023<sup>5</sup>.
- In Vermont, standards for 13 of the 20 products included in H 5966 (as listed in § 39-27.1-5a) were adopted in 2018. Most of these standards went into effect July 1, 2020, with three products (faucets, showerheads, and urinals) going into effect July 1, 2021<sup>6</sup>.
- In New York, standards were adopted in 2019 and will go into effect January 1, 2022 for four products included in H 5966 (faucets, showerheads, toilets, and urinals)<sup>7</sup>. The state is expected to pursue additional standards beyond this subset of plumbing products.
- In New Jersey, current session bills A5160/S3324 include the same set of product standards as H 5966 (except for gas fireplaces) and propose an effective date of January 1, 2023<sup>8</sup>.
- Multi-state utilities supporting these standards strengthen this regional coalition – National Grid connects Rhode Island, Massachusetts, and New York, and Eversource Energy covers Massachusetts, Connecticut, and New Hampshire.

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<sup>3</sup> <https://malegislature.gov/Bills/192/S9/Amendments/Senate>

<sup>4</sup> <https://malegislature.gov/Bills/192/S13>

<sup>5</sup> <https://www.cga.ct.gov/2021/ETdata/Tmy/2021SB-00863-R000218-Dykes,%20Katie-Commissioner-DEEP-Efficiency%20Standards-TMY.PDF>

<sup>6</sup> <https://publicservice.vermont.gov/content/vt-appliance-efficiency>

<sup>7</sup> <https://www.nysenate.gov/legislation/bills/2019/a2286>

<sup>8</sup> [https://www.njleg.state.nj.us/2020/Bills/S3500/3324\\_I1.HTM](https://www.njleg.state.nj.us/2020/Bills/S3500/3324_I1.HTM)

National Grid's Comments on Bill H 5966

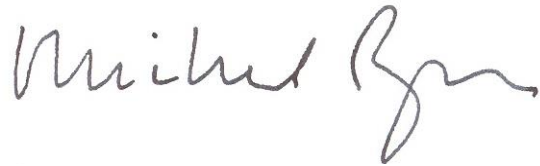
March 18, 2021

Page 3 of 3

Across the country, identical product standards to those included in H 5966 have already been adopted in California, Colorado, Hawaii, Nevada, Washington, and Washington D.C., as well as in New York and Vermont as noted above.

National Grid respectfully requests that you consider these comments when reviewing the Proposed Legislation. Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-7515.

Sincerely,

A handwritten signature in black ink that reads "Michael Ryan". The signature is written in a cursive style with a large, sweeping "R" and a long, horizontal tail.

Michael F. Ryan