

March 20, 2025

The Honorable Stephen M. Casey
Chairman, House Municipal Government & Housing Committee
Rhode Island State House
Providence, Rhode Island 02908

RE: H-5450 – Relating to Public Property and Works – All-Electric Building Act

Dear Chairman Casey:

On behalf of Rhode Island Energy, I write in **opposition** to H-5450, which would require all new commercial, residential, or mixed-use buildings to be all-electric after December 31, 2026. If advanced, **this bill could have a profound negative impact on energy affordability, customer choice, housing affordability, economic competitiveness, energy system reliability, and resource diversity**. We respectfully urge the Committee to reject this bill in its entirety.

Rhode Island Energy provides essential energy services to more than 770,000 customers across the state through the delivery of electricity and natural gas. Our team of 1,400 union and non-union employees is dedicated to helping Rhode Island customers and communities thrive, while supporting the transition to a cleaner energy future in a safe, reliable, and affordable manner.

The proposed Act has several critical flaws:

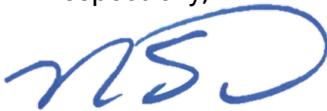
- **There has been no comprehensive cost/benefit analysis conducted** detailing how this policy would impact energy affordability, housing prices, and economic competitiveness across the Ocean State. A policy this sweeping should be grounded in comprehensive energy and financial analyses.
- To that point, **the legislation is not informed by analyses now underway designed to shed light on actionable, near-term steps and viable, long-term pathways for economy-wide decarbonization in a manner that serves all customer types in a safe, reliable, and affordable manner**. These include the Public Utilities Commission’s “Future of Gas” investigation¹ and the Executive Climate Change Coordinating Council’s (EC4) economy-wide analysis of “strategies, programs, and actions to meet economy-wide enforceable targets for greenhouse gas emissions reductions” – a report not due until December 31, 2025.

¹ The PUC’s “Future of Gas” investigation (Docket 22-01-NG) has been specifically established to examine “the extent to which the requirements of the Act [on Climate] impact the conduct, regulation, ratemaking, and the future of gas supply and gas distribution within Rhode Island.” The scope of that proceeding recognizes the need to create “a framework and, to the extent possible, a timeline for equitable implementation of necessary or beneficial actions under the PUC’s jurisdiction over the gas system specifically and/or public utilities generally.” And, it notes the need to “(i) identify necessary or beneficial actions that are beyond the PUC’s jurisdiction over the gas system specifically and/or public utilities generally.”

- **It is not technology and fuel neutral.**² Mandating all-electric buildings could have significant consequences for Rhode Island’s ability to meet its Act on Climate mandates, to serve heating demands reliably and cost-effectively across all economic sectors, and for the preservation of consumer choice. It may also stymie valuable opportunities for future innovation, investment, and job growth across the state’s economy.
- **It ignores consumer choice and fails to account for customer implications.** Customers will ultimately determine the scale and pace of Rhode Island’s transition toward a decarbonized society. Thus, customer education, decision-making, and acceptance of requirements and costs to support climate mandates are important elements before the state can realistically consider implementing such sweeping decarbonization strategies.
- It presumes that the electric grid will be prepared to support all-electric construction in all locations and at all times, but **it does not account for foundational system and grid modernization investments (which also have costs) vital to electric system reliability – now and into the future.**
- **It provides for consideration of energy affordability after establishing mandates on new construction, and only for low- and moderate-income customers in all-electric buildings.** Rhode Island Energy concurs that ensuring energy affordability is paramount for our most vulnerable populations, but also recognizes that this challenge extends to many other customers as well. We note that the legislation specifically *excludes* “financial considerations” as a sufficient basis to determine infeasibility of compliance.

Rhode Island Energy thanks the Committee for its consideration of these comments and respectfully asks that it oppose H-5450.

Respectfully,



Nicholas S. Ucci
Director of Government Affairs

CC: The Honorable Members of the House Municipal Government & Housing Committee
The Honorable Arthur Handy, Rhode Island House of Representatives

² “[F]or policy to support Rhode Island’s heating sector transformation, the next 10 years should not focus on advancing a single or limited set of solutions. Instead, Rhode Island should ensure that it is making progress, regardless of which solution (or mix of solutions) ultimately prevails.” See [Heating Sector Transformation in Rhode Island – Pathways to Decarbonization by 2050](#), prepared for the Rhode Island Office of Energy Resources and Rhode Island Division of Public Utilities & Carriers, by The Brattle Group.