

April 7, 2026

The Honorable Robert Britto
Chairman, Senate Commerce Committee
Rhode Island State House
Providence, Rhode Island 02908

RE: S-2012 – Relating to Public Utilities & Carriers – Transparency in Electric and Gas Bills Act

Dear Chairman Britto:

On behalf of Rhode Island Energy, I write regarding S-2012, which would require the state's electric and gas utilities to provide certain information relative to various components of utility bills.

Rhode Island Energy values the intent of this legislation, namely, to improve transparency and enhance customer understanding of the charges on their utility bills. In fact, our Company is actively contemplating alternative bill design templates, while being mindful of potential cost and billing system implications. In that vein, while we appreciate the leadership shown by Minority Whip Rogers and the bill's co-sponsors in introducing this legislation, Rhode Island Energy has several concerns regarding its implementation that warrant consideration.

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 1,300+ 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.

Respectfully, we note the following:


- **We agree that providing clearer information on major cost categories would improve transparency and benefit our customers. In fact, Rhode Island Energy is already moving in this direction without a statutory mandate, but notes that such changes will take time and necessitate incremental costs and resources (including substantial changes to our billing system).** Today, Rhode Island Energy's bill template includes a breakout of "supply" and "delivery" costs at the top of the first page in the form of a "doughnut" chart. Additional details on each of these components are included elsewhere in the bill, including embedded public policy and tax costs consistent with Rhode Island General Laws.
- While we appreciate and generally concur with the intent of this legislation, its specificity may present significant compliance challenges. For example, the proposed "breakdown of renewable energy mandates" (page 2, lines 22-30) would be extremely complex to convey on a monthly bill and our billing system software may not be capable of supporting this design feature. We note that information along these lines is already available through public reports, such as the Public Utilities Commission's (PUC) annual Renewable Energy Standard (RES) compliance reports and other regulatory filings. To this point – **S-2012 may be more effective if it established general requirements for utility bill design, leaving the specific approach and details to individual public utilities and state regulators.** This flexibility will help public utilities, like Rhode Island Energy, work within the constraints of

existing billing systems and strike the appropriate balance between transparency and costs.

- Furthermore, concerning the “itemization” of clean energy mandate costs, **it may be possible for relevant state agencies (such as the PUC, Division of Public Utilities and Carriers, or the Office of Energy Resources) to compile such data on an annual basis across all public utilities that operate within Rhode Island.** Such a report could be made available to the public and state policymakers in a transparent manner.
- Due to the complexity of our billing system and the need to design and test any new bill template, **Rhode Island Energy would not be able to meet the timelines established in this bill** (page 2, line 9).
- **Rhode Island Energy respectfully requests that language be added to the bill ensuring that a public utility company’s prudently incurred costs stemming from the implementation of this law are recoverable through appropriate regulatory mechanisms, subject to review by the PUC.**

In closing, Rhode Island Energy appreciates the intent of this legislation and looks forward to working with the Committee and bill sponsors to foster greater bill transparency while preserving sufficient flexibility to address important technological constraints and cost considerations.

Respectfully,



Nicholas S. Ucci
Director of Government Affairs

CC: The Honorable Members of the Senate Commerce Committee
The Honorable Gordon E. Rogers, Rhode Island Senate