

April 7, 2026

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

**RE: S-2074 – Relating to Public Utilities & Carriers – Regulatory Powers of Administration – Informational Notice on Electric Bills**

Dear Chairman Britto:

On behalf of Rhode Island Energy, I write regarding S-2074, which proposes amendments to Rhode Island General Laws § 39-3-37.3 pertaining to informational notices on electric 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. It is why our Company is actively contemplating alternative bill design templates, inclusive of visual illustrations, while being mindful of potential cost and billing system implications. In that vein, 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.

As indicated, Rhode Island Energy already has the ability to change the design of its billing templates; however, doing so requires a thorough examination not only of the implications for customer transparency, but also of operational costs and technical constraints (e.g., the limitations of our billing systems and software). For example, today, compliance costs associated with the Renewable Energy Standard (RES) – a state-mandated policy – are embedded in the supply portion of the electric bill. Our ability to segment those costs and incorporate them into a grouping of “ratepayer funded programs and policy” will require substantial effort. Even if successful, other complications exist, e.g., third-party electricity suppliers also bundle their RES compliance costs in supply rates, but we do not currently receive that information separately.

**For these reasons, we welcome the opportunity to work with the Committee and bill sponsors on practical amendments that can achieve our shared goal of improved transparency while avoiding technical inefficiencies and mitigating costs that may ultimately be borne by customers.** For example, clarifying that costs *may* be broken out into *no more than* four streamlined components (supply, distribution, transmission, and policy and tax), *where technically feasible to do so*, can provide the important flexibility needed for such an effort to be successful. Moreover, we respectfully recommend that the Division of Public Utilities and Carriers (DPUC) be *consulted* in any future bill re-design, with Company notification provided at least 30 days in advance of substantive changes going into effect. This provides electric distribution companies with vital operational discretion on final formatting pursuant to statutory guidance. Utility bill design is a critical tool for customer engagement, communication, and

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operational efficiency which can be optimally balanced by the company ultimately charged with delivering on all those fronts.

In closing, Rhode Island Energy appreciates the broad intent of this bill and welcomes the opportunity to collaborate with the bill's sponsors in the days ahead.

Thank you for your consideration of these comments.

Respectfully,

A handwritten signature in blue ink, appearing to be "NSU", written over a light blue circular scribble.

Nicholas S. Ucci  
Director of Government Affairs

CC: The Honorable Members of the Senate Commerce Committee  
The Honorable Frank A. Ciccone III, Majority Leader, Rhode Island Senate