

April 7, 2026

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

RE: S-2641 – Relating to Public Utilities & Carriers – Duties of Utilities & Carriers – Electric Utility Billing & Metering Standards

Dear Chairman Britto:

On behalf of Rhode Island Energy, I write in **opposition** to S-2641, which would establish new and overlapping mandates associated with electric utility billing and metering standards. While Rhode Island Energy is not opposed to much of the substance in the bill, we feel it is necessary to highlight that a significant portion of the prescribed standards already exist in regulation and note that the Division of Public Utilities and Carriers (DPUC) already has the authority to address these matters.

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 by delivering a high-quality customer experience and by working to control costs.

Rhode Island Energy already endeavors to minimize the use of estimated meter readings—**but this practice is necessary in certain circumstances, is widespread in the industry, and is not unique to Rhode Island Energy.** There are several reasons why a customer may have their energy consumption estimated. For instance, Rhode Island Energy uses estimates for connecting and disconnecting service (e.g., when a customer may need to transfer service during a move from one home to another). There may also be occasions, such as those involving severe weather, equipment failure, or failure to be granted access to a meter, when an estimated reading is necessary. This included the unprecedented COVID pandemic, during which many in-person businesses and services were locked down. To protect the safety and wellbeing of our employees and customers, manual meter reads for customers who had their utility meters located inside a home or business were paused.

Rhode Island Energy is now in the process of deploying Advanced Metering Functionality (AMF) across its electric service territory. This investment is intended to address key unmet needs in Rhode Island, including replacement of existing electric AMR meters, which are reaching the end of their design life, are obsolete, and will not scale. **AMF will also allow customer usage data to be sent directly to our billing systems and, in most cases, negate the need to manually access the meters themselves. This technology will improve transparency by enabling customers to see their own usage in near-real time and reduce instances in which estimates may need to be used.**

Rhode Island Energy has implemented protocols to keep our customers informed and mitigate the number of estimated bills and these efforts have been successful. For context, less than a

tenth of one percent of Rhode Island Energy customers are receiving estimated bills for a protracted period in excess of six months. For those customers receiving an estimated meter read, it is noted on their bills. At any time, if a customer believes the estimate is not accurate, they can call Rhode Island Energy's customer service team and request that a manual read be taken – and that read is usually conducted within one to three business days. Also, in those instances where a customer identifies an issue with an estimated read and/or associated billing reconciliation, Rhode Island Energy will work with them and the DPUC to resolve their concerns. On occasion, this includes testing the meter in place to ensure its accuracy. When a customer has received an estimated read for more than two months, a letter is sent asking them to call us so we can identify a path forward to eliminate the estimates and get an actual meter read. We will continue sending a letter each month until the situation is resolved.

The Division of Public Utilities and Carriers (DPUC) has established rules governing “Standards for Electric Utilities” (815-RICR-30-00-1), which include thorough requirements for electric meter reading, accuracy and testing. These standards already require that meters be read “at regular intervals.”¹ Specifically, these Electric standards address electric service provisions, quality of electric service, meter accuracy and testing, and many other aspects underpinning the safe and reliable delivery of energy services to our customers. S-2641 mirrors several of those existing provisions (including § 39-2-1.5(a)(1-3)). Although we do not oppose the concepts themselves, codifying them in statute will create confusion as between the statute and the regulations.

In conclusion, Rhode Island Energy is committed to transparent and accurate billing practices, but believes these matters are more effectively regulated by the DPUC (and Public Utilities Commission) and respectfully asks the Committee to oppose S-2641.

Thank you for your consideration.

Respectfully,



Nicholas S. Ucci
Director of Government Affairs

CC: The Honorable Members of the Senate Commerce Committee
The Honorable Samuel D. Zurier, Rhode Island Senate

¹ Electric Standards, 815-RICR-30-00-1.3(E)(3).