



**Department of Business Regulation  
Office of the Director**

1511 Pontiac Avenue, Cranston, RI 02920  
P: 401.462.9552 • F: 401.462.9532  
TTY: 711 • www.DBR.RI.gov



March 31, 2026

The Honorable Evan P. Shanley  
Chairperson, House Committee on State Government and Elections  
State House  
Providence, Rhode Island 02903

RE: S2769 - RELATING TO INSURANCE -- FIRE INSURANCE POLICIES AND RESERVES

Dear Chair Shanley:

I write on behalf of the Department of Business Regulation with concerns regarding S2769/H7860. This bill would make substantial changes to how homeowners' insurance works in Rhode Island and make Rhode Island an outlier in a number of ways. It will cause delays in claim processing in Rhode Island, and could lead to insurers deciding not to insure properties in Rhode Island in the future.

The bill as drafted adds a section of law in the Fire Insurance Policies and Reserves chapter. In subsection (e), this bill proposes changes that would require claimants to file a notarized form before the claim can be closed, meaning delays to a consumer receiving their money from a claim. In subsection (i) this law seems to authorize lawsuits by both private parties and the attorney general but does not address the exemption from insurance from the attorney general's authority. Subsection (g) seems to seek to require surplus lines carriers to send mandatory disclosure to consumers, which may not be allowable under the current licensing format. Subsection (j) appears to replicate already existing mandatory language from the standard fire insurance policy and the unfair trade practice act. And subsections (a) and (b) appear to replicate some existing protections that had been clear for policyholders (the right to invoke appraisal, the right to sue within 24-months) are explicitly extended to 'assignees.' The additional language seems intended to make clear that an assignee has the same protections as the policyholder of the insurance contract. The Department notes that this remains an open question in a number of ongoing court cases.

We would be happy to meet with the Committee and/or sponsors to discuss this bill further. Please do not hesitate to contact me at Elizabeth.dwyer@dbr.ri.gov or 401.462.9615 (office) or 401.578.6653 (mobile) with any questions or for additional information.

Thank you for your consideration of our position on this proposed legislation.

Sincerely,

Elizabeth Kelleher Dwyer, Esq.  
Director, Department of Business Regulation

cc: Honorable Members of the House Committee on State Government and Elections  
Honorable Jason Knight  
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House