



April 15, 2026

The Honorable Susan Sosnowski, Chairwoman
Senate Environment and Agriculture Committee
State House
Providence, RI 02903

Re: S.2218, An Act Relating to Health and Safety – Building Performance Standards Act of 2026

Dear Chairwoman Sosnowski:

The undersigned members of the Rhode Island Business Coalition are writing to express opposition to Senate Bill 2218 which would establish statewide energy-efficiency requirements for certain buildings across our state.

S.2218 would establish a statewide program requiring buildings with more than 25,000 square feet to meet energy-efficiency and greenhouse-gas reduction standards in order to help the state achieve net-zero emissions by 2050 under the Act on Climate.

In 2021, the General Assembly passed the Act on Climate, charging the Executive Climate Change Coordinating Council (EC4) with developing a plan for reaching the mandatory greenhouse gas emissions targets outlined in the Act. In addition, in 2024 the General Assembly tasked the EC4 with recommending approaches to implementing energy benchmarking and performance standards for large public and private buildings. In its final report issued on February 10 of last year, the EC4 highlights several issues the Coalition believes are important when considering these bills.

Among the issues the report raises are the following:

- There is no comprehensive database of large buildings or their current energy sources in the state, and creating such a database of covered buildings would be a time-intensive process.
- The lack of both data on large buildings and infrastructure for automated energy-use reporting prevents the effective evaluation and implementation of statewide benchmarking and performance standards for large municipal and private buildings.
- In contrast, a program applying to certain large state-owned and state-occupied buildings does not hinge on the availability of such data and infrastructure. OER finds that such a program applying to only large state-owned and state-occupied buildings could be implemented beginning as soon as FY26 with just one additional full-time employee.

Based on the above findings as well as several additional factors outlined in its report, the EC4 report recommends the Office of Energy Resources (OER) “focus on leading a program for certain large state-owned

The Rhode Island Business Coalition represents 50 industries and 6,280 businesses that employ 231,200 people throughout Rhode Island.

and state-occupied buildings that would lay the foundation for future expansion to large municipal and private buildings”.

The Coalition recommends following the recommendations of the EC4 report on Building Energy Benchmarking and Performance Standards prior to moving forward with additional statewide reporting and enforcement requirements.

Thank you for your consideration of our position on S.2218.

Sincerely,

David Chenevert, Chairman, Rhode Island Business Coalition

Associated Builders and Contractors – Rhode Island Chapter

Association of Independent Colleges and Universities of Rhode Island

East Greenwich Chamber of Commerce

Greater Newport Chamber of Commerce

National Federation of Independent Business

Propane Gas Association of New England

Rhode Island Bankers Association

Rhode Island Builders Association

Rhode Island Small Business Economic Summit Regulations Committee

Rhode Island Small Business Summit Tax and Budget Committee

Rhode Island Staffing Association

cc. Senate Environment and Agriculture Committee