



Via Electronic Mail

April 15, 2026

The Honorable V. Susan Sosnowski
Chair, Senate Committee on Environment and Agriculture
Senate Lounge, State Senate
Providence, RI 02903

RE: CLF **Supports** Senate Bill No. 2218 – The Building Performance Standards Act of 2026

Dear Chair Sosnowski:

Thank you for the opportunity to provide testimony on Senate Bill No. 2218, the Building Performance Standards Act of 2026. S-2218 would reduce greenhouse gas (“GHG”) emissions from the heating of homes and businesses by requiring the establishment of a standard for the energy performance of existing large buildings in the state. Conservation Law Foundation (“CLF”) enthusiastically supports this bill and wishes to thank its sponsors for their attention to this important issue.

CLF is a member-supported non-profit environmental advocacy organization working throughout New England to counter climate change, restore the health of our oceans, embolden new energy infrastructure, and safeguard health, quality of life, and economic prosperity for future generations. We are working to cut emissions from the heating sector, and push for affordable and equitable heating policies in Rhode Island and across New England.

In Rhode Island, the heating of homes and businesses, including associated leaks from the gas distribution system, accounts for approximately 29% of statewide GHG emissions.¹ This figure does not include industrial heating and processes (another 10% of state emissions), and likely underestimates emissions associated with the gas distribution system.² Decarbonizing the heating of Rhode Island’s homes and businesses is thus a large and important part of achieving the mandates of the Act on Climate, which requires GHG emissions reductions of 45% below 1990 levels by 2030, 80% by 2040, and net-zero emissions by 2050.³

¹ R.I. Dep’t of Env’tl. Mgmt., *2023 Rhode Island Greenhouse Gas Emissions Inventory* (Nov. 2025), available at <https://dem.ri.gov/sites/g/files/xkgbur861/files/2025-11/RIDEM-ghg-inventory-2023.pdf>.

² See Stockholm Env’tl. Inst. & Brown Univ. Climate and Dev. Lab, *Deeper Decarbonization in the Ocean State: The 2019 Rhode Island Greenhouse Gas Reduction Study 20–23* (2019), available at <https://www.sei.org/wp-content/uploads/2019/09/deeper-decarbonization-in-the-ocean-state.pdf>.

³ R.I. Gen. Laws § 42-6.2-2.

In addition to the significant climate impacts of fossil fuel heating and appliances, reliance on these technologies has an adverse impact on indoor air quality, including the release of NO₂—a respiratory irritant that results in asthma, coughing, trouble breathing, and other respiratory symptoms.⁴

While Rhode Island has enacted significant new policies designed to decarbonize Rhode Island’s electricity and transportation sectors—including requiring 100% renewable electricity by 2033⁵ and adopting stricter vehicle emissions standards⁶—the heating sector has received comparably little attention since the passage of the Act on Climate in 2021.

S-2218 will reduce emissions from the heating of homes and businesses by requiring the Office of Energy Resources (“OER”) to create a building performance standard for large buildings to reduce emissions in line with the Act on Climate. Covered buildings will be required to reduce their energy usage and emissions incrementally over time. The bill contains exemptions for certain commercial and industrial uses.

The policies advanced by S-2218 are consistent with the Executive Climate Change Coordinating Council’s (“EC4”) 2025 Climate Action Strategy, which discusses a building performance standard as an important potential policy tool for reducing building sector emissions. Based on modeling done while developing the strategy, the EC4 says that a building performance standard could “contributing meaningfully to the state’s Act on Climate targets.”⁷

S-2218 won’t solve the problem of GHG emissions from building heating all at once, but it is a meaningful step we can and should take this year. Addressing the climate crisis, and doing so in a way that minimizes costs and other impacts to Rhode Islanders, is a complicated policy challenge. The more we delay action the harder it becomes. Conversely, proactively addressing the challenge will put Rhode Island in position to achieve the mandates of the Act on Climate and help to prevent the worst impacts of the climate crisis.

The time has come to take meaningful action to decarbonize Rhode Island’s heating sector. CLF therefore respectfully urges passage of S-2218. We also ask that you support S-2260, which will enable the tracking and collection of building energy usage data that would inform the development of a building performance standard.

Thank you for your time and consideration of these comments.

⁴ Eric D. Lebel et al., *Methane and NO_x Emissions from Natural Gas Stoves, Cooktops, and Ovens in Residential Homes*, 56 *Envtl. Sci. & Tech.* 2529 (2022), at C, I, available at <https://pubs.acs.org/doi/10.1021/acs.est.1c04707>.

⁵ See R.I. Gen. Laws § 39-26-4.

⁶ See 250 R.I. Code R. 120-05-37.

⁷ R.I. Exec. Climate Change Coordinating Council, *Rhode Island 2025 Climate Action Strategy* 105 (2025), available at <https://climatechange.ri.gov/media/2221/download?language=en>.



Sincerely,

A handwritten signature in blue ink, appearing to read "James Crowley".

James Crowley
Staff Attorney, Rhode Island
Conservation Law Foundation

cc: Members of the Senate Committee on Environment and Agriculture
Darrèl Brown, Vice President for Rhode Island, CLF