



Senator V. Susan Sosnowski, Chair
Senate Environment & Agriculture Committee
Rhode Island Senate

April 15th, 2026

RE: Green Energy Consumers Alliance Supports Senate Bill S2218

Dear Chair Sosnowski and members of the Committee,

On behalf of Green Energy Consumers Alliance and our thousands of members across Rhode Island, **I write in strong support of Senate Bill 2218** which would direct the Office of Energy Resources to create a building performance standards program for large buildings to reduce their emissions. Two sessions ago the Senate took action and passed this bill when it was part of the Building Decarbonization Act, and we hope the Senate recognizes the importance of this legislation again, passing it out of Committee and through a full floor vote.

Rhode Island Is Not on Track to Achieve Act on Climate Goals

The Act on Climate mandates that Rhode Island reduce its total greenhouse gas (GHG) emissions 45% by 2030 and net zero by 2050. However, the Executive Climate Change Coordinating Council's (EC4's) 2022 plan to meet the Act on Climate shows that the state would only achieve 40% emissions reductions by 2030, and that's if everything in the plan gets implemented. Notably, the 2025 [Building Benchmarking and Performance Standards report](#) required by Joint Resolution 7617 Substitute A depicts buildings as contributing 49% of Rhode Island's 2022 Gross Greenhouse Gas Emissions when including both Scope 1 and Scope 2 emissions, as shown in the image below. Rhode Island still lacks a policy to address emissions from our large existing buildings and cannot make progress towards driving down these emissions without the standards that would be created by the Building Performance Standards Act.

APPENDIX 1: SUPPLEMENTAL TABLES AND FIGURES

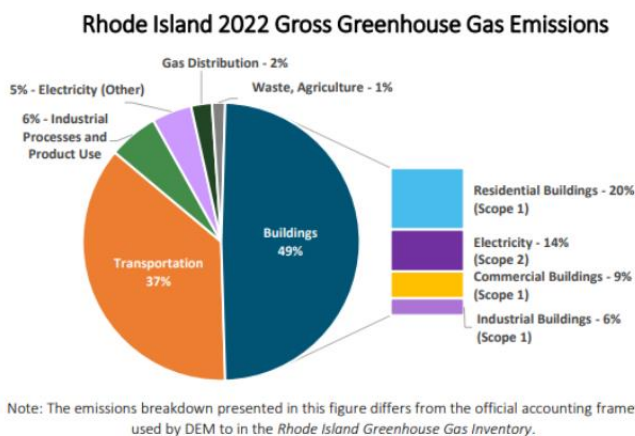


Figure 4: Rhode Island Gross Greenhouse Gas Emissions Breakdown, 2022³⁷

Figure 1: Executive Climate Change Coordinating Council report: *Building Energy Benchmarking and Performance Standards*, p. 28.

This bill would tackle emissions from large existing buildings by requiring the Office of Energy Resources to set emissions-based performance standards for property types by 2028. These targets would be set on a trajectory that ensures buildings reach net-zero emissions by 2050, with interim 5-year targets for owners to comply with. Building policy experts also recommend performance standards for many reasons including:

- The gradual phase-in of requirements.
- No requirement for specific emissions reductions choices to be made by building owners.
- Performance standards address the landlord-tenant split incentive for energy efficiency improvements.

Building Performance Standards are Consistent with the 2025 Climate Action Strategy

Developing building performance standards (BPS) is consistent with policy analysis done for the 2025 Climate Action Strategy (CAS) on additional measures the state can undertake to reduce emissions and comply with the Act on Climate. In the technical appendix for the CAS, building decarbonization has the potential to reduce emissions by 5,500 ktCO₂e, when evaluating the impact of BPS's and government building decarbonization.

Table 20: Building Sector Emissions Reductions by Strategy (ktCO2e)

Strategy	2030	2040	2050	Cumulative
All Electric New Construction	10	40	50	800
Maintain & Adjust State Energy Efficiency Incentives	20	60	100	1,400
Pre-Weatherization + Whole Home Electrification	40	90	110	1,900
Government Building Decarbonization	50	100	80	2,000
Building Performance Standards	30	180	260	3,500
Heat Pump Accelerator (E3 estimate of Market Hub)	50	110	130	2,300
Heat Pump Accelerator (NEEP estimate of Market Hub + Innovation Hub)	170	380	440	7,800
Clean Heat Standard	200	1,110	1,840	23,300

Figure 2: Rhode Island 2025 Climate Action Strategy Technical Appendix, p. 64.

Funding to help building owners meet a performance standard can be accessed through state and federal programs like ones offered by Rhode Island Infrastructure Bank, Rhode Island Energy, and select U.S. Department of Energy programs. The use of a building performance standard fund, as would be created by this bill, would also be a source of funding for building improvements.

Health Benefits of Reducing Emissions from Buildings

In addition to the emissions reductions potential of developing and enforcing performance standards, there are public and personal health benefits that are realized as a result of removing fossil fuel-burning appliances from a building. Improved ventilation and electric appliances will lead to a reduction in indoor and outdoor air pollution, decreasing the risk of respiratory issues like asthma and allergies. As building owners comply with their performance standard, they can see cost savings from investments, and improvements in the health and safety of their property.

Inclusion of S2218 into H7127 Article 3 Section 16

Green Energy Consumers Alliance would like to thank the Governor for including a state facilities benchmarking and performance standards program in the FY 2027 Budget. We are in support of this program and advocated for it at the associated Senate Finance Committee hearing. However, we feel that Rhode Island can and must do more to address emissions from large buildings in the state, not just from state-owned and state-operated

facilities or via a voluntary program. Therefore, we also advocate for S2218 to be incorporated into H7127 Article 3 Section 16 to create a more comprehensive building benchmarking and performance standards program.

To achieve the requirements of the Act on Climate, we must implement larger policies that will reduce emissions from the building sector. The Building Performance Standards Act of 2026 is critical to ensure our largest buildings are reducing their energy usage and emissions.

Green Energy Consumers Alliance thanks Senator Kallman for introducing this bill and urges the Committee and full General Assembly to vote in favor of its passage.

Sincerely,

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