



*Distinctive Communities
Powerful Alliance*

April 15, 2026

The Honorable V. Susan Sosnowski, Chair
Senate Environment and Agriculture Committee
Rhode Island Senate
82 Smith Street
Providence, RI 02903

RE: SENATE BILL 2218 – AN ACT RELATING TO HEALTH AND SAFETY-- BUILDING PERFORMANCE STANDARDS ACT OF 2026

Chair Sosnowski and Honorable Committee Members,

On behalf of the Rhode Island League of Cities and Towns, we write to express concerns regarding Senate Bill 2218, which would direct the Rhode Island Office of Energy Resources to develop and implement building performance standards for large buildings in Rhode Island in order to reduce greenhouse gas emissions consistent with the Act on Climate.

At the outset, the League would like to acknowledge and appreciate the intent of the legislation. Rhode Island's municipalities share the goal of reducing greenhouse gas emissions and recognize the importance of improving building efficiency as part of the broader effort to meet the state's long-term climate commitments. Local governments across the state have demonstrated leadership through energy efficiency initiatives, municipal energy planning, and participation in state and utility programs designed to lower emissions and improve building performance.

However, we are concerned that the structure and implementation of Senate Bill 2218 may create unintended impacts for municipalities and local taxpayers. As drafted, the legislation could apply to municipally owned facilities exceeding 25,000 square feet, which may include schools, public safety buildings, administrative facilities, and other essential public infrastructure. Many of these buildings are aging facilities that serve critical community functions and may require substantial capital investment to meet new performance standards.

While the bill provides authority for the Office of Energy Resources to establish metrics, timelines, and enforcement mechanisms, municipalities may ultimately face compliance requirements, reporting obligations, and potential penalties without a clearly defined funding or technical assistance framework sufficient to support these upgrades. For local governments already managing constrained budgets and competing service demands, the cost of major building retrofits or performance improvements could place significant pressure on municipal finances and local property taxpayers.

The League believes the policy objective of improving building performance would be better addressed through a collaborative and supportive approach that prioritizes technical assistance, flexible compliance pathways, and dedicated financial resources for municipal facilities. For example, voluntary benchmarking and efficiency programs paired with state-supported technical and financial assistance have proven to be effective models for advancing energy goals while recognizing the fiscal realities facing local governments.

Additionally, municipalities should have a formal role in the development of performance standards that could affect public facilities, ensuring that local operational needs, facility conditions, and capital planning cycles are fully considered during implementation.

For these reasons, while we support the broader goals of reducing emissions and improving building efficiency, the Rhode Island League of Cities and Towns respectfully urges the General Assembly to carefully consider the unintended impacts this legislation may have on municipal buildings and local taxpayers and to explore alternative approaches that provide municipalities with the tools, resources, and flexibility necessary to achieve these shared environmental objectives.

The League stands ready to work with the bill sponsors, the Rhode Island Office of Energy Resources, and members of the General Assembly to identify constructive solutions that advance Rhode Island's climate goals while ensuring that municipalities can continue to provide essential services to their residents.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Rossi', written in a cursive style.

Randy R. Rossi
Executive Director

Cc: Honorable Members of Senate Environment and Agriculture Committee