

May 19, 2026

The Honorable V. Susan Sosnowski  
Chairwoman, Senate Environment & Agriculture Committee  
Rhode Island State House  
Providence, Rhode Island 02908

**RE: S-2655 – Relating to Public Utilities & Carriers – Electric Transmission Siting & Regulatory Act**

Dear Chairwoman Sosnowski:

On behalf of Rhode Island Energy, I write in **opposition** to S-2655. We truly appreciate the Senate’s leadership on issues pertaining to energy affordability and system reliability, as well as the Committee’s role in vetting new energy policy proposals. In this instance, however, we believe the proposed legislation is a solution in search of a problem, largely driven by a false notion that our Company’s infrastructure investment proposals do not receive stringent regulatory scrutiny and that Rhode Island Energy is not incentivized to invest in one set of infrastructure over another. Respectfully, these perspectives are uninformed and ignore the following:

- **Substantial engineering and cost assessment underline every capital investment proposal made by our Company - proposals which are then subject to multiple levels of regulatory review by (and evidentiary hearings before) expert state agencies and intervening stakeholders;**
- **Rhode Island Energy is already making prudent investments in “grid edge technologies” under existing law and regulatory paradigms where such solutions can meet reliability standards at a reasonable cost to customers;**
- Rhode Island Energy’s strategic approach to grid resiliency and modernization – *leveraging both “traditional” and “grid edge” investments* – is delivering **some of the strongest electric reliability in Company history**; and
- Rhode Island Energy is already engaged with ISO New England, other utilities, and the broader stakeholder community to establish **more thorough review of transmission asset management projects at the regional level.**

Furthermore, while this bill identifies “electric transmission” in its title, **its subcomponents meld together the interstate transmission and local distribution systems – each regulated at different levels of government** (one federal-jurisdictional, the other state-jurisdictional). Finally, **the bill includes technical deficiencies and is duplicative of existing law, regulatory oversight, and agency rules.** For these reasons, we respectfully ask that the Committee oppose this bill.

Rhode Island Energy provides essential energy services to more than 770,000 customers across the Ocean State through the delivery of electricity and natural gas. Our team of 1,300+ union and non-union employees is dedicated to helping Rhode Island customers and communities thrive, while supporting the transition to a cleaner energy future in a safe, reliable, and affordable manner.

Despite what some stakeholders may convey to the Committee, **Rhode Island Energy is actively proposing and implementing critical investments in advanced or “grid-edge” technologies under existing law and regulatory processes.** Acadia Center, for instance, has claimed that the state’s public utilities are not

adequately considering these solutions in the grid planning process and “are not incentivized to invest in operational, lower-cost, more efficient alternatives.”<sup>1</sup> Respectfully, this opinion is divorced from reality.

Since Rhode Island Energy arrived on scene, we have installed 116 “**smart switches**” to isolate damage and reroute power that has aided customer restoration efforts. We are now ~50% complete with **smart meter (AMF)** deployment across the state, which is helping us detect and respond to outages faster, and giving customers greater insight into their energy consumption. Also, we are modernizing transmission infrastructure – the backbone of the grid – by replacing aging wood poles with more resilient steel while being a leader in New England by adding **advanced dynamic line rating sensors** to maximize capacity across the high-voltage system.

**The results are clear – Rhode Island Energy’s approach to grid resiliency and modernization is paying dividends for the state and its customers. Recent years have witnessed some of the strongest reliability in company history – driven by sustained investments, maintenance, and storm hardening.** This past February, following Blizzard Hernando’s historic impact on our state, Rhode Island Energy restored 99% of customer outages within 48-hours – a response that far outpaced our neighbors. We rank in the top 20% nationally for lowest outage frequency and are best in the Northeast for shortest outage duration. Moreover, since 2022, transmission interruptions have decreased by 20%. **Credit goes not only to our hardworking union and non-union utility professionals, but also to Rhode Island Energy’s investment strategy that is inclusive of both “traditional” infrastructure solutions and “grid-edge technologies” when economic and capable of meeting stringent state and federal reliability mandates. All these investments are subject to rigorous oversight by the Public Utilities Commission (PUC) and Division of Public Utilities and Carriers (DPUC).**

One of the benefits of that regulation is that stakeholders, if not satisfied with investments now driving some of the strongest electric reliability Rhode Island has ever seen, may petition to intervene, examine, issue discovery, and provide their own expert witness testimony. **Utilization of this existing pathway would avoid the need to establish static infrastructure and engineering requirements that could inadvertently constrain our ability to appropriately manage highly complex and dynamic energy systems.**

As noted, the proposed bill also includes some technical deficiencies. For example:

- Page 3, lines 15-17: the proposed definition of “advanced conductor” is overly restrictive. **A statute that locks the utility into a quantifiable impedance reduction threshold may reduce the portfolio of conductor options that can be considered or supported in project development.** Also, it raises a level of uncertainty as to what baseline that impedance reduction would be measured against.
- Page 4, lines 20-21: the proposed definition of “reconductoring” is unnecessary and inconsistent with industry terminology. “Reconductoring” generally means replacement of an existing conductor whether the new wire is “advanced” or not.

Importantly, **existing state law and EFSB rules<sup>2</sup> already account for many of the provisions included in this bill.** For example:

- Page 5, lines 5-10: the EFSB, as a state entity, is *already* required by state law to address impacts on climate change pursuant to RIGL §42-6.2-8. Moreover, at RIGL §42-98-11(b)(3), the EFSB is

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<sup>1</sup> Acadia Center Testimony in Support of House Bill 5573, April 1, 2025.

<sup>2</sup> 445-RICR-00-00-1.

required to determine that a proposed energy facility “will not cause unacceptable harm to the environment and will enhance the socio-economic fabric of the state.”

- Page 6, lines 1-5: likewise, pursuant to RIGL §42-98-8(a)(7), applicants are *already* required to provide a “study of alternatives to the proposed facility, including alternatives as to energy sources, methods of energy production, and *sites* for the facility, together with reasons for the applicant’s rejection of these alternatives.” [emphasis added]. Also, this section of the bill includes language regarding expedited review for transmission lines. EFSB Rule 1.6 *already* allows this.
- Page 6, lines 6-13: General Laws *already* provide for a needs assessment of newly proposed energy facilities. RIGL §42-98-9(d) states, “The public utilities commission shall conduct an investigation in which the division of planning of the department of administration, the governor’s office of energy assistance, and the division of public utilities and carriers shall participate and render an advisory opinion as to the *need for the proposed facility*.” [emphasis added].
- Page 1, lines 6-7: this proposed amendment is redundant of authority *already* granted to the EFSB by statute.

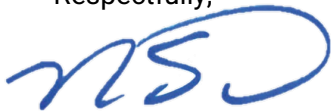
Finally, **this bill ignores the fact that ISO New England and the region’s utilities, including Rhode Island Energy, have been engaged in good-faith efforts to establish a regional Asset Condition Reviewer at ISO New England by January 2027**, which will:

- include detailed, independent evaluation of regional transmission asset condition projects and practices;
- increase stakeholder transparency and engagement; and
- enable long-term cost savings through co-optimization of current asset management strategies with other regional system planning processes.

For all these reasons, Rhode Island Energy respectfully requests that the Committee oppose this bill.

Thank you for your consideration of these comments.

Respectfully,



Nicholas S. Ucci  
Director of Government Affairs

CC: The Honorable Members of the Senate Environment & Agriculture Committee  
The Honorable Robert Britto, Rhode Island Senate