



May 30, 2024

The Honorable David A. Bennett
House Environment and Natural Resources Committee
Rhode Island State House
82 Smith St.
Providence RI, 02903

RE: Bill Number: 7617 AN ACT RELATING TO HEALTH AND SAFETY -- BUILDING DECARBONIZATION ACT OF 2024

Dear Chairman Bennett and Honorable Members of the House Environment and Natural Resources Committee:

I am writing to express our concerns regarding House Bill 7617. We appreciate and support the bill's goal to establish a program for energy and water benchmarking of large buildings in Rhode Island and to set standards for their energy performance. We also commend the intent to ensure the Office of Energy Resources has the necessary resources to administer its responsibilities effectively in pursuit of Rhode Island's net-zero mandate.

However, we have concerns about the possible impact this legislation, as currently drafted, may have on municipalities. Specifically, we are concerned by the potential for unfunded mandates to be imposed on cities and towns, which are already facing budgetary constraints. It is imperative that any new requirements do not exacerbate the financial challenges our municipalities are experiencing.

We are particularly concerned with the following sections of the bill:

1. 23-27.3-130.2. Requirement for Electric-Ready Construction of New Buildings: This section stipulates that no city or town shall issue a permit for the new construction or alteration of any residential building unless it meets certain electric-ready standards. This requirement could impose additional costs on local governments and developers, potentially leading to increased permit processing times and further financial strain on municipal budgets.
2. 23-27.5-5. Municipal Implementation of Building Energy Benchmarking Requirements: Mandating municipalities to implement and oversee energy benchmarking for large buildings without providing adequate funding or resources could place an undue burden on local governments. This unfunded mandate could lead to significant administrative and financial challenges.

Additionally, we are concerned about the possible unintended consequence of shifting additional costs to other ratepayers. While the bill aims to promote energy efficiency and sustainability, it is crucial to ensure that the implementation does not result in increased financial burdens on residents and businesses who are not directly benefiting from these measures.

Thank you for considering our concerns. We look forward to working together to refine this legislation to better serve the needs of Rhode Island's communities.

On behalf of the League of Cities and Towns, thank you for considering our testimony.

Sincerely,

A handwritten signature in black ink that reads "David M. Bodah".

David M. Bodah
Associate Director

Cc: House Environment and Natural Resources
Representative Rebecca Kislak
Nicole McCarty, Chief Legal Counsel
Ernie Almonte, Executive Director, RILCT