



Via Electronic Mail

February 6, 2025

The Honorable David A. Bennett
Chair, House Committee on Environment and Natural Resources
Room 101, State House
Providence, RI 02903

RE: CLF **Supports** House Bill No. 5167 – The Rhode Island Clean Heat Standard Act

Dear Chair Bennett:

Thank you for the opportunity to provide testimony on House Bill No. 5167, the Rhode Island Clean Heat Standard Act. H-5167 would reduce greenhouse gas (“GHG”) emissions from the state’s building heating sector by creating a Clean Heat Standard—a performance standard that requires heating suppliers such as gas utilities and oil and propane dealers to provide customers with gradually increasing percentages of clean heat services. Conservation Law Foundation (“CLF”) 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 to push for affordable and equitable heating policies in Rhode Island and across New England.

In Rhode Island, residential, commercial, and industrial heating, including associated leaks from the gas distribution system, accounts for approximately 40% of statewide GHG emissions.¹ This figure likely underestimates emissions associated with the gas distribution system.² Decarbonizing the heating of Rhode Island’s homes, businesses, and industry is thus a large and important part of achieving the requirements of the Act on Climate, which requires GHG

¹ R.I. Dep’t of Env’tl. Mgmt., *2022 Rhode Island Greenhouse Gas Inventory* 6 (Dec. 2024), available at https://dem.ri.gov/sites/g/files/xkgbur861/files/2024-12/ghg-inventory-2022-f_1.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>.

emissions reductions of 45% below 1990 levels by 2030, 80% by 2040, and net-zero emissions by 2050.³

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 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.

H-5167 will reduce heating sector emissions by establishing a Clean Heat Standard, which is a performance standard that requires heating suppliers to provide customers with gradually increasing percentages of clean heat services, phasing out the sale of fossil fuels. These providers would be required to obtain a certain amount of Clean Heat Credits, which would be generated by deploying clean heat measures such as heat pumps, clean district energy, weatherization, and other verified low-carbon options. Over time, the number of credits each heating provider would be required to obtain would increase in line with the Act on Climate’s GHG reduction mandates.

A Clean Heat Standard is a mandate on the heating suppliers who sell gas, oil, or propane. It does not require homeowners or businesses to make any particular clean heat choices. A well-designed Clean Heat Standard can evenly distribute the expenses of the building decarbonization transition between now and 2050 and serve as a crucial funding source to complement existing energy efficiency and electrification initiatives.

The policies advanced by H-5167 are consistent with the Executive Climate Change Coordinating Council’s (“EC4”) 2022 update to the state climate plan, which recommends pursuit of energy efficiency and heating electrification, and specifically recommends that the state begin developing a renewable thermal standard.⁷

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

³ R.I. Gen. Laws § 42-6.2-2.

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 2022 Climate Update* 79-85 (2022), available at <https://climatechange.ri.gov/media/1261/download?language=en>.



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 H-5167.

Thank you for your time and consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "James Crowley", is written in a cursive style.

James Crowley
Senior Attorney
CLF Rhode Island

cc: Members of the House Committee on Environment and Natural Resources
Darrèll Brown, Vice President for Rhode Island, CLF