



February 6, 2025

The Honorable David A. Bennett  
Chairman  
House Committee on Environment and Natural Resources  
82 Smith Street  
Providence, Rhode Island 02903

**RE: H 5167 An Act Relating to Health and Safety – The Rhode Island Clean Heat Standard Act**

Dear Chairman Bennett,


Thank you for providing the Department of Environmental Management (DEM) and the Office of Energy Resources (OER; collectively, the “agencies”) the opportunity to comment on H 5167, which proposes the establishment of a clean heat standard in Rhode Island.

H 5167 directs the Executive Climate Change Coordinating Council (EC4) to implement a clean heat standard, which is in essence a cap-and-trade program intending to reduce greenhouse gas emissions from the heating (thermal) sector. We note that the EC4 consists of the directors of state and quasi-public agencies most involved with efforts to address climate change, but does not have the authority to promulgate regulations, does not have its own committed staff, and has very limited funding to utilize to support this work. We do not believe that the EC4 is the appropriate entity in state government for the program to be housed. Efforts like this one which are related to the state’s response to climate change need to be assigned to individual agencies with the authority to implement them, preferably with review and concurrence of the EC4 to ensure consistency with Rhode Island’s climate plans. Furthermore, we note that the implementation of such a program would constitute a significant effort which would likely require the provision of additional resources.

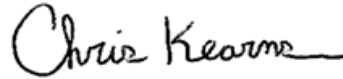
The Act on Climate (R.I. Gen. Laws § 42-6.2), signed into law by Governor McKee in 2021, directs the EC4 to complete plans every five years outlining the strategies, programs, and actions necessary to meet the greenhouse gas emissions reduction mandates included in the same law. The first plan is due no later than December 31, 2025, and the EC4 began the stakeholder engagement process earlier this year. Throughout 2025, the EC4 will hold public meetings to inform the development of the plan and the agencies urge stakeholders to consider providing feedback through that process. The final plan will include detailed modeling of the state’s greenhouse gas emissions trajectory which may be useful in assessing the desirability of adopting a clean heat standard.

We appreciate the opportunity to offer comments on this legislation and would be pleased to work with you to address the issues raised in this letter. Please feel free to contact Ryan Mulcahey, DEM Director of Legislative Affairs, at [ryan.mulcahey@dem.ri.gov](mailto:ryan.mulcahey@dem.ri.gov) and Karen Bradbury, OER Administrator of Energy Legislation & Programs, at [karen.bradbury@energy.ri.gov](mailto:karen.bradbury@energy.ri.gov) should you have any additional questions or wish to discuss this matter further.

Sincerely,



Terrence Gray, P.E.  
Director  
Department of Environmental Management



Christopher Kearns  
Acting Energy Commissioner  
Office of Energy Resources

cc: Members of the House Committee on Environment and Natural Resources  
The Honorable Terri Cortvriend  
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House  
Lynne Urbani, House Policy Director