



Advancing the Clean Energy Future

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Senate Environment and Agriculture
Rhode Island State House
82 Smith Street
Providence, RI 02903

Acadia Center Feedback on S2543 State Purchases – Lead by Example Act

Dear Chairperson DiMario and members of the Senate Environment and Agriculture Committee:

Acadia Center appreciates the opportunity to provide testimony on Senate Bill S2543. Acadia Center is a non-profit research and advocacy organization committed to advancing the clean energy future. We applaud and broadly support the efforts of the General Assembly to ensure that state purchases lead by example in waste reduction, electric vehicles and renewable energy and efficient technologies. Given Acadia Center's focus on climate and clean energy, we will focus our comments on Section 37-2-85 regarding the state's purchase of renewable and energy efficient technologies.

While the section mentions both the renovation or repair of existing state property and the construction of new buildings, the minimum threshold and scale of investments in energy efficiency or renewable energy is unspecified. Acadia Center recommends that standards for energy efficient technologies be explicitly referenced and/or that the State's Office of Energy Resources (OER) be granted the authority to set standards with feedback from stakeholders. Examples could include ENERGY STAR certification or alignment with the efficiency standards of utility or state incentive programs. Standards exist for each of the energy efficient systems listed, and without specifications, the state may opt for any marketed definition of 'energy efficiency'. For example, air conditioning systems should not be installed when air source heat pumps offer far improved efficiency in addition to heating. Further, the state should collaborate with OER to set explicit targets for renewable energy capacity to be sited on ideal state sites and/or to otherwise source clean, local electricity for state-owned properties. These efforts would significantly expand the scope and services of OER's Lead by Example program and team, and would require additional funding and staff capacity.

We applaud the directive that the Department of Administration's Capital Asset Management Division reduce overall site energy use intensity (EUI) from a 2014 baseline at all state-owned buildings. However, we would flag that the calculation of EUI, which divides the total energy consumed by a building in one year by the total gross floor area of the building, requires the basic task of benchmarking the energy usage of all state-owned buildings. Establishing a 2014 baseline requires tracking each building's energy data usage back to that year in order to calculate reductions in energy usage in future years; it will require additional capacity for the energy management of all state-owned buildings. Acadia Center strongly supports benchmarking – by tracking energy usage and building performance, building owners can lower energy costs and chart a path toward investing in energy efficiency and electrification. In fact, benchmarking is a core facet of House Bill 7617, the Building Decarbonization Act of 2024. In order to manage the capacity requirements of benchmarking and to seek the greatest impact on emissions, the act targets the largest buildings in the state – in the first year, reporting requirements would apply only to public buildings larger than 25,000 square feet.

Acadia Center would look forward to further collaboration with the sponsors of S2543, the RI Division of Purchases, the Capital Asset Division, and the facility managers of each state facility, who would be tasked with implementing these important shifts in the state's operations and purchases.

Sincerely,

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