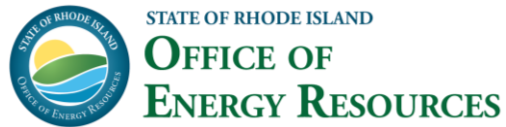


**SENATE RESOLUTION 1161**

**OFFICE OF ENERGY RESOURCES REPORT ON**

**BUILDING ENERGY BENCHMARKING**

February 27th, 2026



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## EXECUTIVE SUMMARY

Building energy benchmarking is like giving a building an energy score. Using a consistent metric across buildings of different sizes and uses allows owners to easily see which buildings are performing well and which are not. This clarity helps identify waste, target low-cost improvement opportunities, and ultimately reduce utility bills and emissions. The benchmarking process also requires analyzing and integrating two large datasets: building ownership and characteristics data from municipalities, and energy data from the utility and vendors of delivered fuels. Annual benchmarking allows building owners to track changes in performance over time.

In preparing this report, the Office of Energy Resources (OER) facilitated discussions on benchmarking with municipalities, the Rhode Island League of Cities and Towns, chambers of commerce, building owners, Rhode Island Energy, and other stakeholders. OER also reviewed benchmarking programs in other states to understand best practices and common challenges. This outreach confirmed that benchmarking is a powerful standalone tool for uncovering energy-efficiency and emissions-reduction opportunities, but it is also a complex, multiyear process. Many building owners are unfamiliar with benchmarking requirements and would face a significant administrative burden in accessing utility data, setting up and maintaining accounts, complying with reporting obligations, and identifying feasible efficiency improvements without substantial technical assistance.

Benchmarking offers Rhode Island a tool for better understanding energy use in large buildings. OER is currently benchmarking 45 state buildings and plans to complete benchmarking for all 85 state-owned buildings over 25,000 square feet by the end of 2026. With current staffing, OER can expand to approximately 750 municipal and state buildings within three years, contingent on a foundational partnership with Rhode Island Energy. Benchmarking the estimated 4,000 large buildings (public and private) statewide would be a substantial administrative and programmatic undertaking that would require municipal cooperation, additional staffing and funding for OER, and new infrastructure to implement and oversee such a program effectively.

### Key Findings

- **Benchmarking may uncover cost-saving opportunities:** Accurately scoring building energy performance reveals hidden inefficiencies and enables efficiency-program administrators to strategically direct funding toward building owners most in need of cost relief, though cost-saving opportunities are highly dependent on the unique characteristics of individual buildings, ownership structures, financial constraints, and evolving energy market conditions.
- **Implementation is resource-intensive and takes time:** Implementing a comprehensive benchmarking program is a resource-intensive, multi-year undertaking. A three-to-five-year timeline is typically required before data becomes reliable and actionable, meaning any potential benefits would not be realized for several years. Most municipalities lack the staffing, technical expertise, and infrastructure to support this work without substantial new state investment.
- **Utility leadership is a necessary condition for success:** Rhode Island Energy must be fully integrated into the program by enabling initial outreach to owners, providing energy data through a streamlined process, and connecting owners directly with energy efficiency programs. Without strong utility engagement, the program's effectiveness would be limited.
- **Owner burden and resistance are likely:** Many building owners have limited experience with benchmarking, leading to uncertainty about its value and mechanics. Compliance would require meaningful time and administrative effort – and, in some cases, outside consultants – which is likely to generate resistance.
- **Benchmarking introduces administrative and compliance costs:** Benchmarking creates upfront costs for owners and regulators – including data gathering, software subscriptions, staff time, and consultant support.

**Recommendations**

- OER recommends that the State phase any potential energy benchmarking program deployment timeline by owner type, beginning with approximately 750 large State, municipal, and school facilities to allow for program refinement under a manageable scope.
- OER recommends that the State focus on enabling the foundational partnership between Rhode Island Energy and OER that is necessary for efficient and effective benchmarking by requiring the Utility to expand existing data-reporting infrastructure.

## PURPOSE

The purpose of this document is to provide the Rhode Island Senate with information and recommendations regarding benchmarking for large buildings over 25,000 square feet, as directed by resolution S 1161 passed during the 2025 legislative session. Specifically, the Senate instructed OER to “undertake a building benchmarking review and analysis on the following:

- Status on the implementation of current benchmarking efforts on state properties;
- Recommendations for proper implementation of a benchmarking program that expands current benchmarking to municipal and private buildings greater than 25,000 square feet. Recommendations shall include and not limited to timeline for implementation, staffing requirements, resources, and programmatic changes;
- Feedback from the League of Cities and Towns and Chambers of Commerce on benchmarking program implementation and data collection; and
- Coordinate with Rhode Island Energy on modeling data, implementation, and cost of a benchmarking program.”<sup>1</sup>

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<sup>1</sup> Senate Resolution 1161.

## **BACKGROUND**

Building energy benchmarking, hereafter referred to as “benchmarking,” is the process of tracking and comparing a building’s energy usage with typical values, to identify opportunities for energy-efficiency improvements. The goal of benchmarking is to answer a simple question: how efficiently is a building using energy? Because buildings consume energy in different forms (e.g., electricity, natural gas, heating oil, steam, propane, etc.) and have unique design, occupancy, operational, and structural characteristics, it can be difficult to precisely evaluate a building’s energy performance for a given year.

Benchmarking aims to address some of these challenges by computing a metric that can be likened to a body-mass index (BMI), but for buildings. Just as BMI divides a person’s weight by the square of their height (as an approximation for their surface area), benchmarking divides a building’s total energy consumption (converted to a single unit) by its floor area. Generating this index value, commonly expressed as thousands of British thermal units (kBtu) per square foot, per year (kBtu/SF/yr), allows a building owner to compare their energy performance to other buildings that are used similarly, even if their energy sources and/or size don’t match. However, these comparisons are inherently limited by differences in building age, construction, equipment, tenant use, operating hours, and other factors that basic benchmarking cannot fully capture.

### **Required Data**

Benchmarking involves the annual collection of the building’s energy usage data, calculation of their index score, and publication of its performance, following the initial identification of buildings covered by a program. OER expects that benchmarking most large buildings statewide will require four key data: building square footage, building usage type, monthly electricity consumption for the calendar year, and monthly natural gas consumption for the calendar year. Benchmarking the small fraction of buildings with less common energy sources (e.g., onsite or offsite renewables, steam, propane, and oil) and/or less advanced energy metering infrastructure (e.g., campuses without individual building metering), will require additional energy data.

### **Building Data**

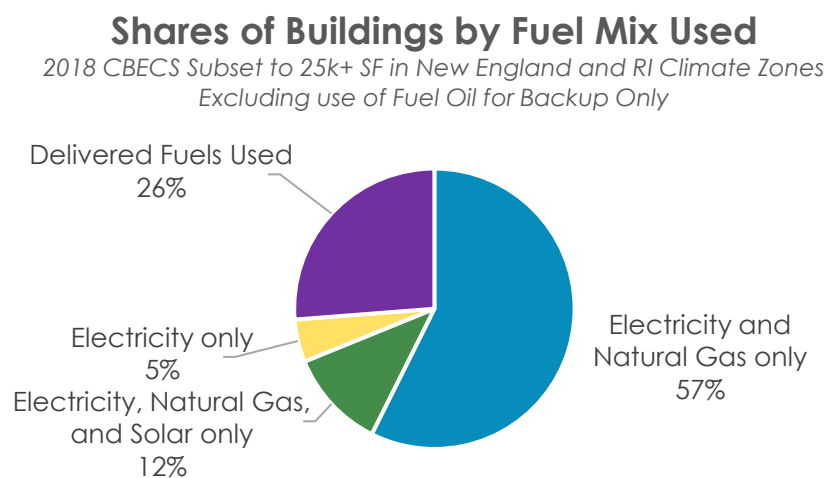
The required data on buildings themselves – square footage and building usage – are necessary for accurate comparison of energy efficiency between buildings of different types and usages. For instance, a large grocery store is expected to use more energy overall than a small convenience store, while both stores may use more energy than a medium-sized office that requires less energy for its operations. Campuses that lack submetering of fuels such as steam present distinct data challenges. In these cases, it is possible to use building square footages to compute a weighted-average reference “building” for comparison purposes.

### **Energy Data**

All energy sources used by a building must be included in the benchmarking calculation. Regardless of the energy source, monthly data (not annual totals) are necessary because they enable precise weather normalization of energy usage. This normalization removes the effects of seasonal weather extremes, allowing building owners to accurately measure the impact of efficiency improvements. For instance, if a building owner installs efficiency upgrades before a harsh winter, monthly data ensures the benchmarking system will reflect those improvements rather than showing increased energy use due to cold weather alone. For campuses that lack building-level submetering for steam and/or chilled or hot water, owners would report aggregate consumption across multiple buildings.

OER estimates that roughly a quarter of buildings over 25,000 square feet in Southern New England use at least one unmetered fuel such as steam, and thus would need to manually report at least some energy data to

the State for benchmarking, as shown in Figure 1 below.<sup>2</sup> Meanwhile, we estimate that a majority (74%) of buildings that would be subject to benchmarking rely exclusively on a combination of electricity, natural gas, and solar. Because the vast majority of such buildings, and nearly all large buildings statewide, are served by Rhode Island Energy, a partnership could allow for at least partial automation of benchmarking for many of these buildings.<sup>3</sup>



**Figure 1: Fuel Mixes of Large Buildings<sup>4</sup>**

### **Benchmarking of State Properties**

*Fulfilling Senate Resolution Request for: “Status on the implementation of current benchmarking efforts on state properties”*

State agencies are currently tasked with implementing Executive Order 23-06, which sets specific targets for reducing both emissions from onsite fossil fuel consumption and overall site energy use intensity in state properties:

- Reduce emissions from fossil fuels used onsite by buildings and vehicles from a 2014 baseline: 40% by 2030, 70% by 2040, and 95% by 2050.
- Reduce overall site energy use intensity (EUI), defined as weather-normalized Btu per square foot, from a 2014 baseline at state-owned buildings 20% by 2030, 30% by 2040, and 40% by 2050.<sup>5</sup>

As part of the reporting process under Executive Order 23-06, OER has been tracking building emissions and site EUI in-aggregate for the portfolio of State-owned buildings as well as building-level EUI for 16 properties since 2024. In collaboration with the Department of Administration (DOA) and other agencies, OER has identified a total of 85 state-owned and occupied buildings over 25,000 square feet that it intends to

<sup>2</sup> This estimate is based on 2018 Commercial Building Energy Consumption Survey (CBECS) data, filtered for New England buildings over 25,000 square feet within Rhode Island’s climate zones. The analysis excluded the minor use of fuel oil for onsite generation (only 1.4% of total usage across 35% of the sampled buildings). ANSI/ASHRAE, “U.S. Climate Zones for 2018 CBECS.”

<sup>3</sup> OER anticipates that Rhode Island Energy should be able to automatically provide monthly solar production data for most customers within roughly two years, once a firmware update has been applied to the new smart meters that are currently being installed.

<sup>4</sup> US Energy Information Administration, “Commercial Building Energy Consumption Survey Public Use Microdata.”

<sup>5</sup> McKee, “EO 23-06: State Agencies To Lead By Example And Act On Climate.”

benchmark over the next year. OER has set a goal to benchmark a total of 45 properties by the first quarter of 2026 and 85 by the end of 2026.

## FINDINGS

*Fulfilling Senate Resolution Request for: “Recommendations for proper implementation of a benchmarking program that expands current benchmarking to municipal and private buildings greater than 25,000 square feet. Recommendations shall include and not limited to timeline for implementation, staffing requirements, resources, and programmatic changes”*

### **Benchmarking is a Potential Tool to Both Building Owners and the State**

Accurate, year-over-year benchmarking data can serve as a tool for identifying buildings with the highest potential for energy-efficiency upgrades. By highlighting where inefficiencies may exist, benchmarking enables energy-efficiency program administrators to direct technical assistance and incentives toward owners who may benefit from further evaluation. This targeted approach helps inform deployment of upgrades that support the State’s broader emissions-reduction targets under the Act on Climate. Thus, the act of benchmarking provides informational benefits to both building owners and the State.

### **Accurate and Complete Benchmarking Takes at Least 3-5 Years**

*Fulfilling Senate Resolution Request for: information on “... timeline for implementation ...”*

Establishing accurate, complete benchmarking datasets for large building portfolios is a multi-year process. As of October 2025, eight states and 49 local governments have adopted benchmarking programs, most within the past ten years.<sup>6</sup> Four of these states and of these cities have since adopted building performance standards.<sup>7</sup> Based on conversations with regional organizations and peer jurisdictions, it typically takes at least three to five years after policy adoption before reliable data becomes available. Providence's Building Energy Reporting Ordinance (BERO) and Massachusetts' Large Building Energy Reporting (LBER) programs exemplify the challenge of even the simplest task: contacting owners.

Providence received zero responses to a physical mailing sent to owners in late 2024, while Massachusetts had to outsource processing of returned mail due to the volume of bounces received. Despite these difficulties, both Providence and Massachusetts yielded first-year compliance rates of approximately 40% in 2025 (roughly double the national average).<sup>8</sup> However, Providence staff indicated that nearly all compliant owners were already benchmarking for other reasons and thus expects that sourcing data from even the next 10% of buildings will be extremely challenging. Based on the city's experience and data from peer jurisdictions, Providence is unlikely to achieve full compliance and accurate year-over-year datasets until at least 2028, five years after enactment in 2023.<sup>9</sup> While Massachusetts is hopeful that its utility-centered approach may accelerate compliance rates once systems are established, the novelty of this process will likely cause delays of its own. Additionally, results from the first compliance year are plagued by numerous data-quality issues. Complete and accurate data are therefore unlikely before 2028, consistent with the typical three-to-five-year timeline.

Attempting to rush a benchmarking deployment not only results in poor data quality data but also diminishes regulator credibility. For instance, Providence’s extension of compliance deadlines and waiver of noncompliance penalties during the first reporting year make it more difficult for the City to enforce future

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<sup>6</sup> Institute for Market Transformation, “Comparison of U.S. Commercial Building Energy Benchmarking and Transparency Policies.”

<sup>7</sup> Institute for Market Transformation, *U.S. City and State Policies for Existing Buildings: Building Performance Standards*.

<sup>8</sup> Massachusetts Department of Energy Resources, “Large Building Energy Reporting Results.”

<sup>9</sup> City of Providence, Building Energy Reporting Program.

program requirements. Allowing sufficient time for complete program development prior to initial rollout with the first building owners ensures that data are meaningful and owners trust regulators from the start.

### **Many Building Owners Concerned about Burden of Implementation; Resistance is Likely**

*Fulfilling Senate Resolution Request for: “Feedback from the League of Cities and Towns and Chambers of Commerce on benchmarking program implementation and data collection”*

Last fall, OER met in-person with the League and two chambers of commerce, virtually with another two chambers, and distributed a survey to the membership of two more chambers (but did not receive any responses). Additionally, OER utilized Providence's BERO program to distribute a survey to building owners who submitted their first reports in 2025. Through this engagement with over 47 stakeholders several themes emerged:

1. **Low familiarity with benchmarking:** Stakeholders had generally heard of benchmarking but had limited hands-on experience. Owners often found the process confusing, especially when multiple websites were required, or when utility data were difficult to access.
2. **Openness tied to financial support:** Owners indicated they would be more receptive to benchmarking if it were accompanied by meaningful state subsidies for technology, administrative support, and energy upgrades. Cost was a primary concern for many owners, who were focused on the potential scale of funding and rebates available through the State or Rhode Island Energy to support benchmarking and energy upgrades.
3. **Concerns about unfunded mandates and data use:** Several owners feared that benchmarking data could later be used to justify mandatory performance standards, which they strongly oppose and view as potentially cost prohibitive. In addition, manufacturing-sector representatives raised concerns about the disclosure of proprietary or trade-sensitive information. A voluntary participation framework was consistently preferred.
4. **Early compliance data shows process friction:** All seven Providence BERO respondents indicated challenges in understanding requirements, managing multiple platforms, and obtaining utility data. This friction is especially concerning given Providence staff's indication that these owners were likely already benchmarking for other purposes and have had an easier time than other building owners. Among these seven owners, five completed compliance within weeks, one required several months, and one hired a consultant to navigate the process.

Taken together, this feedback highlights a clear message: stakeholders are concerned about complexity, administrative burden, cost, and potential downstream mandates, and would be more receptive if the process were simpler and structured in a voluntary and transparent manner.

### **Foundational Partnership With Rhode Island Energy Required for Effective Benchmarking**

*Fulfilling Senate Resolution Request for: “Coordinate with Rhode Island Energy on modeling data, implementation, and cost of a benchmarking program”*

The goal of benchmarking is to enable owners to better understand building energy usage and identify opportunities for efficiencies. To achieve this goal, benchmarking must provide readily available and accurate data for all large buildings to enable efficiency upgrades. However, a review of existing programs did not identify any that fully satisfied all four criteria. Existing programs tend to break down because they rely heavily on owner-led data collection, are plagued by inaccurate or incomplete meter information, have limited connections to efficiency programs, and suffer from low compliance rates. Automating data processes, streamlining initial meter mapping, and routing communications through existing channels could help reduce owner effort and improve data quality.

Taken together, the causes of benchmarking failure – owner burden, data inaccuracy, limited follow-through on efficiency upgrades, and low participation – are precisely the areas in which utilities are uniquely positioned to provide solutions. Because utilities already possess most required energy data, maintain established communication channels with nearly all large-building owners, and administer the State’s ratepayer-funded efficiency programs, utility partnership in benchmarking is the most promising path to a successful program that truly provides value to both owners and the State.

### Readily Available and Accurate Data

As indicated in Figure 1, nearly three-quarters of the buildings that would be subject to statewide benchmarking use energy that is either provided or metered exclusively by Rhode Island Energy, while almost all remaining large buildings rely on the Company for at least electricity service. This positions Rhode Island Energy to play a central role in automating key elements of a statewide benchmarking program, including aggregating meter-level data to the building level and automatically transferring monthly energy data to compliance software. Building owners must be able to aggregate the appropriate meters for each building while excluding others (such as separately metered EV chargers or parking garages) and update these meter assignments over time. Regulatory verification of the meter-to-building mapping – through itemized summaries of included and excluded meters – remains essential to ensure complete and accurate reporting. As part of its ongoing Advanced Metering Functionality (AMF) deployment, Rhode Island Energy is collecting information on existing electric meters such as location and load served that could significantly streamline this mapping process for electricity usage. However, requiring buildings that have not yet received AMF meters to benchmark would increase complexity, as doing so would necessitate reconciling both legacy and AMF meters across separate software systems for the same reporting year. As of November 2025, Rhode Island Energy does not offer a platform that supports fully dynamic and transparent meter-to-building mapping. The Company does, however, provide a Building Data Portal administered by Calico Energy which, after manual meter-to-building setup, allows owners to export whole-building usage or automatically push data to ENERGY STAR Portfolio Manager. With further development, this portal could potentially be expanded to enable direct data transfer to the State, significantly reducing owner burden and improving overall compliance rates.

The first and only large-scale example of a utility-centered benchmarking model currently in operation is the Massachusetts Department of Energy Resources’ (DOER) Large Building Energy Reporting (LBER) program. This program substantially reduces compliance burdens by requiring utilities to report energy data on behalf of building owners rather than relying on owners to manage data collection themselves. Early anecdotal evidence from the program’s initial year indicates strong owner preference for this utility-led approach compared to traditional owner-driven reporting models used by local jurisdictions.

### For All Large Buildings

Achieving comprehensive building benchmarking requires a data-collection framework that reaches all owners efficiently while minimizing administrative burden. Rhode Island Energy is uniquely positioned to facilitate this process thanks to their existing customer relationships with nearly every large building statewide. A streamlined deployment could leverage existing utility infrastructure to achieve high participation rates in ways that regulator-led outreach cannot replicate. By embedding benchmarking requirements within established customer portals, benchmarking could be made a routine component of account management.

### Enables Efficiency Upgrades

Benchmarking is most effective when it not only identifies inefficient buildings but also directly connects owners with options for implementing energy-saving improvements. Because Rhode Island Energy administers the State’s ratepayer-funded energy efficiency program, the utility is optimally positioned to translate benchmarking insights into targeted energy upgrades. The real value emerges when the utility can leverage benchmarking data – potentially at a more granular level than state reporting would require, such as separate

gas and electric consumption – to prescreen buildings for specific upgrade opportunities. This direct linkage ensures that benchmarking functions not merely as a reporting obligation but as an intelligence system that drives meaningful reductions in emissions.

### **Program Cost for Statewide Benchmarking**

*Fulfilling Senate Resolution Request for “Coordinate with Rhode Island Energy on modeling data, implementation, and cost of a benchmarking program”*

To assess the total costs of benchmarking, OER evaluated two possible program models: (1) a public-sector-only benchmarking program, which would require benchmarking approximately 750 municipal and state buildings, and (2) a statewide benchmarking program that would include an estimated 3,974 public and private large buildings statewide. Cost modeling indicates that a public-sector-only program would cost at least \$480,000 annually, and a full statewide program including for large private buildings at least \$1.4 million annually. For both program models, we assume that the State benchmarks buildings over 25,000 square feet in Providence that are already subject to the local BERO program.

OER also worked with Providence and Rhode Island Energy to incorporate estimates of owner and utility costs. Survey results from Providence’s initial benchmarking year show that owner compliance costs remain low, with a median cost of \$100 per building or \$500 per owner, and only one respondent reporting the need for consultant support. While Providence indicated that many owners who complied in the first year were already benchmarking for other purposes and thus may have had an easier time than an owner with no experience, we nonetheless use the median \$100/building value to account for the anticipated process improvements achieved through a utility-centered approach. To model costs that may be incurred by Rhode Island Energy in support of benchmarking, OER scaled figures provided by the Company based on the estimate building count for the applicable benchmarking program. For reference, the Company estimated in late November 2025 that its efficiency-program spending on benchmarking support for Providence’s BERO program would total \$131,000 for the calendar year.

While we model annual expenses for full program deployment, ongoing costs may decline after initial rollout as data collection processes become routine and meter-mapping is completed.

### **Costs of Benchmarking Large State and Municipal Buildings**

The State is already benchmarking roughly 45 large State facilities and is set to complete benchmarking for 85 by the end of 2026. Including these State facilities, OER estimates that approximately 750 large public buildings exist statewide among municipalities and school districts. While municipalities are better positioned to manage their own buildings, State provision of benchmarking as an optional service to municipalities that don’t have the capacity or interest in creating a benchmarking program of their own may result in greater energy and emissions reductions. Based on outreach to all 39 municipalities, only Providence and Newport have dedicated full-time staff focused on energy or sustainability issues, reflecting the reality that most municipalities prioritize limited resources toward core services. This resource challenge mirrors the Lead By Example team's experience delivering turnkey energy upgrades to public-sector buildings statewide, which has revealed energy-efficiency opportunities where energy management has not been a primary focus. Contingent on a streamlined methodology enabled by a foundational partnership with Rhode Island Energy, State-led voluntary benchmarking of municipal and school buildings could efficiently deliver this service to all interested municipalities without requiring significant municipal staff time or additional local resources.

While OER has the staff capacity to benchmark approximately 750 large public buildings over the next three years under a streamlined methodology in partnership with Rhode Island Energy, additional funding for associated vendor and consultant costs is required. Implementing this public-sector-only model would require

one existing OER full-time employee plus an additional allocation of \$57,000 for vendor software and support, as detailed below in Table 1. Rhode Island Energy would be expected to incur \$313,000 annually for administration, software licensing, and customer support. Altogether, the estimated annual cost of a statewide public-sector benchmarking program is \$480,000, which equates to approximately \$640 per building. These costs are exclusive of the existing costs incurred by the Company associated with Providence’s BERO program.

**Table 1: Estimated Annual Costs of Benchmarking ≈ 750 State and Municipal Buildings >25,000 SF**

Entity	Program Need	Expense
<b>State of RI</b>		
<b>Office of Energy Resources</b>	<i>1 Full-Time Employee: Salary and Fringe (Existing)</i>	\$ 110,000
	Vendor Costs (Software, Consultant Support)	\$ 57,000
	<b>OER Subtotal</b>	<b>\$ 167,000</b>
<b>Other</b>		
<b>Rhode Island Energy</b>	Administration, Exclusive of Marketing	\$ 70,000
	Vendor Costs (Software, Customer Support)	\$ 243,000
	<b>RIE Subtotal</b>	<b>\$ 313,000</b>
<b>GRAND TOTAL</b>		<b>\$ 480,000</b>
<b>Per Building</b>		<b>\$ 640</b>

### Costs of Benchmarking All Large Buildings Statewide

While municipalities are more aware of local building stocks and closely tied to private-building owners than the State, State-led benchmarking of private buildings may drive higher compliance rates due to the limited municipal capacities for such programs. Towards estimating the costs of benchmarking large buildings statewide, OER has initiated the process of collecting building square footage, usage type, and owner information necessary for program administration from municipalities’ assessor databases. With the assistance of assessors in Smithfield and Barrington, OER has compiled building data from 16 Rhode Island municipalities as of January 2026 and expects to receive data from all remaining municipalities in the coming months following rollout of software updates to assessor database software. We provide a summary of this dataset in Table 4 within the appendix below. Given that data from all municipalities are not yet available, we provide estimates of the total number of large buildings (over 25,000 square feet) statewide in Table 2 below based on the data from the 16 municipalities and population-based estimates for the remaining 24 cities and towns.<sup>10</sup> This analysis suggests that Rhode Island has approximately 3,974 large buildings statewide, a figure roughly 70% higher than the initial estimate of 2,320 large buildings used in last year’s JR 6717A EC4 report on building energy benchmarking and performance standards. The EC4 estimate relied on anonymized commercial real estate data provided by a U.S. DOE national laboratory, whereas the current estimate is based on full building records from municipal tax assessor databases and is therefore expected to feature a smaller margin of error. While this database, once complete, will cover all municipalities, evidence from Providence and Massachusetts’ demonstrates that the information, especially square footage and owner address, may not be accurate.

<sup>10</sup> We used 2024 population estimates from the US Census\* to construct a simple linear regression between population and the number of buildings over 25,000 square feet. The regression showed a strong fit ( $R^2 = 0.9268$ ), enabling us to estimate building counts for the 23 municipalities without building data based solely on population. We then combined the reported and estimated values to produce a complete statewide total. \*US Census Bureau, “Incorporated Places and Minor Civil Divisions Datasets: Subcounty Resident Population Estimates: April 1, 2020 to July 1, 2024 (SUB-EST2024).”

Verification of these data would likely require Geographic Information System (GIS) assessments and outreach through the utility, respectively.

**Table 2: Estimated RI Buildings > 25,000 Square Feet by County**

County	Est. Buildings > 25k SF
Bristol	168
Kent	626
Newport	269
Providence	2,487
Washington	424
<b>TOTAL</b>	<b>3,974</b>

Benchmarking this full statewide portfolio of 3,974 buildings would require substantial additional resources. As summarized in Table 3 below, a statewide benchmarking program would require an annual State expenditure of \$382,000, consisting of \$110,000 for an existing full-time employee, \$110,000 for a new full-time employee, and \$162,000 in vendor software and support. Rhode Island Energy would incur an estimated additional \$611,000 annually for administration, software licensing, and customer support, while private building owners would collectively face approximately \$397,000 in compliance costs. Altogether, the estimated annual cost of implementing benchmarking for all large buildings statewide is \$1.39 million, or approximately \$350 per building. The larger private program realizes a lower marginal cost per building as fixed administrative expenses are spread over more buildings.

**Table 3: Estimated Annual Costs of Benchmarking All  $\approx$  3,974 Buildings >25,000 SF**

Entity	Program Need	Expense
<b>State of RI</b>		
<b>Office of Energy Resources</b>	<i>1 Full-Time Employee: Salary and Fringe (Existing)</i>	\$ 110,000
	1 Full-Time Employee: Salary and Fringe (New)	\$ 110,000
	Vendor Costs (Software, Consultant Support)	\$ 162,000
	<b>OER Subtotal</b>	<b>\$ 382,000</b>
<b>Other</b>		
<b>Rhode Island Energy</b>	Administration, Exclusive of Marketing	\$ 160,000
	Vendor Costs (Software, Customer Support)	\$ 451,000
	<b>RIE Subtotal</b>	<b>\$ 611,000</b>
<b>Private Owners</b>	Compliance	\$ 397,000
	<b>Owners Subtotal</b>	<b>\$ 397,000</b>
	<b>GRAND TOTAL</b>	<b>\$ 1,390,000</b>
	<b>Per Building</b>	<b>\$ 350</b>

## RECOMMENDATIONS

### Prioritize Benchmarking of Large Public Buildings

OER views benchmarking data as a critical asset for identifying energy-efficiency opportunities in buildings. However, the deployment of a successful benchmarking program that readily delivers accurate data and efficiency-program leads for all large buildings with minimal owner intervention will take at least three-to-five years to properly develop, launch, and refine. **Given the challenges of delivering such a program, OER recommends that any future benchmarking program features a phased timeline that prioritizes the public sector before expanding to private buildings.** Benchmarking public buildings first would enable the State to more quickly identify and take action to reduce energy waste that costs taxpayers money, while providing a critical period for the State to develop the necessary infrastructure and expertise to deliver any future private-building implementation. Towards realizing this phased approach, OER intends to lead a benchmarking program for large public buildings over 25,000 square feet statewide. Beginning with up to 750 large public buildings on a voluntary basis will allow OER to refine data-collection processes, test software platforms, and resolve meter-mapping challenges using existing staff capacity with modest annual funding for vendor support.

### Codify Utility Partnership to Enable Efficient Benchmarking

Lessons learned from peer jurisdictions and from the Lead By Example team's experience with state properties demonstrate that benchmarking even the estimated 750 large State, municipal, and school buildings – let alone all large private buildings statewide – cannot be done accurately, efficiently, or at scale without a foundational partnership with Rhode Island Energy. The utility already holds the majority of required energy data, maintains communication channels with nearly all covered buildings, and administers the statewide efficiency program. As such, a utility-centered approach would reduce administrative burden and provide the most reliable pathway to accurate datasets. While this method would result in higher costs incurred by Rhode Island Energy and thus ratepayers, the alternative of limited utility involvement would be unlikely to result in successful benchmarking at-scale across the state. **Therefore, OER recommends an explicit requirement that Rhode Island Energy provide OER necessary data infrastructure, communication channels, and connections to existing efficiency programs to properly implement energy benchmarking.**

## APPENDIX

Table 4: Count of Large Buildings >25,000 SF by Municipality, 16 Municipalities<sup>11</sup>

<b>Municipality</b>	<b>Building Count</b>
Central Falls	53
Charlestown	4
Cranston	279
Cumberland	93
Exeter	9
Hopkinton	19
Johnston	102
Lincoln	111
Little Compton	1
North Kingstown	170
Pawtucket	296
Portsmouth	52
Richmond	16
Smithfield	118
Warwick	345
Westerly	68
<b>TOTAL</b>	<b>1,736</b>

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<sup>11</sup> OER had obtained data from 16 municipalities as of early January 2026. OER used population data to estimate the number of large buildings within the remaining 24 municipalities and reports these estimated totals by county in Table 2.

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