



STATE OF RHODE ISLAND

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December 10, 2025

Terrence Gray, Director & Council Chair
Department of Environmental Management
Executive Climate Change Coordinating Council
235 Promenade Street, Suite 230, 2nd floor
Providence, Rhode Island 02908

RE: The Executive Climate Change Coordinating Council's Executive Summary to the Rhode Island 2025 Climate Action Strategy

Dear Director Gray,

Attorney General Peter F. Neronha offers the following comments in response to the Draft Executive Summary for the Executive Climate Change Coordinating Council's ("EC4") Rhode Island 2025 Climate Action Strategy ("2025 Summary") which was released for public comment on November 25, 2025.¹ These comments aim to aid in preparation of the final 2025 Climate Action Strategy ("2025 Strategy") set for publication by the end of this year, as well as the State's necessary responsive action going forward. In addition to the 2025 Summary and accompanying materials posted as of December 4, 2025, the Attorney General's Office has reviewed available supporting documentation, including the "Evaluation of Transportation Carbon Reduction Strategies for Rhode Island" Report ("Transportation Report")² and presentation slides used to facilitate public meetings held by the EC4 Advisory Board while developing the 2025 Strategy.³ The EC4 Advisory Board's

¹ "Public Comment", Draft Climate Action Strategy Executive Summary (last accessed on December 9, 2025), available at: <https://climatechange.ri.gov/act-climate/public-comment>.

² Evaluation of Transportation Carbon Reduction Strategies for Rhode Island, CAMBRIDGE SYSTEMATICS, INC. (Nov. 2025), available at <https://climatechange.ri.gov/act-climate/2025-climate-update>.

³ It should be noted that the formulation of the 2025 Strategy often included discussion of a Comprehensive Climate Action Plan (CCAP). Rhode Island's CCAP is similar to its 2025 Climate Strategy in that it models greenhouse gas (GHG) reduction measures for specific sectors based on robust stakeholder engagement and analysis of policy, technology, cost, macroeconomic conditions, workforce conditions, climate resilience, and expected benefits. *See e.g.* RI 2025 Climate Action Strategy and CCAP: Kickoff Meeting, BW RESEARCH PARTNERSHIP, LIGHTHOUSE CONSULTING GROUP, INC. & ENERGY + ENVIRONMENTAL ECONOMICS 14 (Mar. 27, 2025). EC4 worked on

comprehensive efforts to gather and incorporate public input throughout the development of the 2025 Strategy have been commendable, and the Attorney General appreciates this opportunity to provide comments.

I. INTRODUCTION

Climate change is drastically impacting Rhode Island, with rising average temperatures, sea levels, precipitation rates, and frequency of coastal flooding events. In Rhode Island, temperatures have risen by 4 degrees Fahrenheit over the past century.⁴ The State has also experienced a below-average number of very cold nights since the 1980s.⁵ The State's predisposition to flooding also means that it is disproportionately impacted by rising sea levels. In fact, the average sea level in Newport has risen by about 0.12 inches (2.97 mm) each year since 1930 — nearly an increase of one foot in a century.⁶ These sea level changes are expected to bring about both large increases in tidal flood events and smaller local flooding events.⁷ These impacts are increasingly felt by the State's population, significantly harming our coastal resources, natural ecosystems, and economy.

To avoid the worst of these impacts, the Rhode Island legislature passed the 2021 Act on Climate, committing the State to reduce greenhouse gas emissions to 45% below 1990 levels by 2030, 80% below 1990 levels by 2040, and achieve net zero by 2050. *See* R.I. Gen. Laws § 42-6.2-9. Moreover, it is within the powers, duties, and obligations of *all* state departments and agencies to consider the Act on Climate and its greenhouse gas emission-reduction mandates in their decision-making processes. *See* R.I. Gen. Laws § 42-6.2-8. At this critical and unprecedented juncture, Rhode Island is called upon to continue its commitment to aggressive and innovative action to protect the public health and safety and preserve our natural resources for all Rhode Islanders.

The 2025 Strategy is an important tool in this effort, empowering the State and Rhode Islanders with essential information and guidance on reducing Rhode Island's economy-wide emissions to ensure compliance with the Act on Climate and address the urgent threat of climate change. By statute, this important planning document must “include[e] strategies, programs, and actions to meet economy-wide enforceable targets for greenhouse gas emissions reductions” in accordance with the Act on Climate. R.I. Gen. Laws § 42-6.2-2(a)(2). EC4 is not only charged with developing the 2025 Strategy, but has also been directed by the legislature to “[a]ssess, integrate, and coordinate climate change efforts throughout state agencies to reduce emissions, strengthen the

completing its CCAP alongside its 2025 Climate Strategy using a federal EPA Climate Pollution Reduction Grant awarded to the State to complete its CCAP. *See* 2025 Summary at 1.

⁴ Jennifer Runkle & Kenneth E. Kunkel, *National Centers for Environmental Information State Climate Summaries 2022: Rhode Island*, <https://statesummaries.ncics.org/downloads/RhodeIsland-StateClimateSummary2022.pdf>

⁵ *Id.*

⁶ National Oceanic and Atmospheric Administration, *Relative Sea Level Trend 8452660 Newport, Rhode Island*, Tides & Currents (2024), https://tidesandcurrents.noaa.gov/sltrends/sltrends_station.shtml?id=8452660#tabmeantrend.

⁷ Jennifer Runkle & Kenneth E. Kunkel, *supra* n. 4.

resilience of communities and infrastructure, and prepare for the effects on climate change.” R.I. Gen. Laws § 42-6.2-2(a)(1). This is no small task given the strong commitment made by Rhode Island to remain a leader in the national and global efforts to combat the effects of climate change. Moreover, while this 2025 Strategy is an important milestone, efforts by EC4 and the entire State will be required as we continue working towards net zero emissions.

II. WHILE PROGRESS HAS BEEN MADE, ADDITIONAL EFFORTS STATEWIDE WILL BE NEEDED

At the outset, the 2025 Strategy process and product demonstrate a serious evolution from the Rhode Island 2022 Climate Update (the “2022 Update”). In the 2022 Update, EC4 identified that Rhode Island was, at that time, projected to fall short of the level of greenhouse gas emission reductions necessary to meet the 2030 mandate. But the 2022 Update left an approximately six-percent gap unaddressed. *Attorney General’s Comments on Draft 2022 Update* (“2022 Comment”), State of Rhode Island Office of the Attorney General 4 (Dec. 9, 2022). It also included policy measures that were not entirely within State control, with no meaningful explanation of how the State could achieve those goals. *Id.* Perhaps most noticeably, even when a policy could be quantified (i.e. the number of new or replacement vehicles that would need to be electric vehicles) the 2022 Update failed to project or describe those numbers and goals in any meaningful way. *Id.* at 5, 6.

By contrast, the Attorney General notes that the modeling that was done in preparation for the 2025 Climate Strategy was markedly improved. It is very much appreciated that the 2025 Summary, while noting that current policies will achieve the 2030 mandate, features discussions of the *immediate* policies and goals that must be implemented to keep on track with the modeling. That is, while noting that existing regulatory policies are projected to achieve a 45% reduction under 1990 emission levels, as is needed by 2030, the 2025 Climate Strategy also outlines the steep rates of adoption Rhode Island must achieve for both electric vehicles and heat pumps to achieve Act on Climate compliance. These numbers are stark, and they are exactly what the public, agencies, and other policy makers need to know—EV sales must essentially triple in the next year and continue to climb, and heat pump adoption must nearly double, and double again, by 2028. 2025 Summary at Figure 5, Figure 6.

It appears from the 2025 Summary that EC4 will adopt specific short-term recommendations from those outlined in Tables 1, 2, and 3. The Attorney General supports a recommendation of implementation steps, and believes that the priorities that emerge from the 2025 Summary and prior presentations point to specific implementation steps that should be the focus of government attention in order to set the best foundation possible. Two are immediately clear: 1) maintain and adjust state-level EV incentives; and 2) increase weatherization and home heating electrification incentives. The New England Heat Pump Accelerator is another worthy short-term implementation, and it appears that RI OER is already pursuing the pilot program contemplated under this program to continue supporting adoption of efficient heat pump technologies.⁸ In the

⁸ See New England Heat Pump Accelerator, Rhode Island Office of Energy Resources,

transportation sector, additional policies that should be adopted immediately include public fleet electrification, since this is solely in state control and therefore achievable, and mode shift and transit policies. In buildings, focus should remain on electrification and on developing the legislative and regulatory framework for clean heat standard and building performance standards. It is also essential to success in 2030 that Rhode Island maintains or exceeds its commitment to achieve 100% renewable electricity by 2033 as required under the State's Renewable Energy Standard.

None of the above will be easy, and none of these initiatives are sufficient to meet net zero by 2050 without further action in the future. However, focused attention can keep these goals within reach. The 2025 Summary rightly discusses costs and benefits, including direct consumer costs. To be sure, up-front expenses must necessarily be incurred to ensure long-term benefits and avoid an unplanned future where all these expenses are realized at once. Rhode Island should concentrate efforts on the "Investigation into the Future of the Regulated Gas Distribution Business in Rhode Island in Light of the Act on Climate Docket, Docket No. 22-01-NG (the "Future of Gas Docket") currently before the Public Utilities Commission, and other utility proceedings to ensure incentives and utility investment align to encourage and support electrification in the most efficient and equitable manner. In addition, Rhode Island's track record of efficiently and quickly disseminating rebates should be capitalized on and expanded. While certain federal programs may be delayed, Rhode Island should seek to backfill and enhance lapsed incentives.

These are difficult times for States such as Rhode Island that are committed to combatting climate change. At the same time, this is no excuse to weaken our convictions. The loss of robust federal support means that Rhode Island's government must find other ways to achieve the Act on Climate's mandates. The Attorney General's Office has done its part, filing suit to combat the current Administration's efforts to stymie offshore wind development, defund important programs like the National Electric Vehicle Infrastructure Formula Program and the Solar for All Program, and roll back vehicle emission and fuel economy standards, and we will continue to do so. Now, agencies must do all they can in budget proposals and daily operations to support these policies and keep Rhode Island on track. To facilitate this, the State may need to look at an increase or re-purposing of progressive broad-based revenue mechanisms like income taxes, to fund the near-term investments necessary for a cleaner and stronger economic future. In many cases these alternatives to increased utility rates are more equitable. To meet the Act on Climate, revenue and spending must align—that means expedient revenue mechanisms, like the recently enacted enhanced registration fees for electric and hybrid vehicles, which do not align with Act on Climate goals, should be rolled back and replaced with other revenue mechanisms that do.

III. BOTH SHORT- AND LONG-TERM ACTION MUST BE PURSUED

The 2025 Summary provides a useful springboard for gauging the State's projected emissions and relevant strategies in the near- and long-term. The 2025 Summary essentially presents

<https://energy.ri.gov/heating-cooling/new-england-heat-pump-accelerator> (last visited December 9, 2025).

two scenarios: a “Current Policy Scenario” and an “Act on Climate Scenario.” 2025 Summary at 7, 9. The Current Policy scenario assumes full compliance with existing state laws and programs including the Renewable Energy Standard, existing state energy-efficiency programs, implementation of heat-pump and electric-vehicle incentives, and vehicle emission laws. 2025 Summary at 8; *see* R.I. GEN. LAWS § 39-26-4 (Renewable Energy Standard); 250-120-05 R.I. CODE R. pt. 37 (Advanced Clean Cars II and Advanced Clean Trucks). The 2025 Summary’s Act on Climate Scenario outlines a path to compliance with the Act on Climate through 2050. *Id.* at 9-10. This “scenario does not model the impact of individual policies, but rather back-casts the necessary ambition needed to reach climate goals.” *Id.* at 9, n.6. This is done with the aim of “examin[ing] the level of transformation needed across all sectors of the economy in order to achieve Rhode Island’s 2030, 2040, and 2050 GHG reduction targets.”⁹

Under the Current Policy Scenario, Rhode Island “is on track to meet its [emissions reduction] target for 2030” but in subsequent years is only projected to reach emissions reductions of “62% below 1990 levels by 2040 and 70% below 1990 levels by 2050.” 2025 Summary at 6. This should ring the alarm for State agencies and policymakers. While current efforts have clearly made substantial progress, we are expected to fall far short of the State’s long-term emission reduction mandates. Now is not the time to sit back and commend the State for potentially setting itself up to comply with 2030 emission requirements, but to instead bolster current efforts to not only avoid backsliding but to make progress towards our more difficult future targets.

IV. EFFORTS MUST BE MADE ACROSS ALL SECTORS

The 2025 Summary and accompanying materials identify specific sectors of the Rhode Island economy, and other substantive areas such as land use, which are critical to coordinating efforts to reduce statewide emissions in accordance with the Act on Climate. The Attorney General emphasizes the need to consider action in every one of these sectors in both the short- and long-term to ensure compliance with the Act on Climate in 2030 and beyond.

A. Transportation Sector

As indicated in the 2025 Summary, swift and comprehensive action to reduce emissions in the transportation sector is critical to Rhode Island’s achievement of the emissions reductions mandates set forth in the Act on Climate. “Transportation is currently Rhode Island’s highest emitting sector, contributing ... around 35% of total gross GHG [greenhouse gas emissions]” for the State. 2025 Summary at 10. As articulated by this Office’s comments earlier this year on other state-wide plans, including the update to the State’s Long Range Transportation Plan (“LRTP”) and the State Transportation Improvement Program (“STIP”), concrete actions to strengthen the State’s public transportation are necessary to ensuring an equitable and meaningful reduction in transportation emissions in Rhode Island.

⁹ “R.I. Climate Action Strategy and Comprehensive Climate Action Plan,” Pathways to Decarbonization Public Webinar, *prepared by E3, Lighthouse Consulting*, at 11, (Oct. 31, 2025).

One of the components informing the 2025 Strategy, the Transportation Report, provides a useful scaffold for identifying actions necessary to improve and solidify Rhode Island's public transportation system. For example, the report delineates a category of strategies entitled "mode shift and [vehicle miles traveled] reduction" which includes "active transportation infrastructure", "micromobility programs, services, and incentives", "expanded public transit services", "travel demand management programs", "transportation-efficient land use patterns", and explains these strategies' and the related assumptions. Transportation Report at 8. Additionally, the inclusion of the "Expanded Public Transit Services" category described in the Transportation Report, which considers implementation of vital public transit projects such as the "Frequent Transit Network," "bus rapid transit/light rail improvements," and "MBTA commuter rail all day frequent service," among others, is commendable. Transportation Report at 24. These projects offer a critical path toward meaningfully reducing transportation-related emissions in the State and efforts to implement them should be made as soon as practicable.

As discussed above, nimble and flexible planning must be undertaken to account for various obstacles that are apparent in reality, apart from original modeled policy outcomes. To that end, Rhode Island must seek to implement improvements now, rather than simply rely on the projection that current conditions place the State on a path to 2030 Act on Climate compliance. In the 2025 Summary's Act on Climate Scenario, "it's assumed about 142,000 EVs would be on the road by 2030, necessitating the annual sale of 13,000 EVs sold in 2025 increasing to 36,000 EVs sold in 2030." 2025 Summary at 10. Given the historical rate of passenger zero emission vehicle registrations, this is a tall task. While continued growth of EV adoption is needed, real-world numbers appear to show that sales are stagnating. *See* 2025 Summary at 10, Figure 5 (showing potential decline in EV sales from 2024-2025). Furthermore, given "recent federal government action that repealed the EV tax credit several years earlier than expected" the State should be working to fill this gap and support low and zero emission travel. *Id.* at 10. The Transportation Report specifies that the clean vehicle incentives it contemplates, which would continue the federal incentives at the 2023 rate, will cost \$31.7 million from 2026-2030, or about \$6 million per year. *See* Transportation Report at 47. As the Transportation Report makes clear, this is a relatively low cost for the anticipated emissions reduction and is an achievable investment. *Id.* State policymakers should, at minimum, fund this level of incentive credit.

B. Electric and Building Sectors

The electric and building (including home heating) sectors are responsible for roughly half of the State's emissions and present unique and difficult challenges. *See* 2025 Summary at 5 (attributing 29% of emissions to the building sector, and 19% to power generation and imported grid electricity). To ensure compliance with the Act on Climate, focused and aggressive efforts must be made to address these important issues that impact all Rhode Islanders – particularly with respect to future use of our State's natural gas distribution system and traditionally unregulated fossil fuels.

It is imperative that the 2025 Climate Strategy align with the important efforts being made in the Public Utility Commission's Future of Gas Docket. Currently, that docket and other Public

Utility Commission proceedings are seeking answers to some of the most difficult questions facing Rhode Island, including identification of segments of the gas distribution system that could be abandoned and methods through which such abandonment could be pursued. To the greatest extent feasible, EC4 should support and collaborate with the Public Utility Commission and stakeholders in the Future of Gas Docket to coordinate a cost-effective and equitable reduction of the State's reliance on fossil fuels as we pursue net zero emissions.

Still, efforts cannot end there. The EC4 Advisory Board, in presentations to the public, has noted the need for increased green energy development, such as “[n]ew offshore wind starting in 2035 ... [that] grows rapidly to meet GHG reduction targets” and “Solar ... primarily added through the early 2030s.”¹⁰ This is particularly important given that electricity usage is projected to continue increasing in coming years. *See e.g.* 2025 Summary at 13, Figure 7. To the extent that projected emission reductions depend on regional or federal scale sources of energy, the EC4 should seek to identify methods for intra-state efforts to promote clean energy generation, and funding mechanisms that can aid in efforts to fill potential federal and regional gaps in the energy mix in the coming years.

The 2025 Summary also analyzes seven broad strategies to reduce GHG emissions from the building sector: all-electric new construction; maintaining and adjusting state energy-efficiency incentives, increased pre-weatherization and whole-home electrification incentives, government building decarbonization, the New England Heat Pump Accelerator program, a Building Performance Standard, and a Clean Heat Standard. 2025 Summary at 21. As EC4 notes, “[u]nder [the Act on Climate Scenario], 100% of buildings have a heat pump installed by 2050.” *Id.* at 11. To achieve that end goal, Rhode Island would need a total of 70,000 heat pumps by 2030, with the number of heat pumps sold annually increasing to 15,000 by that same year (versus 3,000 annually at present). *Id.* Heat pump adoption must be drastically increased and appropriately encouraged if Rhode Island is to meet its emission reduction mandates. Again, this is all the more important to address at the state level in the current federal climate. For instance, the highly successful Clean Heat RI Program, has now focused its efforts on incentives for low and moderate income households.¹¹ While income-based equitable efforts are important, additional funding could potentially help open incentive opportunities back up to all Rhode Islanders looking to switch away from fossil fuel heating and increase the overall rate of heat pump adoption.

EC4 should also expound on the potential for two standards explored in the modeling — the building-performance standard and the clean-heat standard. *See id.* at 21. EC4 should stress the need to identify resources to develop, implement, and ensure comprehensive enforcement and compliance with, these standards. As the Attorney General has previously noted in its comments on

¹⁰ “R.I. Climate Action Strategy and Comprehensive Climate Action Plan”, Pathways to Decarbonization Public Webinar, *prepared by E3, Lighthouse Consulting*, at 35 (Oct. 31, 2025), available at <https://climatechange.ri.gov/act-climate/2025-climate-update>.

¹¹ *See* Clean Heat RI, New Incentives for Low-to-Moderate Income Households, <https://cleanheatri.com/> (last visited December 9, 2025).

the draft of EC4's 2022 Update this presents certain challenges as, "building codes in Rhode Island are enforced primarily by local entities, with the State Building Commission only issuing permits for buildings on State land or [land] owned by the State." 2022 Comment at 4.

C. Jobs and Equity

In its quest to combat climate change, Rhode Island must also remain committed to equitable means of reducing emissions. The Act on Climate itself emphasizes the need for plans that fosters "an equitable transition to climate compliance for environmental justice populations, and [the] redress [of] past environmental and public health inequities." R.I. Gen. Laws § 42-6.2-2(a)(2)(v). To be sure, EC4 has noted the importance of "help[ing] the community to make a just transition to a new energy system by supporting workers to learn new trades, making streets safer for multiple forms of transportation, addressing needs around transit, food, and public green spaces, and supporting local climate resilience plans."¹² The 2025 Summary acknowledges this important consideration, and highlights the impacts of various climate strategies on equity by including an "equity focus" meter for each strategies EC4 has analyzed. *See e.g.* 2025 Summary at 21, Table 2 (considering equity focus of several building-focused near-term strategies). In furtherance of these goals, EC4 should, in the 2025 Strategy, clarify how it has considered equity and environmental justice in its decision-making wherever practicable. While these issues are inherently multilayered, multifaceted, and at times difficult to quantify, their proper consideration is essential to ensuring that all Rhode Islanders are considered as we comply with the Act on Climate.

D. Land Use

Land conservation is an important component of the preservation and expansion of emissions sinks in Rhode Island. Accompanying materials to the 2025 Strategy recognize "maintain[ing] [c]arbon [s]inks" as part of the Current Policy Scenario.¹³ Furthermore, public presentations facilitated by the EC4 Advisory Board acknowledge the importance of "[m]aintain[ance] [of] current levels of carbon storage and sequestration provided by natural & working lands and increase[s] [to] this capacity where possible."¹⁴ Currently, open space and land preservation programs in Rhode Island continue to lack a consistent funding in the state budget, and instead rely on green bonds. Thus, strategies regarding land use should be pursued with clear

¹² "2025 Climate Action Strategy", State of Rhode Island Climate Change (last accessed on December 4, 2025), <https://climatechange.ri.gov/act-climate/2025-climate-update>.

¹³ "R.I. Climate Action Strategy and Comprehensive Climate Action Plan", Pathways to Decarbonization Public Webinar, *prepared by E3, Lighthouse Consulting*, at 12 (Oct. 31, 2025), available at <https://climatechange.ri.gov/act-climate/2025-climate-update>; *see also* "R.I. Climate Action Strategy and CCAP", Potential Carbon Reduction Strategies, *prepared by E3, Lighthouse Consulting*, at 10, (Oct. 16, 2025), available at <https://climatechange.ri.gov/act-climate/2025-climate-update>.

¹⁴ *Id.*

funding mechanisms for specific state land conservation programs and grants to ensure preservation of lands that can offset greenhouse gas emissions and help the State reach net zero emissions.

V. INCREASED COMMITMENT FROM REGULATORS WILL BE REQUIRED

The 2025 Summary identifies several near-term strategies such as public-fleet electrification and mode shifting (for the transportation sector) and all-electric new construction and government-building decarbonization (for the buildings sector) to ensure the Act on Climate's 2030 emissions reduction target. *See* 2025 Summary at 19–22. As outlined, these actions are more readily pursued than others and could (and should) be acted upon in the next five years. *See id.* at 18-19.

It is also essential to simultaneously continue working on long-term planning. To ensure both the implementation of near-term policies and long-term planning, the Act on Climate empowers EC4 to direct agencies to take actions to implement the 2025 Strategy (and subsequent iterations of the plan). In particular, “[i]f a plan directs an agency to promulgate regulations, then the agency must do so [according to the prescribed procedures]” *Id.* § 42-6.2-2(1)(2)(iv). This authority presents a powerful tool for EC4 to fulfill its duty to “[a]ssess, integrate, and coordinate climate change efforts throughout state agencies.” *Id.* § 42-6.2-2(a)(1).

EC4 has already begun the work of identifying which agencies will need to coordinate to accomplish certain policy objectives,¹⁵ and EC4 should consider explicitly directing the relevant state agencies to promulgate regulations aimed at implementing Rhode Island's climate strategies. However, it should also be noted that EC4 directive is not the only way to initiate regulatory change in furtherance of our State's climate strategies and greenhouse reduction mandates. All agencies and regulatory bodies must actively review and consult the 2025 Strategy to independently consider how they may exercise their own authorities in furtherance of Act on Climate compliance.

VI. CONCLUSION

Ultimately, the 2025 Summary and the accompanying materials provided by the EC4 Advisory Board regarding the 2025 Strategy present a helpful starting point for guiding the State's efforts to achieve the Act on Climate's emission reductions mandates. That said, the publishing of this document should not be seen as a simple completion of a required task, but a meaningful call to action. It will be up to policymakers throughout the State and at every level of government to take these recommendations seriously and implement them. The Attorney General is ready to advance the State's climate goals and strategies through the continued efforts of this Office and looks forward to continued opportunities to do so.

¹⁵ For instance, the Transportation Report recognizes that although DOT is “taking the lead on modeling and evaluating the various transportation emission reduction strategies,” it is “not necessarily the lead agency to implement many of these strategies.” Evaluation of Transportation Carbon Reduction Strategies for Rhode Island, CAMBRIDGE SYSTEMATICS, INC. 6 (Nov. 2025). Rather, primary responsibility for implementation will rest with one or more of eight listed agencies. *Id.*

Sincerely,

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