

Investigation of Resource Adequacy Alternatives Docket No. EO20030203

On May 20, 2020, New Jersey Conservation Foundation (NJCF), the New Jersey League of Conservation Voters (NJLCV) and New Jersey Sustainable Business Council (NJSBC) submitted comments addressing a number of the central issues raised by BPU staff in its proceeding, Investigation of Resource Adequacy Alternatives.

In addition to these environmental and business organizations, the undersigned organizations also support these comments and want to emphasize several central points:

1. The MOPR rule “could impose significant costs on New Jersey as it pursues its goals and the state’s Global Warming Response Act’s requirements to deeply decarbonize its use of energy, including electricity generated regionally but consumed in New Jersey.”
2. Cost matters. “The FRR’s costs are unpredictable and could range from somewhat lower to much higher than those of the BRA/MOPR... The risk of high FRR prices is, in our view, the most substantial potential challenge to overcome before the state should elect the FRR alternative.”
3. The Board should explore, “a different potential approach to avoiding market power and ensuring fair and affordable FRR costs....An ex-ante RFP could discover mutually beneficial capacity prices, for both New Jersey and capacity sellers facing future BRA price risks... We recommend the BPU explore this two-sided safe harbor approach as a possible antecedent to making the actual decision of whether to commit to the FRR alternative.”

We appreciate the Board’s commitment to explore these issues and look forward to further opportunities to provide input on this important topic.

Environment New Jersey
The Watershed Institute
Pinelands Preservation Alliance
ReThink Energy NJ
New Jersey League of Conservation Voters
New Jersey Sustainable Business Council
New Jersey Conservation Foundation