

November 11, 2020

The Honorable Catherine McCabe
Commissioner
New Jersey Department of Environmental Protection
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401 East State Street
PO Box 402
Trenton, NJ 08625-0420

Commissioner McCabe:

On behalf Consumer Energy Alliance (CEA), a diverse group representing families, small businesses and men and women from various industries, including labor, manufacturing, small business and conservation, I write today to share our general comments on the Protecting Against Climate Threats (PACT) proposal issued by the New Jersey Department of Environmental Protection.

CEA supports actions that thoughtfully advance our nation and states towards a cleaner, more environmentally responsible energy future. We believe that responsible policies always consider the needs of consumers while leveraging and supporting the development of state-of-the-art technologies to improve our environmental stewardship, aiding in the continued decline of all emissions to improve air quality and the reduction of greenhouse gas emissions.

CEA has and will always support rigorous environmental protection standards and regulations that work for all Americans, especially the millions of unemployed and underemployed (including the over 11 percent of Jerseyans who are currently unemployed), as well as those who are on fixed incomes. Access to affordable energy and a cleaner environment should be paramount in our regulatory and political decision-making. CEA supports all efforts to keep energy and energy technology affordable and available to everyone, not just a few.

It is with that perspective that we provide our comments today. It is important to note that New Jersey already has one of the lowest amounts of greenhouse gas emissions per capita in the nation. The ambitious New Jersey PACT process was first started less than a year ago via an Executive Order from Governor Murphy that set out sweeping proposals in order to meet the state's aggressive goals of reducing greenhouse gas emissions to 80 percent below 2006 levels by 2050. Meeting these objectives will likely require the complete electrification of the transportation and building sectors with sources of that electricity necessarily coming from renewable energy – which will come at a considerable cost to consumers and industries.

In less than a year, the NJPACT process has covered:

- A new greenhouse gas emissions inventory program;
- Envisioned an entirely new set of land use regulations to mitigate climate change impacts with focuses on modeling and studies of anticipated sea-level rise, extreme weather events, and potential flooding;
- Reduction in emissions from stationary sources and transportation sources that included trucking sectors, ocean-going vessels, cargo handling, harbor craft, heavy duty trucks, drayage and more; and
- Emissions reductions from the utility sector and the advanced promotion of renewable energy as well as offshore wind.

Public participation for many of these extremely complex and dense topics were often held only a few days apart and comments were then due a week later – greatly impacting the public’s ability to garner a full understanding of the tremendous impacts future regulations may have.

Further, this flurry of activity was occurring during the COVID-19 pandemic which further limited a fulsome recognition of the significant issues being considered. Based on a fact sheet provided by NJDEP, the establishment of “new regulations to govern and aggressively reduce emissions of carbon dioxide”¹ will be issued in January 2021.

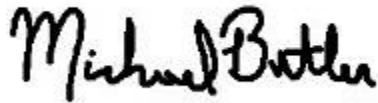
While CEA certainly appreciates the interest of the NJDEP to move expeditiously to meet its stated objectives, the sheer pace of activity and truncated timeline to fully understand the impacts and totality of these potential regulations – which would cover every facet of the state’s economy- warrant more time and consideration. As was mentioned during the public listening session, NJDEP signaled their interest in receiving more input on these complex issues. Providing additional comment opportunities and input sessions would ensure more public buy-in and a greater chance that the NJDEP will more effectively meet its goals and objectives.

In addition, this new set of potentially sweeping regulations would also be overlaid on top of the Administration’s comprehensive Energy Master Plan, the Straw Proposal for EV Infrastructure put forward by the New Jersey Board of Public Utilities and with the state’s interest in joining the Transportation Climate Initiative. It would be better public policy-making, and likely better for consumers and those on fixed incomes, to take a few moments in the regulatory process to better understand how all of these proposed programs will function with each other and avoid duplicity and unnecessary costs. A recent study by Continental Economics, an energy and economic consulting firm, estimates that aspects of regulatory proposals to retrofit New Jersey’s nearly two million single-family homes, 350,000 apartments and thousands of restaurants and other commercial businesses that rely on natural gas for heating, hot water, and cooking would alone cost \$65 billion.

¹ <https://www.nj.gov/dep/njpact/docs/njpact-regulation-chart.pdf>

We appreciate the opportunity to offer these comments and stand ready to work with NJDEP and all stakeholders to ensure that consumer and family budgets are protected while we are advancing greater environmental stewardship in New Jersey.

Sincerely,



Mike Butler
Mid-Atlantic Executive Director
Consumer Energy Alliance