



September 17, 2020

Submitted via email to the New Jersey Department of Environmental Protection

Re: Comments on reducing carbon emissions from EGUs in New Jersey

Environmental Defense Fund (EDF) appreciates the effort the Department of Environmental Protection (DEP) is undertaking to develop rules that reduce climate warming pollution from EGUs as well the opportunity to comment on the rules under consideration.

The rule should reduce emissions in line with the mandated reductions of the Global Warming Response Act (GWRA). DEP should put regulations in place that act as a backstop to ensure the state meets the requirements of the Global Warming Response Act, which requires New Jersey to reduce statewide GHG emissions to 80% below the 2006 level by 2050. Further, Executive Order 100 states that “the only method to begin mitigation is through steep and immediate reductions in greenhouse gas emissions.” To achieve the requirements of these mandates, DEP should target clearly defined pathways for achieving emission reductions on a timeline that is compatible with the state’s targets.

An enforceable declining limit on GHG emissions from EGUs can guarantee the emissions outcome by ensuring actual reductions in the amount of climate warming pollution entering the atmosphere. Critically, what matters to the atmosphere is not GHG emission rates at individual facilities, but absolute reductions in global concentrations of greenhouse gases.

In establishing rules for EGUs, DEP should focus on the emission reduction potential for the electric power sector and aim to achieve reductions in line with what is needed to achieve the economy-wide goals. This would require an assessment of how much emission reduction is necessary from EGUs to achieve the mandated GWRA targets so that DEP can structure the rule to achieve the necessary emissions level.

EDF commends the department for undertaking this effort and appreciates your consideration of these comments. We look forward to future opportunities to engage in the development process and provide additional feedback.

Sincerely,

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