September 16, 2019

FROM: Jennifer M. Coffey, Executive Director Association of New Jersey Environmental Commissions P.O. Box 157 Mendham, New Jersey 07945

RE: Comments on the Draft 2019 Energy Master Plan

The Association of New Jersey Environmental Commission (ANJEC) would like to thank the Board of Public Utilities and the Energy Master Plan Committee for undergoing the extensive stakeholder process and creating additional hearings to ensure diverse input.

Overall, ANJEC largely supports the draft Energy Master Plan. The document represents a wide breadth of improvements to New Jersey's energy sectors, particularly focusing on the two largest emission sectors: buildings and transportation. With recent reports outlining the specific and urgent need to reduce greenhouse gas emissions and address the climate crisis, the need for leadership has never been stronger.

We would like to address a few topics in the EMP, including:

- 1. Definition of "clean energy";
- 2. Transportation; and
- 3. Accessibility to clean energy.

1. Definition of "clean energy"

While we support the transition away from fossil fuels outlined in the EMP, we do not support the use of the language "carbon neutral" to describe the clean energy future. This could keep the door open for natural gas to linger in our state longer than is necessary. We need to focus on reducing our dependence on natural gas, which is not a clean energy, and should be pointed out as so in the plan. Additionally, it is imperative that the state should deny all new and proposed fossil fuel projects and infrastructure. These projects would not only run contrary to the goals set by the Murphy Administration, they will endanger the state and make it nearly impossible to reach the Global Warming Response Act goals of 80% reduction in greenhouse gas emissions by 2050 from 2006 levels.

2. Transportation

New Jersey's largest greenhouse gas emitter is our transportation sector, therefore it makes sense to prioritize moving towards electrification in this sector. NJ Transit should not be moving toward or keeping the door open for "renewable natural gas" and instead should be working towards a goal of an entirely electrified bus fleet by 2040 or sooner. We ask that NJ Transit receive an increase in funding so that this goal can be reached. This is especially important around our ports, where the air is disproportionately toxic compared to the rest of the state.

Also, energy and transportation planning should be integrated into land use and housing planning at both the state and local level, while not placing unreasonable burdens on local governments This kind of prioritization will help reduce vehicle miles traveled (VMT) by

encouraging municipal law to create walkable and bikeable communities.

3. Accessibility to clean energy

Low and moderate income (LMI) and environmental justice communities need to have equitable access to the clean energy transition; this version of the EMP does not address the barriers preventing these communities from partaking in this transition. We recommend the BPU convene stakeholders and customers from these communities to note specific needs within LMI and environmental justice territories.

Additionally, while the EMP discusses workforce development plans, we encourage the Administration to make clear how residents in environmental justice communities will be given a demonstrable path to job training and development. This will remove another barrier to the clean energy transition.

Renters are also completely left out of the EMP. We ask the Administration to explore and identify ways renters can take advantage of clean energy programs.

We also encourage the BPU to publish the Energy Master Plan in more languages than just English, including Spanish and other languages predominantly spoken in our state. This will ensure the document is accessible to all New Jersey residents.

In conclusion, ANJEC applauds the administration for its work on this plan and looks forward to achieving 100% clean energy for all New Jerseyans. If you have any questions, please contact Jennifer M. Coffey at jcoffey@anjec.org or (973) 539-7547.

Sincerely, Jennifer M. Coffey Executive Director

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