

Brian Lestini – 2019 Draft EMP written comments
September 13, 2019

I am a taxpayer and voter from Burlington County. I am also a physician and father of two young children. I am providing these comments on behalf of myself and my family, and also as a volunteer of GreenFaith, a New Jersey-based, international, interfaith environmental organization founded in 1992, representing over 10,000 thousand members of diverse faith backgrounds.

I would first like to applaud BPU for acknowledging head-on the serious risks that climate change pose to New Jersey. We are among the states experiencing the fastest rates of warming, dramatic loss of property values along our shore, and frequent inundation from stormwater flooding. There are also real risks to our public health, as we experience some of the worst air quality in the country, and exceed 1 million New Jerseyans who suffer from asthma and other respiratory diseases. As a state, we clearly have much at stake.

The following are my comments on the draft EMP:

Section IV (p 24): BPU is correct to point out the need for new rate structures to incentivize energy reduction, and to critically evaluate new and future gas infrastructure projects, as these are not compatible with the stated goals and, if built, likely represent a high risk of stranded assets, the cost of which will be borne on the backs of ratepayers in particular those in low- to moderate-income (LMI) and environmental justice (EJ) communities.

Section V (p 26): New Jersey and BPU must work to ensure that the “supportive community” include PJM, as some members have not adopted these goals and therefore represent a risk for NJ to be able to confidently and economically achieve the stated goals of the EMP.

Strategy 1: I support the bold actions proposed for clean transportation initiatives, as these represent a significant plurality of our greenhouse gas emissions. It is vitally important in setting these ambitious - yet realistic - goals, to rapidly phase out motor gasoline and conventional diesel consumption.

As such, in addition to providing state incentives for vehicle electrification, you must work closely and assertively with the legislature to ensure proper policies for: charging infrastructure; electrification of New Jersey Transit and airports; and, importantly, ensuring that low and moderate income and environmental justice communities are able to access and take advantage of this transformation. In particular, these communities will benefit not only from the decrease in greenhouse gases, but also other emitted pollutants that adversely and disproportionately affect their health.

With regards to mass transit, BPU should be clear that efforts to build new natural gas-fired power plants or increase use of renewable natural gas are in direct contradiction to the stated goals and should not be pursued. BPU should work with community organizations such as churches, schools, municipalities and community boards to gain input, buy-in and ensure equity for this massive overhaul of our transportation sector.

Additional comments for Strategy 1:

- Goal 1.1.2: working closely with municipalities and through public-private partnership to stimulate zoning, building codes, and infrastructure is vital.
- Goal 1.1.8: it is vitally important that New Jersey advance policies and incentivize technologies that spur innovation and implementation of hydrogen fuel cells.

- Goal 1.3 (port electrification): Emission reduction goals and examples of achievements are good; however, there needs to be a much more robust set of tangible incremental goals and milestones as to how the overall goals will be attained.

Strategy 2: the current definition of “clean energy” as proposed by BPU is far from sufficient and a serious flaw in the draft EMP. Given the urgency of climate change in New Jersey and the immediate steps needed to mitigate it, we must do much better than “carbon neutral.” Defining clean energy as carbon-neutral is in direct contradiction to BPU’s own emphasis in the EMP as to the role of electricity generation from natural gas, accounting for 20% of New Jersey’s GHG emissions, as well as BPU’s call for minimizing reliance on natural gas. BPU must work with the legislature to build upon the Clean Energy Act and the RPS, defining “clean energy” as zero-carbon and specifying 100% class 1 renewables as our ultimate 2050 RPS goal, including electricity destined for both in-state and out-of-state use.

Anything less means that fossil fuel projects will continue to be built – and potentially stranded – such as the Southern Reliability Link pipeline that will travel through my county and put the safety, health and well-being of residents along its proposed path at risk, with threat to life, property and safe drinking water sources. Furthermore, allowing polluting natural gas infrastructure to be built will continue to put EJ communities at risk, as it is well documented that these communities disproportionately bear the brunt of pollution emitted by plants built in such areas. As a most extreme example, claiming to be champions in combating climate change while allowing the proposed port for exporting liquefied natural gas in Gibbstown is completely disingenuous.

The stated 80 X 50 goal is more appropriate; however, we must be aspirational and aim to reduce omissions to zero by 2050. Furthermore, we should actually strive to achieve negative emissions, using proven methods such as reforestation, or future methods of carbon capture and storage.

Additional comments for Strategy 2:

- Goal 2.1.1: New Jersey and BPU must work to dramatically decrease reliance on out-of-state REC’s to satisfy the RPS, as per the BPU’s own admission that this approach does not adequately benefit NJ specifically.
- Goal 2.1.4: Continue to emphasize that the legislature must be engaged to grant BPU the necessary and appropriate authority to meet our clean energy goals.
- Goal 2.1.8: It is appropriate and important for BPU to prioritize solar project installation away from open space.
- Goal 2.2.1: It is appropriate that BPU be aspirational, and aim for offshore wind generation well beyond the initial 3.5 GW goal.

Comments for Strategy 3:

- Goals 3.1.2 and 3.1.3: The final EMP should retain emphasis on ensuring Clean Energy Programs are aligned with goals, and further emphasize ensuring access to programs and financing for LMI communities.
- Goal 3.1.3: The final EMP should retain language calling for establishment of a state Green Bank; however, the scope of the proposed Green Bank should be expanded to ensure adequate capital allocation to achieve clean energy goals, not just energy efficiency projects.

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- Goal 3.3.3: I agree with mandating an aggressive target for energy efficiency points in the LEED certification process.
- Goal 3.3.7: In addition to calling for increased appliance efficiency standards, the BPU should propose a “cash-for clunkers” program, or other programs, to stimulate turnover of lower-efficiency appliances, particularly in LMI communities.

Strategy 4: I fully support BPU’s stated goal for decarbonization of the building sector by 2050. This must include programs to help address building emissions in LMI/EJ communities, both residential and commercial. I also fully support BPU’s position that moving away from natural gas heating is essential, both for ensuring clean energy goals are met, and also to minimize stranded assets and the burden to ratepayers. This language must be specifically retained in the final EMP.

Additional comments for Strategy 4:

- Goal 4.1.2 and 4.1.3: BPU should propose programs to incentivize electric heat pumps and other low-carbon or carbon-neutral heating technologies, potentially as part of an expanded Clean Energy Program or alternative rebate system.

Comments for Strategy 5:

- Goal 5.2: The final EMP should retain language calling for the state to advocate for federal/regional control of transmission rates, and mandate review for necessity and fairness of transmission projects.
- Goal 5.3.4: it is critically important that resolving the issue of compensation for growth in sales and double compensation of utilities is extended beyond electricity to include natural gas, in order to drive down demand for new natural gas infrastructure.
- Goal 5.4: Please change the following sentence to read “NJBPB should require all gas distribution companies to incorporate advanced leak detection technology...” Leak detection should be standard and mandated on all modern natural gas infrastructure.

Strategy 6: It is commendable that BPU has explicitly focused on ensuring LMI and EJ communities benefit from the clean energy transition. In order to ensure these intentions are put into practice, BPU should work closely with community and faith groups, schools and municipalities to understand on-the-ground needs, ranging from transportation, to building efficiency, to job-skills training.

BPU should also explicitly emphasize the importance of incentivizing building efficiency (both for new and existing construction) in LMI communities, as these structures are more commonly older and less energy efficient, resulting in higher costs for individuals and businesses. Advanced building efficiency are also less likely to be incorporated in buildings in LMI communities due to increased costs.

Strategy 7: I fully support BPU’s call for establishing a New Jersey Green Bank, and this should be retained in the final EMP.

Additional comments for Strategy 7:

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- Goal 7.7.1, last paragraph: BPU should lay out an explicit timetable for generation of a final product of recommendations for a workforce needs assessment.
- Goal 7.6: as part of the Clean Buildings Hub, ensure expertise in retrofitting buildings typical in LMI communities, as well as affordable housing developments throughout all municipalities in NJ.

For all strategies, it is vitally important that BPU work in conjunction with the relevant departments and legislature, to set tangible intermediate targets that will ensure the long-term goals of this EMP are achieved, with the requisite degree of urgency that the situation requires.

In summary, with this broad platform, BPU has taken a great step forward- but you must go all the way. Somewhat bold is not bold enough. Zero-carbon is the right choice for our health and for our economy, and is achievable. Current and future generations are counting on it.