



COMMENTS on BPU's Integrated Energy Plan (IEP) - 11/15/19

Per BPU's request for "IEP Feedback", Clean Water Action and David Pringle Associates makes the following comments complimenting 2 previous submissions from earlier today we co-authored and co-signed under the Empower NJ and Jersey Renews covers and incorporates by reference the comments we submitted on the Energy Master Plan dated 9-15-19.

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While we appreciate that the development of the IEP was well underway by the time of the EMP comment deadline, we are disappointed to note that we have not detected any significant effort to address the concerns laid out in those comments since then. This is perhaps best demonstrated by the IEP process and substance laid out between the faux stakeholder meeting on October 16, 2019 and today's close of public comment.

In 2018, the scientific community said [we have until 2030 to make immediate and bold changes](#) (45% cut in greenhouse gas emissions) or suffer grave environmental and economic consequences from anthropogenic climate change.

If immediate and bold steps are taken, New Jersey is poised to be a leader on the climate crisis battleground with huge economic benefits. However, that won't happen if the IEP, which uses a 30-year timeframe rather than a scientifically-backed 10-year timeline for major emissions reductions, isn't significantly improved - including a much greater focus on the next decade.

Just last week, over [11,000 scientists worldwide declared](#) "clearly and unequivocally that planet Earth is facing a climate emergency" and called for "massive energy efficiency and conservation practices", "quickly cutting emissions of short-lived climate pollutants, such as soot and methane" (aka black carbon), and "a carbon free economy".

While the IEP takes a holistic view of NJ's economy wide emissions including transportation, electricity generation, and buildings and evaluates nine different energy blend scenarios to achieve clean energy goals, including a "lowest cost" blueprint, the IEP fails to:

1. Model several critical scenarios: a) front loading emission reductions, especially in environmental justice communities, to achieve the 45% cut by 2030 called for by the scientific consensus and 50% renewable electricity by 2030 as required by the Clean

Energy Act; b) 7,000 MW of offshore wind by the 2030's; and c) more aggressive transition of electric vehicles

2. Account for either the global warming potential of short-lived climate pollutants such as black carbon or climate, health, and total life cycle costs of various energy scenarios -- BPU should be leading with economy wide savings as opposed to "just lowest cost"
3. Be flexible utilizing the best of some scenarios now (the least cost option through 2044 is not the "least cost" option but rather the let the nukes expire and no new gas plants scenario) and others later
4. Include meaningful public input
5. Account for any mechanisms or recommendations on how to regulate greenhouse gas emissions

In its current form, the IEP will not put the state on track to slash GHG emissions by 45 percent by 2030, achieve Governor Murphy's goal of 100 percent by 2050, or comply with the legal mandate to reduce GHG emissions by 80 percent by 2050.

New Jersey can, should and needs to be more of a global leader in addressing the climate emergency. BPU needs to fix these critical deficiencies in the IEP and EMP to do so.

Clean Water Action has more than 150,000 members statewide in New Jersey and is the nation's largest grassroots group focused on water, energy and environmental health. Since our founding during the campaign to pass the landmark Clean Water Act in 1972, Clean Water Action has worked to win strong health and environmental protections by bringing issue expertise, solution-oriented thinking and people power to the table. We will protect clean water in the face of attacks from a polluter friendly Administration and Congress. www.cleanwater.org/nj