



Via electronic submission to emp.comments@bpu.nj.gov

November 15, 2019

TO: Aida Camacho, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314, CN 350,
Trenton, New Jersey 08625

FROM: Norah Langweiler, Jersey Renew's Campaign Organizer

ABOUT JERSEY RENEWS

Jersey Renew's is a coalition of 60 organizations committed to state-based action on climate change that was launched in January, 2017 in recognition of the urgency of our climate crisis. We are a broad coalition of more than 60 organizations that includes labor, faith, environment, community, business and health organizations advocating for increased investment in clean energy infrastructure, reduced greenhouse gas emissions, and good, family-sustaining jobs.

These comments on the Integrated Energy Plan (IEP) supplement Jersey Renew's' comments submitted September 16, 2019 on the Energy Master Plan (EMP).

On an overall note, 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 flawed stakeholder meeting on October 16, 2019, and the public process since set up currently scheduled to end November 15, 2019.

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” and “quickly cutting emissions of short-lived climate pollutants, such as soot” (aka black carbon).

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 is severely lacking in several crucial areas.

First, the discussion of jobs seems to lack specificity - promises of opportunity but no numbers on what each industry will provide. There should be an analysis of the direct and indirect jobs made available by the renewable industry, as well as the jobs lost and potential overlap of skills to enable a smoother transition.

Further, it fails to model several critical scenarios: 1) 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; 2) 7,000 MW of offshore wind by the 2030’s; and 3) more aggressive transition of electric vehicles.

The IEP does not account for the global warming potential of short-lived climate pollutant such as black carbon nor 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”.

Finally, the IEP lacks flexibility to use the best of some scenarios now and others later, rejects meaningful public input, ignores the potential impact of future key regulatory and technological changes, and does not 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.

Comments co-signed by the Jersey Renewables partners and allies listed below:

Debra Coyle McFadden, Executive Director, New Jersey Work Environment Council
Peggy Kelly, VP/Director of Field Services, United Food & Commercial Workers Local 152
Amy Goldsmith, State Director, Clean Water Action NJ
Doug O’Malley, Executive Director, Environment New Jersey
Rev. Fletcher Harper, Executive Director, GreenFaith
John Reichman, Environmental Committee Chair, BlueWaveNJ
Walt McRee, Co-Director, Banking on New Jersey
Sid Madison, Central Jersey Coalition Against Endless War
Lou Kimmel, Executive Director, New Labor
Richard Lawton, Executive Director, New Jersey Sustainable Business Council
Jeff Tittel, Executive Director, New Jersey Sierra Club
Pari Kasotia, Mid-Atlantic Director, Vote Solar
Rabbi Ethan Prosnit and Liz Cohen, Co-Chairs, Reform Jewish Voice of New Jersey