

## Belmonte, Juan

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**From:** Pat Miller <patmiller@comcast.net>  
**Sent:** Wednesday, November 13, 2019 4:00 PM  
**To:** comments, EMP  
**Subject:** [EXTERNAL] IEP Feedback  
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To: [emp.comments@bpu.nj.gov](mailto:emp.comments@bpu.nj.gov)  
Subject: IEP Feedback

Feedback on NJ 2019 IEP  
Patricia Miller, Co-Founder, Middletown for Clean Energy  
Member, Climate Reality and Sierra Club Ready for 100  
Middletown, NJ

I applaud the approach taken to modeling in which the cost of any scenario is compared to the cost of business as usual. It is heartening that the Least Cost Plan costs barely more than doing nothing.

However, you seem to have been over-conservative in every respect.

- You say you take a conservative view of the costs of renewable energy. As a retired professional telecomm forecaster, I would anticipate that the costs of any new technology will almost certainly come down much faster than you predict.
- You expressly leave out the benefits from your cost/benefit analysis.
- Apparently, you also are not accounting for the fact that the cost of fossil fuel energy will continue to rise, especially when any form of carbon pricing goes into effect.

Any or all of these would result in a lower cost scenario for a faster reduction in carbon, with a goal of zero emissions by 2050.

All scenarios have an end goal of the existing legally binding regulations: 80 x 50, and 100% clean electricity. This will NOT meet the IPCC 2018 recommendations to avoid global catastrophe – 45% reduction in emissions by 2030 and 100% carbon free by 2050. I cannot accept your assumed constraint, since the #1 goal of Middletown for Clean Energy and my personal mission is to leave a livable world for our children and grandchildren, and 80 x 50 won't do it.

Most importantly, your charts seem to show that emissions begin to decrease immediately, which would require an immediate moratorium on any new fossil fuel infrastructure. But you do not say this. It needs to be said explicitly. Furthermore, we must count ANY emissions, whether they are in state or out of state and not build to facilitate any increase in emissions. Period.

Finally, any plan needs to be followed up by specifying and enacting the laws, regulations and ordinances to make it happen. These must be put into place immediately before any more development happens in NJ that would preclude starting to lower emissions.

Thank you,

