

Comments to the New Jersey Board of Public Utilities (NJBPU) on the 2019 Draft Energy Master Plan

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Dear NJBPU:

As this is the last day for comments on the 2019 Draft Energy Master Plan (EMP), here is my entry. I have either testified and/or sent you comments on various editions of the EMP a number of times over the years, and one of my classes once sent you comments, too. This will be the final time.

I have been involved in energy issues, on-&-off-&-on, in different roles as a Sustainability Change-Agent in New Jersey, over 40 years. I have: (a) worked with the NJBPU and it was a member of the inter-agency sustainable state committee I managed at the NJDEP. NJBPU speakers gave a few talks at a seminar series I co-ran there. I also co-catalyzed NJDEP's initial climate change efforts; (b) attended BPU conferences; (c) was on a BPU Education committee; (d) worked on energy issues as a volunteer with two environmental groups; (e) taught two semesters of Energy Policy at a Ramapo College, arranged with the then-NJBPU President to have some guest speakers at the class, and facilitated three energy panels at a conference at the college, including a plenary with her; (f) gave and facilitated talks and wrote articles (see below) on climate change in New Jersey; (g) was a Senior Fellow at Fairleigh Dickinson University's Institute for Sustainable Enterprise; and (h) am a perpetual student, currently pursuing a Ph.D. in sustainability at Erasmus University in the Netherlands, focusing on Sustainable Transformational Change.

To some degree I'm comforted that New Jersey now recognizes the climate change problem, its urgency, and that State Government, environmental groups and other non-profits, academics, and some journalists have begun serious efforts to address it. This had not been the case. Therefore, it's not a bad time to leave this turf, but, that doesn't mean you're not still missing parts of key elements of what will likely be necessary.

I understand and applaud you for asking for guidance on 28 specific questions, but this time I cannot deeply sort through those needs. I hope you are getting sufficient input from others. Still, it should be helpful in thinking about your Question 11: "What policy, legislative, or regulatory mechanisms can New Jersey develop to ensure that it can most cost-effectively pursue a 100% carbon neutral power sector?;" the three questions which are part of "Strategy 7: Expand the Clean Energy Innovation Economy;" and indirectly helpful for some others.

However, mostly this time I offer a meta-look; that is, an overall "big-picture," "what are we missing," "what do we need to do (or think) differently" perspective?

Before I get to that, I offer some conclusions based on my skimming of the Report. Of course, there are many good points, including but not limited to the major goals (e.g. 100% clean energy, and 80% greenhouse gas reduction, both by 2050, and 50% renewables by 2030), and the majority of the direction; your pretty comprehensive knowledge of the energy field; the study contracted to Rocky Mountain Institute (something I wished was done decades ago); the mention of PACE financing; the carbon-neutral new technology incubator; research and development (which had been dropped over the years); the pleasant surprise of seeing green infrastructure included.

The above goals, while impressive, necessary, and bold, may have to be accelerated even further as the news about climate change continues to worsen. You will probably need, and have to call on, a contingency plan.

However, what I list below are: a) where key points are mixed; that is, while present, an important area appears too lightly covered, sometimes a little and sometimes a lot; and (b) one key area which appears totally missed.

The areas of the Draft which are mixed, with too minimal or not enough emphasis of a key point are:

- While the document's "Endnotes" is impressive, showing familiarity with a range of both primary and secondary sources, none of the documents I have sent you or State Government are referenced. If these publicly available documents are unknown to you, then there is a different sort of meta-problem. How are you supposed to innovate, something you cite (see below) if there is not an adequate channel for you to receive, and a culture to allow for pondering, new ideas?
- **Sustainability.** While some of its concepts are implicitly included, what is missing are using it as overall frame for the entire area, many of its concepts including values, tapping into the initiatives around the state that involve it, the necessity to keep up with developments in the field
- The use of the key concepts "**Transition**" and "**Transformation**" are very understated. Without fully realizing it, perhaps, New Jersey has begun what is being called a "Sustainability Transformation." This European-oriented concept (and sub-field) offers frameworks and ideas that could be useful for the state. However, one aspect of this that even they are not aware of is that a "Transformation" has to mean, at least potentially (if not practically), that "everything has to be on the table." That is, **business-as-usual** policy, processes, thinking, assumptions may have to be re-thought. Very importantly, New Jersey is not going to get there through even incrementally positive improvements to how it's used to doing things. Now, in reality, it is impossible to re-think literally everything, at least at any one time, but you do have to be open to questioning conventional practices and assumptions as they come up, including from those who interface with you (or try to). And by no means is it just the NJBPU. Note this very [recent article](#) and my comments about it about concerns over alleged "costs" if the EMP, as drafted, is finalized. There is nothing in the article itself on the fundamental concept of externalities or sustainable businesses who

would likely support the new energy goals. That kind of journalistic practice reflects what one article below calls the prevalent “there’s nothing new under the sun” mindset widespread in several sectors that impact or are involved with energy in New Jersey (as well as other issues) and has to be challenged

- While the Draft states: “Minimize reliance on natural gas as the state transitions to a clean energy economy,” I, like others, currently don’t see how this can be squared with biting the bullet on proposed new infrastructure involving natural gas. I recognize that banning new gas pipelines and compressor stations can be a politically and economically painful decision, but don’t see an alternative. A formal European-informed “Transitions” process might help both you and our state to come up with a way to address this “Elephant in the Living Room”
- Other concepts which are mentioned, but either somewhat or badly understated are externalities (the Document continues to emphasize “least cost,” which implies conventional market pricing, not at all the same thing; education (see that section in this [recent article](#)); pilots; learning from international experience (e.g. such as Germany’s prominent transformation of their electricity sector, both for better or worse), and to some extent from other states; seeking renewable energy use by the commercial and industrial sectors; innovation; financing, the Green Bank and the role of EDA, which are not bad, but miss the potential huge incentive of linking **all** EDA financing, for nearly any reason, to sustainable ends. This idea should not get lost in the controversy about this agency; green jobs (which also is pretty good, but misses the idea, and taking seriously, that “all jobs can be a green job,” recognition that businesses don’t necessarily know all required job skills, and the importance of learning lessons from previous such efforts; neither sustainable business (or similar expressions like corporate social responsibility, B Corps, regenerative businesses are never used), beyond just clean energy companies, and their potential to help New Jersey meet its public policy goals (a major theme of the “Green Economy” reports I list below); the use of the state’s universities (it’s still, though, only the usual players); terms like “systemic” and “holistic,” bicycling (very badly understated); “Advocate for net zero carbon buildings in new construction,” but with no mention of “Living Buildings;” the well-thought out support of the wind sector, but I saw nothing on minimizing environmental consequences; and strategic partnerships with industry.

A Concept which is totally missed is:

- The use of the field of psychology, and related fields, which now have a literature on behavioral change as applied to energy.

I have mentioned many of these in comments on other drafts of EMPs over the years.

The bulk of my contribution is to offer you these articles and a report I have either written, co-written, edited, or worked with my students to produce. I can’t now summarize specific key points that could be very relevant, including those that relate to some of your specific planning needs.

Here are those articles and reports:

- 1) "New Jersey Now 'Gets' Climate Change. What We Are Still Missing: Introduction: Part 1," with Lawrence Furman, Jonathan Cloud, & Caitlyn Montgomery. GreenEconomyNJ.org. October 15, 2018. <http://greeneconomynj.org/2018/10/15/new-jersey-now-gets-climate-change-what-we-are-still-missing-introduction-part-1/>
- 2) "New Jersey Now 'Gets' Climate Change. What We Are Still Missing: Starting with Organizational Culture: Part 2," with Lawrence Furman. GreenEconomyNJ.org. October 22, 2018. <http://greeneconomynj.org/2018/10/22/new-jersey-now-gets-climate-change-what-we-are-still-missing-starting-with-organizational-culture-part-2/>
- 3) "New Jersey Now 'Gets' Climate Change. What We Are Still Missing: 'From Government and Really Helping:' Part 3," GreenEconomyNJ.org. October 28, 2018. <http://greeneconomynj.org/2018/10/28/new-jersey-now-gets-climate-change-what-we-are-still-missing-from-government-and-really-helping-part-3/>
- 4) "New Jersey Now 'Gets' Climate Change. What We Are Still Missing: Why We're Not Talking About What We're Not Talking About: Part 4," GreenEconomyNJ.org. January 3, 2019. <http://greeneconomynj.org/2019/01/03/new-jersey-now-gets-climate-change-what-we-are-still-missing-why-were-not-talking-about-what-were-not-talking-about-part-4/>
- 5) "New Jersey Now 'Gets' Climate Change. What We Are Still Missing: Focus State Support for a Carbon Tax at the Federal Level: Part 5:" Mike Aucott, January 20, 2019. GreenEconomyNJ.org. <http://greeneconomynj.org/2019/01/20/new-jersey-now-gets-climate-change-what-we-are-still-missing-focus-state-support-for-a-carbon-tax-at-the-federal-level-part-5/#comment-30>

(Note that while I edited this one, I don't agree with its conclusion that a carbon tax would be inappropriate at the state level.)

- 6) "New Jersey Now 'Gets' Climate Change. What We Are Still Missing: A Climate Vision for Montgomery County, Maryland: Should We Be Doing This in New Jersey?: Part 6," Herb Simmens, March 11, 2019. GreenEconomyNJ.org. <http://greeneconomynj.org/2019/03/11/new-jersey-now-gets-climate-change-what-we-are-still-missing-a-climate-vision-for-montgomery-county-maryland-should-we-be-doing-this-in-new-jersey-part-6/>

I hope and anticipate four more "Parts" to this Series. Three of these will be psychology-oriented, with the first on ideas to tackle the widespread mindset barriers discussed in "Part 4." These are things we do to ourselves; that is, obstacles for which we can't blame others. If you wish to receive them if I am able to write them, let me know.

Also, although it de-emphasizes the energy dimension, it is still highly relevant, given the Draft's discussion of the similar "Clean Energy Innovation Economy," are my class and my report:

- 7) "A Green Economy for New Jersey: A Proposal to the New New Jersey Governor Phil Murphy," with Ramapo College class; & "Postscript: Going Wider and Deeper with the Green Economy," June 12, 2018.  
[https://www.ramapo.edu/mass/files/2018/06/PolskyA\\_Green\\_Economy\\_for\\_NJ.pdf](https://www.ramapo.edu/mass/files/2018/06/PolskyA_Green_Economy_for_NJ.pdf)

(This one also has an extensive References section, with summaries, of many previous reports about New Jersey.)

There was also a class report on "Defending the Green New Deal: Recommendations To Build On What's Actually In It While Reaching Out To Others," although this one was aimed at the federal level. Still, it could have insights for New Jersey. Let me know if you'd like a copy.

I wish New Jersey success in achieving its bold, but necessary, renewable energy goals and carbon reduction goals.

I hope that while I have no particular reason to believe it, my efforts over the years have been helpful to the NJBPU and to those it serves, and will be both for the final EMP and as you move into tackling those very ambitious goals.

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