



New Jersey Environmental Lobby

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Comments on the 2019 Draft Energy Management Plan from the New Jersey Environmental Lobby

NJEL is a non-partisan 501 (c) 4 organization focusing on legislation and policies that affect New Jersey's environment and natural resources. The NJEL Board has approved the following comments on the Draft Energy Management Plan (EMP).

The Draft EMP is an excellent reference document about New Jersey's energy network. It should be required reading for all New Jersey residents and public officials. It was obviously well researched and the presentation is well-organized. However, it is difficult to make judgements about important parts of it because of the absence of results of underlying analyses & studies. A number of specifics about how to reach the 2030 and 2050 goals are missing because supporting plans and studies are not yet complete. The Plan states that supporting information will be incorporated into the final EMP. We look forward to the information.

The Board of Directors of NJEL believes that this EMP is the beginning of a path toward sustainability and reliability, a path that New Jersey has been waiting a long time to tread. However, we would like to point out what we see as deficiencies.

A serious one is the implication that natural gas and biomass are "clean" fuels. In terms of emissions, natural gas may be cleaner than coal, but is it not "clean," particularly in the extraction. Natural gas is a significant part of the current portfolio, but describing it as "clean" gives the sense that the status quo is acceptable. Related to this concern is the passage "We must model scenarios and pathways to achieve 100% clean, carbon-neutral electricity generation by 2050 with an emphasis on least-cost options." How will "costs" be defined? For decades, fossil fuels have been deemed to be less costly than alternatives because of the failure to include the costs of early death, disability, health care, and natural resource damage. This policy statement could facilitate "pathways" that might favor natural gas because it is deemed "clean." "Pathways" should lead to fossil-free generation and NJEL urges that references to "clean" be replaced by "fossil-free."

We applaud the concept of a Green Bank to encourage investment in resiliency, efficiency, and particularly renewable energy development. Again, though, we take exception to the term "clean" energy rather than fossil-free because we see an opening for the Bank's resources to be made available to natural gas and biomass projects. A Green Bank must be designed so that its operation is transparent, free of political influence, and has an **effective** public participation element. Well-intentioned public investment programs can be diverted to unintended and ineffective purposes and at worst, can be perverted by back room deals.

We also applaud the attention paid to Strategy #3: Maximize Energy Efficiency and Conservation, and Reduce Peak Demand. However, we urge that the BPU not wait for the final EMP before ruling on projects that utilities have already proposed. Environmental organizations do not always agree with public utilities, but in the case of efficiency and reducing peak demand, the utilities are experts. Energy efficiency strategies will have an immediate and measurable effect on reducing demand, and they should be noncontroversial. The experience and technology are there. There should be no further delay in adopting additional programs.

Finally, we suggest an addition to the final EMP. We see no reference in the draft to forestation as a carbon sequestration tool. Trees are natural carbon storage facilities. According to the most recent UN Intergovernmental Panel on Climate Change, deforestation has increased greenhouse gas emissions. We must not only protect New Jersey's trees from destruction from development and irresponsible harvesting, but also plant more. No lengthy research is necessary. There are already viable forest management plans. A plan endorsed by New Jersey conservation organizations should be incorporated in the EMP.

Respectfully submitted,

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