



September 16, 2019

New Jersey Board of Public Utilities  
44 S Clinton Ave,  
Trenton, NJ 08625

**RE: Business Comments on the Draft New Jersey Energy Master Plan (EMP)**

Dear Members of the EMP Committee:

As businesses and investors with significant operations or investments in New Jersey, we write to provide comments on the draft Energy Master Plan (EMP) put forth by the Murphy Administration. We commend the Governor’s ambition to put the Garden State on a path toward 100% clean energy by 2050 and to make the state a national leader in tackling climate change in ways that will make the economy both stronger and fairer. Policies that support investment in clean energy and clean transportation help businesses lower costs, reduce exposure to the volatility of fossil fuel prices, and increase competitiveness. We appreciate the opportunity to comment on the EMP process, and offer input on four key issues important to the business community.

**Increase Deployment of Renewable Energy Resources**

Policies to increase the deployment of and access to clean energy resources will help New Jersey keep electricity rates low in the long term, reduce emissions, and keep the Garden State competitive as neighboring states are doubling down on clean energy investment. Strong policies would align well with the expectations of the business community, as nearly half of Fortune 500 companies have set at least one clean energy target. New Jersey can generate additional low-cost clean energy resources through mechanisms such as updating solar incentives to encourage investment in new projects, implementing a strong community solar program, expanding net metering (including virtual / group net metering), and increasing the already impressive 1,100 MW solicitation and the target for offshore wind resources. We were pleased to see the passage of an increase to the Renewable Portfolio Standard last year, and look forward to working with you to double down on New Jersey’s clean energy leadership.

**Reducing Energy Consumption**

As large energy users, businesses are making major investments in energy efficiency because it helps us cut energy waste, save money, and quickly gain a return on investments. As reported in the recent ACEEE report, New Jersey falls well below most of its neighbors in the Northeast on energy efficiency, and there are tremendous opportunities to expand the Garden State’s leadership over the years to come. The 2015 Energy Master Plan found that each dollar invested in energy efficiency saves New Jersey ratepayers between \$1.80 – \$4.29 in energy costs. New Jersey can capture this missed potential by ensuring that implementation of the Act Concerning Clean Energy (A-3723), which passed this year,

fosters additional utility energy efficiency investments as intended. This can be done by ensuring that key energy efficiency programs receive robust and consistent funding, that newly proposed energy efficiency programs are well-designed, and that peak shaving and demand response programs are expeditiously pursued. New Jersey should also ensure that utilities have the proper financial structures to incentivize efficiency, which could be advanced through full revenue decoupling. Businesses stand to make significant investments in reducing their energy consumption, and the expansion of well-designed programs and incentives to support these investments are critical to New Jersey's clean energy future.

### **Clean and Reliable Transportation**

Given that more than forty percent of New Jersey's greenhouse gas emissions come from the transportation sector, it is clear that any attempt to confront climate change will require electrifying the transportation system. We were thrilled to see the first draft of the EMP had transportation as its first section. Businesses are increasingly setting ambitious goals around electric vehicles (EVs) and efforts to reduce transportation emissions. Supportive state level EV policies can help businesses meet their clean energy objectives (when coupled with a clean energy grid), save money on fuel costs, and make long-term plans for the future. The state's target of 330,000 EVs on the road by 2025 is admirable, but we fear that existing policies are insufficient to put the state on a pathway toward meeting it. We strongly encourage the EMP to be explicit in calling for additional policies and incentives to spur electric vehicle adoption across the state while prioritizing the electrification of the public transportation fleet – especially in high density urban areas with the greatest concentrations of air pollution.

### **Regional and National Leadership**

New Jersey is poised to emerge as a national leader in climate action and clean energy investments if the state continues to pursue bold policy solutions. We applaud Governor Murphy's leadership in having New Jersey rejoin the Regional Greenhouse Gas Initiative (RGGI). We encourage the state to closely monitor the program and to continue to aggressively reduce emissions.

We also praise New Jersey for its leadership in designing a regional market-based policy to reduce emissions from the transportation sector through the Transportation and Climate Initiative. As the policy design process continues, we hope New Jersey will continue to be a strong leader in the creation of a bold regional policy that reduces emissions, generates revenue for our struggling transportation system, and prioritizes ensuring that low-income and marginalized communities share in the benefits of the program.

We commend New Jersey for promoting economic development at home by seeking to accelerate our transition to clean energy and advancing the adoption of electric vehicles. We are grateful for the leadership of Governor Murphy, state legislators, and agency heads, and look forward to working with you to help our economy thrive. Thank you for your consideration. Please do not hesitate to reach out with any questions.

Sincerely,

**Ciel Power**  
**DSM North America**  
**Earth Friendly Products**  
**Friends Fiduciary**  
**Hackensack Meridian Health**  
**Hugo Neu**  
**Mars Incorporated**

**M & E Engineers, Inc.**  
**Miller Howard Investments, Inc.**  
**JLL**  
**Tri-State Coalition for Responsible Investments**  
**Unilever**  
**ZaGo Manufacturing**

*For more information, contact John Carlson of Ceres: [jcarlson@ceres.org](mailto:jcarlson@ceres.org), Trina Mallik of the Nature Conservancy: [trina.mallik@tnc.org](mailto:trina.mallik@tnc.org), and Richard Lawton of the New Jersey Sustainable Business Council: [rlawton@njsbcouncil.org](mailto:rlawton@njsbcouncil.org)*