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Comments to the 2019 Draft NJ Energy Master Plan

I thank Governor Murphy and his administration for sharing its Draft 2019 Energy Master Plan (referred thereafter as 'the Plan') and for providing the opportunity to comment on it.

The Plan recognizes the challenges represented by Climate Changes and looks to address them through an ambitious and comprehensive set of actions, articulated through 7 strategies. Those strategies rightly combine reductions in energy consumptions with deployment plans and incentives for renewable energies, grid infrastructure modernization and support for lower revenue communities.

The Plan is however not ambitious enough and must include a moratorium on all new fossil fuel projects. 12 gas infrastructure projects have been identified by the Empower NJ organization, which implementation would clearly not be compatible with the objective of achieving the administration's objective of being 100% carbon neutral by 2050 considering the lifespan of such projects. Furthermore, projects such as the North Bergen Liberty Generating Station are not even meant to satisfy the needs of NJ residents, as the generated electricity is meant to be directed to New York City.

Instead, the Plan should aim at (i) extending the lifetime of existing nuclear plants when possible while enhancing their security, (ii) being more ambitious with respect to solar and wind energy development, and (iii) being more aggressive with respect to the strategies aimed at reducing energy consumption as it relates to commercial and residential buildings.

While I recognize that the first of those recommendations might be contentious, I am of the view that we need to accept that compromises will be necessary within the next 5-15 years in order to facilitate a transition path into full renewable energies. I do believe that such compromise is acceptable if it can participate into avoiding the need to build new fossil fuel infrastructure.

I also support the specific actions proposed by Empower NJ as part of their 'Stop Fossil Fuel Projects' report as listed in the Moratorium section, pp. 15-16, namely:

- "Establish rules pursuant to the Clean Air Act (Title V), the New Jersey Global Warming Response Act and the NJ Air Pollution Control Act that place limits on GHG emissions

and other pollutants, require fossil fuel applicants to conduct a comprehensive alternatives analysis of renewable energy technologies and enable the DEP to reject permits for projects that would cause New Jersey to exceed these limits. (...)"

- "Utilize the NJ Air Pollution Control Act to regulate CO2/GHG emissions. (...)"
- "Revise DEP policies that allow polluters to purchase ozone credits, which today allows virtually unlimited production of ozone precursors even in areas of the State that exceed ozone attainment levels and are already rated as 'F' by the American Lung Association for ground level ozone pollution. (...)"
- "Update the DEP rules regarding air deposition in order to enable rejections of permits that would increase water pollution beyond specific limits."
- "Establish rules requiring all applicants for intrastate fossil fuel projects to provide realistic options for utilizing renewable energy technologies."
- "Remove the cost cap on renewable energy projects, which does not exist on other energy sources."
- "Reverse Governor Christie's rollbacks of regulations on flood hazard rules, water quality management planning rules, the Coastal Area Facility Review Act, Wetlands and Storm Water Management rules that make it easier to build pipelines, other fossil fuel infrastructure developments as well as non-fossil fuel related developments in the Highlands and Pinelands, near water resources and other sensitive environmental areas."
- "Champion a full ban on fracking and its associated activities throughout the Delaware River Basin and in New Jersey."
- "Appoint new members to the Pinelands Commission and Highlands Council, who will protect these fragile areas and the water supplies they provide and act consistently with Executive Order 28."
- "Advise all proponents of the fossil fuel projects that if they continue to move forward on the projects, they do so at their own risk and with the understanding that they may never be built."
- "Create a strong green jobs program including training and placement in the new green economy, built on and driving living wage, union jobs in emerging sectors (solar, offshore wind, electric car infrastructure, efficiency, etc.) with a special focus in environmental justice communities and a just transition for displaced fossil fuel workers."

I thank you again for providing me with this opportunity to comment on you 2019 Energy Master Plan for New Jersey.

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