From: Ray Nichols
To: comments, EMP
Cc: HB Nichols
Subject: [EXTERNAL] 2019 Draft Energy Plan
Date: Monday, September 16, 2019 3:06:59 AM

Please Consider the following comments:

We want to see BPU creat a EMP that reflects the seriousness of the threats that continued Global Warming represents, not merely a catelogue of obvious strategies that could modify the current trajectory of energy consumption from using less oil and coal to using more electricity produced by an unspecified mix of natural gas, nuclear reactions and the burning of garbage.

Electrifying the transportation sector, especially mass transit

The EMP needs to include a complete inventory of existing energy sources within the State, including:
electricity generating plants with their fuel sources and realistic assessment of electrical energy production capacity (taking into account necessary down time, etc.)
Capacity of existing Natural Gas pipelines entering the state, taking into account existing compressor stations and those under construction.
Capacity of oil pipelines entering the state and capacity of existing refineries that deliver fuels (gasoline, diesel, etc.) to NJ consumers.
Identification of the Baseline of Greenhouse Gas creation levels in NJ in 2006, so as to br able to quantify intermediary targets for meeting the GWRA target of 80% reduction below those levels by 2050.

The EMP should assume that due to the age of PSEG's nuclear power plants, the NRC licenses will not be renewed and the electricity generating capacity that each fepreswsents will need to be replace by some combination of reduction in demand and wind and solar generation. Therefore, the dates that the NRC licenses for each of PSEG's nuclear power plants expires should be treated at important intermediary milestones for the successful completion of proposed actions in the EMP.

Under Transportation::

There are a number of publically operated mass transit systems in NJ and around the country that utilize small buses (holding 15-25 passengers) and/or passenger vans to provide inexpensive or even free rides to passengers within a particular geographic area. E.g.
the T.R.A.D.E. van system in Mercer County,
the small buses used to transport Special Needs students to their schools.
In Ann Arbor Michigan, since the 1970s, the Call-A-Ride system has been providing residents living in the less densely parts of that large city with rides to a block in the downtown area where the passengers can easily transfer to any of several buses that travel along the major arteries of that city. Such smaller buses use much less energy to operate that the full

sized buses now used by NJTreansit.

The bus system operated by NJ Transit needs a major energy audit that evaluates the origins and destinations of existing passengers, as well as the schedules. E.g., Are there adequate routs and relevant schedules to take inner city residents to and from job sites in the suburbs?

As the nation's most densely populated state, NJ should be a leader in acquiring electric buses for use in urban and suburban areas. These would also have the benefits of improving air quality in EJ communities and facilitating the ability of poor unemployed urban residents to obtain employment with businesses located in the surrounding suburban areas.

An independent analysis of the use of trucks and truckers to transport shipping containers from the Ports of Newark and Elizabeth is needed to see if a more efficient system can be implemented ted that reduces the idling time for the trucks and examines if the truckers should be treated as independent contractors or employees.

Under Energy Efficiency:
BPU needs to work with DCA and local Building Inspectors to promote tecniques that will encourage landlords of LMI rental units to install insulation and make repairs to windows and doors so that their tenants will be able to use less energy to stay warm in the winter.

Promote the reduction in gas and electricity energy usage for clothes drying by advocating for using outdoor clothes lines and the free Solar and wind energy available for this purpose.

Require all utilities to include inserts with their monthly billing statements that describe how the consumers can save energy and reduce their bills, and that doing so helps reduce Green House Gas production and thus minimizes climate change. It might be best if BPU or Clean Energy staff produced these inserts on a monthly basis for the utilities to use so as to ensure that the messages are really about saving energy and money because reducing energy demand by its customers is not in the best interest of the utility's stockholders!

Building Sector

The Dept of Community Affairs needs to be directed to modernize the standards in the NJ edition of the BOCA Code and the Residential Site Improvement Standards to mandate more energy efficient construction designs such as LEED espouses.

DCA should take the lead in establishing standards for all new construction and renovations of existing buildings must use best available technology and materials so that the future occupants can easily use less energy for heating and cooling than is feasible if builders just adhere to today's standards, which is all they are currently required to do. Doing so will increase the cost of construction, which the builder can recoup, but will simultaneously reduce the operating costs for the building's owners by saving on energy costs throughout the life of the building and reduce future energy demand.

Implementation Considerations:
The draft EMP contained very few cases where the “strategies” included any indication of what might be realistically achieved and by when. Furthermore, it was often unclear who would be the lead organization in implementing a given strategy, what resources were needed to implement the strategy. Therefore, we recommend that the final EMP state its goals and recommendations in the form of S.M.A.R.T. (1) goals, where:
S means Specific, significant and stretching
M means Measureable, meaningful and motivational
A means Achieveable, agreed upon, attainable and action-oriented
R means Realistic, relevant, reasonable, rewarding and reslts-oriented
T means Time based, timely, tangible, and trackable

1. https://en.wikipedia.org › wiki › SMART_criteria

One Example of a SMART goal:
To promote the use of LED lights by residents of economically disadvantaged communities, the BPU’s Clean Energy Program will organize the free distribuion of of 100,000 LED bulbs through non-profit community organizations within one year of plan adoption
Note this goal statement also identifies What, Who, When and the resources needed.

Under Energy Conservation:
All the communities in NJ could benefit from major revisions to the tariffs regulating street lighting. Converting to LEDs would greatly reduce the amount of electricity needed as well as the frequency of needed replacements of the lamps. The tariffs need to be structured so that the municipalities see an actual reduction in their electric bills, while recognizing that the needed changes to the fixtures is a one-time cost. Also, the BPU should require that all street lamp fixtures must be designed and installed so as to direct all light downward and not horizontally or upward.

Thank You for providing the opportunity for members of the public, like me to comment.

If there are any questions about these comments, or additional clarification is desired, please feel free to contact me.

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