From: Dennis Wilson
To: comments, EMP
Subject: [EXTERNAL] Comments on draft EMP Plan
Date: Monday, September 16, 2019 11:00:59 AM

Comments are listed by thequestions listed in the latest notice of Additional Stakeholder Meetings.

General Comments

The EMP taken in its entirety is not nearly aggressive enought to deliver the impact in reducing Global Warming emissions needed to avert the worst of the Climate Cris the globe is experiencing. During just this recent comment period Hurricane Dorian caused untold destruction with winds over 200 MPH, one one the worst storms ever experienced. The intense winds are believed to be fueled by ever warmer ocean temperatures resulting from our oceans soaking up the results of our Global Warming. It is past the time to remain timid in changing our fossil fueled infrastructure. Change will need to be forced on the many opponents that have a vested interet in resiting a change away from Fossil Energy. The world community has been lied to and misinformed by the Fossil Industry for two long.

Question # 3
Black Carbon has the biggest impact of any transportation fuel on our climate. Untreated or poorly treated diesel fuel buses and heavy duty trucks on our highways continue to spew clouds of black soot on every highway I travel on. I see no enforcement on older or poorly maintained diesel trucks to limit this pollution with fines aor removal of vehicles. The state should set up a hotline for reporting violators by license plate and follow up with stricter enforcement.
Regarding diesel buses, New Jersey should lead with programs to convert and replace diesel buses by the thousands. Developing large scale bond programs to vonvert buses to electricity can be structured to amortize the cost of conversion for school and public buses so that the reduced maintenance and fuel costs keep electric bus costs no more than current all-in diesel costs. School buses are a particularly good target to pursue with pilot programs then large scale Wall Street Funding through leasing of converted buses. It is time to get away dirty diesel exhaust away from our school children. The funding solicited will need to include chageing at each school bus depot.

Question # 8.
The cost cap imposed by legislation is an artificial limit that came from horse trading among political forces and bears no relation the the benefits that widespread solar adoption will deliver. In addition to providing more resilience as battery storage grows, it already is reducing fossil emissions. Now that solar equipment costs have substantiall declined (witness large scale solar farms with storage bidding 25 year contracts less than 3 cents per kWh in LA. Many more 10 MW solar farms can be developed with storage at ever lower costs. Mandating storage with solar will also reduce the state's payments to PJM for capacity, and that avoided cost should be factored in. in addition, a solicitation should be held to allow the 500+ MW of existing solar farms to add storage to increase resilience and earn revenue by bidding capacity into the grid. Solar with storage should be preferred above any new fossil generation by charging for all the climate harming pollutants including methane emissions in any solicitation. The cost cap is artifically low because natural gas is artifically low. Energy

costs do not reflect the true cost of natural gas which must also include the harm CO2 and methane are causing by contributing to our Climate Crisis.

Question # 9
Out of State RECs do not help NJ move toward our goals of 100% clean energy and should not be procured and if necessary, defend that position legally. New Jersey needs the right to determine the type and location of where its energy is procured.

Question # 10 An establishment of a Green Bank combined with private industry funding would for renewables, storage and energy efficiency would accelerate our progress toward our clean energy. Rapid passage and implementation of PACE financing will start to unlock the EE and RE potential in the multi-tenant commercial sector.

Question # 11 Increasing the SBC charge now that energy prices are about 30% lower than they were at their peak would allow more innovative clean energy programs to be developed as well as programs that target underserved markets.

Question #12 The utilities are dragging their feet with developing and implementing programs to increase energy efficiency and reduce peak loads. Utilities remain focused on ensuring profits above all else and insist on full recovery of lost revenues through Revenue Decoupling. Utilities have worsened theenergy efficiency of NJ for years by avoiding aggressive energy efficiency programs solely to protect their revenue and grow profits. It is clear utilitis have failed to support aggressive energy efficiency goals which would have been New Jersey customers benefit.

Utility goals are definitely too low. A goal of 0.75% per year is laughably low for natural gas utilities. natural gas utilities need to embrace full electrification of homes and businesses and wind down their sales of methane as soon as possible. No additional investment in natural gas infrastructure should be allowed within the state. That means no new pipelines, generation or connections to end uses. Natural gas utilities must be ordered (or induced) to create new comfort and energy supply businesses powered by our increasing solar and wind renewable energy generation. New Jersey does not have time to waste to become much more aggrssive in reducing emissions given our global Climate Crisis.

Electric utility goals are too low and slow in ramp up. Incentives need to be created for over performance .

Question # 13
State run programs should be retained and the state should gradually modify its focus as utilities prove they can deliver aggressive results from the many areas of opportunity. Lighting, moors, controls, VFDs, thermal storage and other technologies should be the early focus with aggressive incentives to spur early customer response. In the early 1990s ConEd achieved rapid growth in lighting efficiency with its program of rebates of $1000 per KW of reduction in lighting. Incentives are generally to low to spur rapid growth in energy efficiency and higher rebates will spur investment in the provate sector to grow overall growth in the energy efficiency sector. An additional program paying per MWH for energy savings and MW of permanent reduction in demand should be piloted and later grown and be open to all suppliers that can verify results using metering.

Question #14 Opening programs that serve difficult to reach customers with higher incentives

can unleash entrepreneural efforts to reach these customers. measurement and Verification needs to be more flexible to reach these customers. See ConEd's efforts and results in their Brooklyn-Queens efforts to reduce demand.

Question # 15 See ConEd and Massachussetts aggressive programs. Although tightrning codes will help in the long term, innovate and lucrative efficiency opportunities are what get results from the private sector. Blocks of Capacity and energy reductions could be made available to the private sector in increments of 5 or 10 MWs at stated prices with rapid payment as results are achieved. M & V can verify results with advanced real time meters.

Question # 16 In the residential sector Incentives funded by an increased SBC should be used to encourage net-zero homes. These short term net-zero RECs should be over five years and be assignable to the builder so they invest in all the measures to spur adoption. The customer gets lower energy bills and a lower carbon footprint while the builder earns enough to pay for the necessary measures over five years. Similar programs can be developed for commercial buildings. All programs should prohibit connectionss for natural gas. A carbon fee program should be legislated to fund any new carbon reduction/avoidance programs. Goals and program ramp up shuold reflect New Jersey's 2050 goals.

Question #18 Rapid implementation of PACE financing can be one of the strongest tools to spur action in the commercial sector for renewables, efficiency, and energy storage (electric and thermal). The lower rates for financing with PACE than traditional financing will lower the cost to New Jersey. The state should also enact PACE financing for residential energy improvements by establishing a first loss fund as California did to address issues with SallieMae and Fanniemae. CA has spurred private investment in renewables, efficiency and storage of over $4.0 billion in just a few years. Enlisting local munipals in providing some reduction in real estate taxes for up to five years would help pay for these improvements.

Question # 19 new jersey should organize a task force to develop new Jersey Poilicy that mandates the rigerous application of Non-Wires and Non_pipes altrnatives for all proposed electric and natural gas infrastructure investments. Experts from energy efficiency, thermal storage, and other energy efficiency and demand reduction/avoidance should be the leads in developing policy proposals. Utilities continue to advocate for revenue earning infrastructure investments and have yet to embrace Non_wires and Non-pipes alternatives. This task force should be funded sufficiently to develop strong programs because the savings in crafting lower cost alternatives will greatly benefit New Jersey. FERc and PJM decisions continue to be little more than a rubber stamp for the energy industry so far. It is time to reinvent how the New Jersey energy industry evolves from today forward.

The going forward energy infrastructure plan should shape the grid to be smart, interactive, performance based and lead the state to a clean energy future with participation by all sectors.

Question # 21 The comprehesive development of non-wires and non-pipes alternatives including storage, renewables and net zero construction has the potential to eliminate virtually all new utility proposed traditional infrastructure expansion. All we need is the autorization to used the most creative solutions and access to real usage and demand information. Access to that information is either something utilities don't have or are unwilling to provide access to to preserve their ability to invest in new infrastructure opportunities.

Question # 22. Energy consumption data is owned by the customer and should be available in realtime to the customer and anyone that the customr authorizes. The smart meters are specified by their utility customers to limit customer access becaue doing so can enable it being used by customers to minimize energy and demand fees. all metering should be accessable to customers in real time.

Question # 26. All renewable energy sectors will continue to see growth and as renewable costs decline further the state should pan to overbuild renewables beyinf our usual peak demands. An excess production, after demand is minimized with electric and thermal storage, can used used to generate hydrogenby splitting H2O to be used for liauid based transportation or peaking needs. The hydrogen economy and its integration into our renewable energy future has yet to be invented.Long distance aircradt will likely be fueled with Hydrogen within the next thirty years to address our Climate Crisis

These limited comments were prepared by Dennis Wilson, an energy entrepreneur for forty years
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He has participated in numerous energy regulatory forums sinnce 1990 on energy efficiencyand renewables
Since he entered the energy efficiency and renewable sectors, his customers have reduced their costs for energy by in excess of $400,000,000
Although Dennis has been a board member of MSSIA for ten years, these comments are his personal opinions

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