



BICEP Network Members:

Adobe
Annie's Inc.
Aspen Skiing Company
Autodesk, Inc.
Aveda
Ben & Jerry's
Burton Snowboards
CA Technologies
Clif Bar & Company
Dignity Health
eBay Inc.
Eileen Fisher
Etsy, Inc.
Fetzer Vineyards
Gap Inc.
General Mills, Inc.
**Hackensack Meridian
Health**
IKEA
JLL
KB Home
Kellogg Company
Levi Strauss & Co.
Lbrands
LinkedIn
L'Oreal USA
Mars Incorporated
Microsoft
Nature's Path Foods
Nestlé
New Belgium Brewing
Nike
The North Face
Outdoor Industry
Association
Owens Corning
Patagonia
Portland Trail Blazers
Salesforce
Seventh Generation
San Francisco
International Airport
Sierra Nevada Brewing Co.
Squaw Valley
Starbucks
Stonyfield Farm
Symantec Corporation
Timberland
Unilever
VF Corporation
Vail Resorts
Vulcan, Inc.
Worthen Industries

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

October 12, 2018

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

Dear Members of the EMP Committee:

As the representative of a network of 51 major employers across the United States, I am writing to you on behalf of the Ceres BICEP (Business for Innovative Climate and Energy Policy) Network. The Ceres BICEP Network is made up of many businesses and institutions with operations and employees in New Jersey. Our coalition is committed to reducing greenhouse gas emissions and advancing our clean energy future through policy advocacy at the state and federal levels. We thank you for your leadership in launching the rewrite of the Energy Master Plan (EMP) with a commitment to put New Jersey on a course to reach 100% clean energy by 2050. 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, 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 implementing a strong community solar program, expanding net metering (including virtual / group net metering), and expanding Requests for Proposals (RFPs) and the target for offshore wind resources. We were pleased to see the passage of an increase to the RPS this 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, our members are making major investments in energy efficiency because it helps them cut energy waste, save money, and quickly gain a return on their 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 utility energy efficiency programs are well aligned and complementary to existing Office of Clean Energy Programs, and that well-designed 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.

*Companies listed in bold
have operations in NJ*

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. 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.

We are pleased that New Jersey has adopted California's Zero Emission Vehicles (ZEV) standard. We are also encouraged to see the legislature consider bold legislation to accelerate EV adoption in New Jersey. The proposals in the bill, including a statewide EV target, an EV rebate program, and a statewide public charging infrastructure network would all serve to accelerate New Jersey's transition to a clean transportation future. We also continue to encourage New Jersey to join the group of seven states and D.C. that recently held joint listening sessions through the Transportation Climate Initiative (TCI) in pursuit of a regional policy to reduce emissions from the transportation sector and to lead in the creation of a regional market-based approach to reduce transportation emissions.

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 announcement that New Jersey will rejoin the Regional Greenhouse Gas Initiative (RGGI). We encourage the state to align its emissions cap with other participating states, which can be done by embracing a cap of 12-13 million tons of CO₂ by 2020, as outlined in a recent report by NRDC.¹ A stringent state cap will ensure that New Jersey does not undermine the overall emissions reduction goals of the program. We also encourage the state to invest the future proceeds of RGGI in energy efficiency and renewable energy programs, creating a positive feedback loop to further reduce emissions from the power sector and achieve the state's ambitious clean energy goals.

States have a crucial role to play in ensuring that the nation continues to meet its obligations under the Paris Agreement. Under Governor Murphy's leadership, New Jersey should also consider joining the *We Are Still In* movement, where over 3,000 states, cities, businesses, institutions, and other stakeholders have committed to ensuring that the United States continues to lead.

Thank you for your work to rewrite and improve the EMP. As this process continues, we also encourage you to also consider the creation of a statewide climate action plan, which would compel state agencies to internalize climate change resilience and emissions reduction priorities into their policies and programs.

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,



Anne Kelly
Senior Policy Program Director, Ceres
On behalf of Ceres BICEP Network

¹ <https://www.dropbox.com/s/zd12o2qjl3fjwfk/Joint%20Comments%20on%20NJ%20and%20RGGI.pdf?dl=0>