
Via electronic submission to emp.comments@bpu.nj.gov

October 12, 2018
TO: Aida Camacho, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314, CN 350,
Trenton, New Jersey 08625

FROM: Norah Langweiler, Jersey Renews Campaign Organizer

**ABOUT JERSEY RENEWS**
Jersey Renews is a coalition of 60 organizations committed to state-based action on climate change that was launched in January, 2017 in recognition of the urgency of our climate crisis. We are a broad coalition of more than 60 organizations that includes labor, faith, environment, community, business and health organizations advocating for increased investment in clean energy infrastructure, reduced greenhouse gas emissions, and good, family-sustaining jobs.

We appreciate the opportunity to comment on the Energy Master Plan (EMP) as this is a critical document that will guide New Jersey as we work toward state-based policy solutions to address climate change. This opportunity is timely as last week, October 8, 2018, the Intergovernmental Panel on Climate Change released a special report on the impacts of global warming of 1.5 °C above pre-industrial levels.

**CLEAN AND RENEWABLE POWER**
First and foremost, the EMP must acknowledge the impacts of climate change, the potential for clean energy technologies like offshore wind, solar and energy efficiency, and the importance of reducing greenhouse gases to revitalize New Jersey's clean energy economy.

- **Support a comprehensive energy infrastructure investment program.** Rebuild and inmprove resiliency of public water, sewer, energy, transportation and school systems utilizing a project procurement process that prioritizes state, regional, or national sourcing of materials, and prioritizes full life-cycle analysis of the carbon content of those materials to reduce emissions.

- **The EMP must ensure that the Class I Renewables definition is not altered.** Class I renewable energy is defined as energy generated from solar, wind, tidal, geothermal, and sustainable biomass. While there is expected to be growth in alternative clean technologies like wave and geothermal, the most aggressive growth will be in solar and off-shore wind.

- **Class I Renewables should be ramped up expeditiously** to ensure a transition to a clean energy future. Clean renewable energy production should replace the state's four nuclear plants as they go off-line, at the end of 2019 for Oyster Creek, and no later than 2036, 2040, and 2046 as each of the remaining three nuclear plants' current operating licenses expire. Require aggressive decommissioning immediately upon closure, with ample labor engagement and joint planning throughout to minimize short-term job loss and reduce risks to public health and safety.

- **Reduce methane, a potent GHG.** Inspect and repair 6,000 miles of aging gas distribution pipes in NJ and 1,500 miles of gas interstate transmission lines, target and reduce leaks, improving energy efficiency, safety, and putting people to work.

- **Increase funding and end all Clean Energy Fund, and other dedicated fund, budget raids.** Commit to spending a significant portion of the funds in a socially just and labor-friendly manner.

- **Modernize the electric grid.** Increase the efficiency and responsiveness of the electric system and enable better integration of renewables by managing energy in new ways, creating a smart grid utilizing sensors and digital communication.

- **Ensure existing resources and new revenue streams** for energy, transportation, and air pollution reduction programs are intentionally targeted and allocated towards vulnerable, impacted, historically disadvantaged, and frontline communities.

**GREEN JOBS**

Innovation in the clean energy economy presents tremendous opportunity for the global environment and for workers in manufacturing, construction, and the service sector. But creating clean energy manufacturing jobs, in particular, will not be easy. While we have a chance to set the standard for high-quality, family-supporting jobs in New Jersey, there is much work to be done. To make New Jersey a true leader in the clean energy economy, the EMP should:

- **Invest in research and development.** It is critical to invest in clean energy technologies like solar, wind, and biomass. If properly managed, the development and implementation of these technologies will create hundreds of thousands of jobs in manufacturing, construction, installation, and maintenance. The development of effective large-scale and long-term batteries and energy storage, along with microgrids and distributed generation are also essential for ensuring a reliable and sustainable power grid. Large-scale public and private investment are critical for New Jersey to become a leader in this sector.

- **Promote Industrial Energy Efficiency Technologies.** Access to affordable and reliable energy is critical to the future of manufacturing. Nationally, the industrial sectors consume one-third of the nation's electric power and over the last several years, manufacturers have made strides to increase industrial energy efficiency through developing and implementing technologies such as combined heat and power (CHP) and waste heat to power (WHP). Increased utilization of these technologies could lead to an industry-wide 15 –32 percent reduction in energy consumption by 2025 and would help ensure that these manufacturers are globally competitive.

- **Protect Against Leakage.** Leakage is the phenomenon whereby production of goods, along with their associated jobs and carbon pollution, moves to a different state or country seeking weaker environmental or labor laws. New Jersey carbon reduction policies should address and combat leakage to ensure level playing field between in-state and out-of-state companies and to prevent jobs from leaving. Such policies are essential to the growth and maintenance of homegrown manufacturing jobs.

- **Ensure Compliance Flexibility.** Carbon reduction for energy intensive industries should provide regulated parties with the ability to comply with requirements through various means throughout the production cycle of finished goods. Regulated parties should be credited for using the most energy efficient technologies available. New Jersey should consider a phased in approach for regulated sectors.

- **Ensure Domestic Sourcing.** Domestic manufacturing has long served as a vital path to the middle class and the backbone for many communities across the country. As both private and public projects are developed, each should include a preference for sourcing materials from within New Jersey, the region or the United States. This creates jobs and reduces leakage. For example, China has much less stringent environmental standards and ineffective enforcement that has led to the Chinese steel industry emitting significantly more pollution per ton of steel than the U.S. steel industry.

  NJ should join the federal government and 21 states with laws requiring that domestic goods and materials get preference when bidding for government projects funded by taxpayer dollars. This will reduce the initial carbon footprint of any project and guarantee that U.S. manufacturing workers will play a role in clean energy infrastructure.

- **Ensure Health and Safety.** Clean energy policies should be accompanied by workers' rights policies, including those strengthening the right to unionize. The economic benefit of a developing clean energy infrastructure will be maximized by ensuring that the jobs created and maintained in NJ communities are good, union jobs that ensure family sustaining wages, benefits, and safe workplaces. A "just transition" must be guaranteed to minimize harmful economic impacts on workers and communities affected by environmental policies.

New Jersey needs to protect the vulnerable by creating a worker and community-planned "Just Transition" fund to provide short-term local tax revenue replacement and appropriate economic

development support for communities impacted by the energy transition; ensure the provision of strong social safety net benefits, including fully-funded retirements plans, free re-training and workforce development opportunities, and job placement for displaced workers and residents in impacted industries.

**OFFSHORE WIND**

The Energy Master Plan should set the goal for offshore wind power of 3,500 megawatts of clean energy by 2030. The projects should be implemented in phases so that the local workforce can be trained and NJ labor will benefit. The EMP should also establish an offshore wind program, including an offshore wind renewable energy credit program, through the NJ Board of Public Utilities, which will give certainty to offshore wind developers as they need to secure financing for turbines.

- **Require BPU to evaluate the state's full potential for offshore wind**, including capacity, preliminary siting scenarios and economic analysis for offshore wind that includes the social cost for carbon, as well as a comprehensive ocean planning process to inform decisions on siting and size.

- **EMP should prioritize the creation of a regional hub for turbine manufacturing** that could serve as a state and regional hub for domestic component manufacturing, assembly and delivery to the region via ship at a deep-water port.

We also want to echo comments made by the Offshore Wind Network to call for an explanation of the relationship between the EMP and the Offshore Wind Strategic Plan; protect ratepayers from any sudden shocks of price increases for electric service; return to the spirit of the 2008 EMP, which called for 3000MW of offshore wind by 2020, and focus on the economic opportunities and other benefits of a clean energy program; focus on innovation and smart investments in energy infrastructure, and explain the role of state utilities and their interconnections with offshore wind energy in bringing New Jersey into the clean energy revolution; and completely rewrite the 2011 EMP and 2015 EMP Update section on offshore wind energy (pages 29-31 in EMP 2015 Update) to reflect the state's recommitment to offshore wind energy.

**SOLAR**

We echo Vote Solar's assessment of solar energy as cheap, scalable, and plentiful. It is easily available and accessible by everyone. Solar provides siting flexibility - solar arrays can be small or large-scale, depending on the needs. More importantly, solar is already at a price point that can scale and we are seeing numerous examples of solar competing with other energy sources without subsidies. With the right policies in place, solar will continue to become cheaper and more affordable. Solar also embodies energy democracy and empowers local communities and individuals to make their own energy decisions.

As part of the EMP, the BPU immediately needs to move forward on a revamped solar program that transitions New Jersey off SRECs and moves the state towards a more stable solar market system that prominently features utility-scale and community solar. New Jersey should look to

the experiences of Massachusetts and New York to develop sustainable models for solar adoption

The EMP should also:

- **Promote Utility-Scale Solar.** Utility-scale solar projects are important to the rapid growth of renewable energy in the state and provide good, family-sustaining union jobs. The BPU should work with solar industry representatives, utilities and environmental leaders to develop a plan to accelerate utility-scale solar development while addressing potential issues with SRECs, including cost, and strengthening other sectors of the solar industry.

- **Install 500MW of Community Solar by 2020.** Community solar, where neighbors, companies, and/or towns install and share commonly owned and paid-for arrays on otherwise unusable land, like parking lots or buildings, represents a vital part of New Jersey's future solar growth strategy. Residents who are unable to install their own solar panels, like renters or apartment-dwellers, can participate in community solar. Installing 500 megawatts of solar by 2020 would jump-start this vital part of New Jersey's solar market. At least 15 percent of community solar projects should be created in low to moderate-income communities.

**TRANSPORTATION**

Every traveled mile by car converted to electric is 70% cleaner than a gas-powered mile. Increasing the number of electric vehicles on the road is a crucial step to meeting the state emissions reduction goals. Electric vehicles (EVs) have come a long way since their inception. Increased range and more affordable pricing, along with proposed policies for charging infrastructure, make electric vehicles a practical choice for New Jersey's commuters.

The EMP should:

- **Formally endorse the Zero Emissions Vehicle program**, ensuring at least 330,000 plug-in vehicles registered in New Jersey by 2025, and set goals of 2 million EVs by 2035, and 90% of new car sales are zero emission by 2040.

- **Electrify public fleets of cars, buses, trains, and trucks** in use by various state departments. Accelerate electric bus adoption by NJ Transit with a clear timeline and benchmarks to reach 100% electrification of transit buses by 2035. Encourage and provide incentives for municipalities to convert their fleets to electric vehicles as quickly as possible.

- Invest and implement an aggressive electric vehicle charging infrastructure program.

- **Reinstate the Port Authority of NY and NJ's pre-2007 engine truck ban** at the port, initially approved by PANYNJ in 2009, and transition the drayage fleet to 2010 and newer engines. The structure of the ban should be redesigned to ensure that the drivers are not paying for the new trucks. Support and sign into law policies that create "clean truck exemption" program, which would fund port-related environmental mitigation and specifically incentivize the turnover of the drayage truck fleet. Clean trucks meeting the

standard for entry (trucks with post-2007 engines) would be exempt from the fee and truck companies with older, dirtier trucks would pay a fee into a fund used to subsidize fleet modernization.

- **Join the Transportation & Climate Initiative EV program**, designed by five leading states in the region. New Jersey will publicly commit to measurable goals and inter-agency coordination between states.

- **Prioritize transportation investments** to improve public transit, repair critical infrastructure, and develop walkable and bike-able communities where jobs, housing, and amenities are within easy reach of each other, while maintaining transparency, accountability, and equity.

- **Continue to implement CAFE standards** and explore additional approaches to insure New Jersey reaches its clean air and greenhouse gas emissions goals.
- **Commit to measurable reductions in particulate matter,** nitrogen oxide, and sulfur oxides in vulnerable communities to help reach compliance with 2016 EPA air quality standards. Since transportation accounts for nearly 50% of GHGs in New Jersey, measuring air pollution through local monitoring is a concrete marker for success.

We would like to echo comments made by ChargeEVC to call for the EMP to: set goals and clarify authorizations; eliminate range anxiety with the development of the Essential Charging Public Network; address the affordability gap through a rebate program for electric vehicles; ensure widespread "Right to Charge" policies that provide routine charging where needed, responsible grid integration, optimization of benefits through managed charging programs, ensuring that all buildings are EV ready, and support of kilowatt-hour pricing; ensure electrification reaches all communities equally (transit and fleets); build awareness through outreach and education.

**ENERGY EFFICENCY**
Using less energy in buildings saves money and helps the environment, and is the cheapest way to achieve clean energy and better environmental health.

The EMP should:

- **Improve Energy Efficiency Savings.** Require a 30% reduction below 2015 levels for electric and natural gas usage in New Jersey by 2030 with clear, measurable interim benchmarks, including support for conservation programs.

- **Expand Energy Efficiency at Industrial Facilities.** New Jersey should support policies and measures that expand the use of industrial energy efficiency technologies, that will serve to reduce greenhouse gas emissions, maximize efficiency, reduce waste and help industrial facilities be more competitive nationally and globally.

- **Improve Green Building Standards for New & Existing Construction.** High performance green building standards in new and existing state construction ensure that the state leads by example. Examine and update building envelope and efficiency codes

and requirements. Provide funding to qualified labor-management training providers to train employees in operations and maintenance to optimize building performance. Implement green cleaning and renewable energy measures in public and commercial buildings, particularly schools. Offer free benchmarking for hospitals, municipalities, public schools, universities, multifamily units, retail, and other sectors allows for greater insight into the benefit of energy efficiency.

- **Convene an Energy Efficiency Task Force.** The state must convene a task force of building industry professionals and stakeholders to chart a comprehensive and long-term path to reducing pollution in the building sector. The task force should consider best practices in building use, operations, and design, ways to increase energy audits and energy use transparency, changes to the state's uniform building code that can improve efficiency in new buildings, recycled materials, location siting, waste management, and a full set of policy options to drive retrofits in existing buildings.

- **Establish Energy Data Transparency.** Access to energy data is the foundation for any real building efficiency progress; residents and building owners need simple access to understandable, reliable information. The NJBPU should give building owners and managers electronic access to monthly, whole-building, aggregated energy consumption data with reasonable confidentiality protections for tenants. Being able to measure and verify energy reduction is critical.

- **Invest in Building Departments.** Invest in the building performance departments of the future. Local building departments must be given the tools and resources they need to implement New Jersey's building energy standards. Current policy rewards the exceeding of mandatory code, but does not address the larger problems of overall compliance and older buildings that lag far behind current standards. To achieve state goals for efficiency and energy independence, the state must prioritize strong compliance for all buildings with the state's energy code and consider incentivizing up-to code improvements for buildings designed and built to lower standards.

- **Retrofit Buildings to Increase Efficiency and Safety.** Consider green design techniques and standards, including consideration for passive houses, heat pumps, recycled materials, and location siting; examine and update building envelope and efficiency codes and requirements; train employees for operations and maintenance to optimize building performance; implement green cleaning and renewable energy measures in public buildings, particularly schools.

**Commit to a statewide weatherization, healthy homes, and energy efficiency workforce development program.** Provide funding for union apprenticeship programs, training centers ,and companies for hiring training graduates; recreate a needs-based rebate program to offset consumer costs and stimulate market demand.

Comments co-signed by the Jersey Renews partners listed below:

1. Action Together New Jersey
2. AFT AAUP
3. AFT NJ
4. AFT URA
5. ANJEC
6. ATU
7. Banking on NJ
8. BlueWaveNJ
9. CATA
10. Central Jersey Coalition Against Endless War
11. Citizen Action NJ
12. Clean Water Action
13. Communities United
14. Cooper's Ferry Partnership
15. Communication Workers of America
16. CWA1032
17. CWA 1036
18. CWA 1037
19. CWA 1081
20. CWA 1085
21. Delaware Riverkeeper
22. League of Conversation Voters
23. Environment New Jersey
24. Green Muslims of New Jersey
25. GreenFaith
26. Health Professionals and Allied Employees
27. Industrial Union Council
28. Islamic Society of Central Jersey
29. Isles, Inc.
30. La Casa de don Pedro
31. Latino Action Network
32. LEAM NJ
33. Make the Road New Jersey
34. Mom's Clean Air Force
35. New Labor
36. NJ Black Issues Convention
37. NJ Council of Churches
38. NJ League of Women Voters
39. NJ PIRG
40. NJ Policy Perspective
41. NJ Education Association
42. Princeton Student Climate Initiative
43. Reform Jewish Voice of New Jersey
44. SEIU 1199
45. SEIU 32BJ
46. SEIU New Jersey State Council
47. Shore Nurses Union/NYSNA
48. Sierra Club
49. Tri-State Coalition for Responsible Investment
50. Tri-State Transportation Campaign
51. UFCW Local 152
52. United Steelworkers
53. New Jersey Work Environment Council
54. Wind of the Spirit
55. Working Families Alliance of New Jersey
56. Business Network for Offshore Wind
57. Main Street Alliance
58. New Jersey Sustainable Business Council

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