



Sustainability is the bottom line.

BICEP Network Members: *

Adobe Systems Inc.
Akamai Technologies
Annie's Inc.
Autodesk
Aveda
Ball Corporation
Ben & Jerry's
Biogen
Burton Snowboards
Burt's Bees
Clif Bar & Company
CommonSpirit
Danone North America
DSM
eBay Inc.
Eileen Fisher
Etsy
Fetzer Vineyards
Gap Inc.
General Mills, Inc.
Hackensack Meridian
Health
Happy Family Brands
IKEA Retail U.S.
Impossible Foods
Indigo Ag
JLL
Kaiser Permanente
KB Home
The Kellogg Company
L'Oreal USA
LBrands
Levi Strauss & Co.
LinkedIn Corporation
Lyft
Mars Incorporated
Mass General Brigham
McDonald's Corporation
Microsoft Corporation
Nature's Path Foods
Nestlé USA
New Belgium Brewing
Nike, Inc.
Outdoor Industry Association
Owens Corning
Patagonia, Inc.
Portland Trail Blazers
REI
Salesforce.com, Inc.
Schneider Electric
Seventh Generation
SFO
Sierra Nevada Brewing
Squaw Valley
Starbucks Corporation
Stonyfield Farm
Symantec Corporation
The North Face
Timberland
Unilever
Vail Resorts
VF Corporation
Vulcan, Inc.
Workday
Worthen Industries

11/10/2020

Secretary Aida Camacho-Welch
Board of Public Utilities
44 South Clinton Ave., 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

RE: Ceres BICEP Network Comments on Utility Energy Efficiency and Peak Demand Program Filings – Docket Nos. EO20090620 (Jersey Central Power & Light); EO20090621 (Atlantic City Electric); EO20090623 (Rockland Electric); GO20090618 (South Jersey Gas); GO20090619 (Elizabethtown Gas); and GO20090622 (New Jersey Natural Gas)

Dear Secretary Camacho-Welch:

I am writing on behalf of the Ceres BICEP (Business for Innovative Climate and Energy Policy) Network, a coalition of 68 major employers and large electricity customers across the United States, including many with operations, facilities, and business interests in New Jersey.

We would first like to thank the Board of Public Utilities (BPU) for its leadership in issuing its final Energy Efficiency Order in June. This decision provides a strong foundation for meaningful progress on climate change and the achievement of the state's energy and climate goals established by the *Clean Energy Act of 2018*.

Climate change poses a significant risk to the long-term economic success of our members and the larger business community. It threatens the health and livelihood of the communities in which businesses operate and disrupts the value chains on which they rely. Because of these risks, companies in New Jersey and nationwide are making significant commitments to reduce their greenhouse gas (GHG) emissions.¹

However, businesses are often constrained in how much they can do to drive down their total GHG emissions footprint. For example, their direct ability to optimize the sources of energy that power the economy is limited. Therefore, they have a significant interest in finding ways to systematically

¹ Nearly half of all Fortune 500 companies have set goals to reduce GHG emissions, procure renewable energy, and invest in energy efficiency, see: Ceres. "Power Forward 3.0: How the largest U.S. companies are capturing business value while addressing climate change" April 15, 2017. <https://www.ceres.org/resources/reports/power-forward-3>

improve the emissions performance of our electricity and gas systems, including through the support of policies and programs that eliminate energy waste or switch to clean energy sources.

In addition to helping the state mitigate the worst impacts of climate change and helping businesses manage energy costs, energy efficiency investments can help the state recover economically from the COVID-19 pandemic. Now, more than ever, New Jersey needs tested, proven investments that pay for themselves, create local jobs, help hard hit industries, protect vulnerable populations, improve air quality and public health, and position the state to recover as quickly as possible as the economy re-opens. New Jersey has a rare window of opportunity to accelerate its recovery by doubling down on its energy efficiency programs—all at a time when residents and businesses need it the most.

Given the imperative to take immediate action to combat climate change and address the public health crisis, bold state leadership is needed. Accordingly, we urge you to expeditiously approve the 2021-2024 electric and gas utility energy efficiency program plans and to ensure that approved programs are:

- (1) Positioned to achieve ambitious goals for saving energy and peak demand;
- (2) Designed to meet the needs of businesses and consumers;
- (3) Implemented without delay; and
- (4) Afforded robust, stable funding.

This approval would send a strong signal to the thousands of energy efficiency contractors and construction workers that New Jersey remains open for business. In 2019, energy efficiency investments helped create more than 33,000 jobs across the state.² These jobs pay well, are local, and are in hands-on fields like installation so they cannot be easily outsourced. Many of these positions are with small businesses that are struggling to survive in the face of economic uncertainty. With the recent rise in COVID-19 cases, there is potential that the efficiency sector could once again lay off employees. Approving the utility plans expeditiously and affording programs robust, stable funding will provide important assurances to the industry so that it retains its highly skilled workforce.

The BPU should also direct utilities to implement best practice health and safety requirements for COVID-19 and prioritize program approaches that:

- Fund shovel-ready projects;
- Take advantage of buildings that are vacant, under capacity, or are in dire need of improved ventilation and HVAC in order to curb the spread of COVID-19;
- Support critical infrastructure like hospitals and healthcare facilities; and
- Serve customer segments that are acutely harmed by COVID-19's impacts, including residential and low-income customers, small businesses, and the education, hospitality, food services, and tourism sectors - among other industries.

Finally, we urge the BPU to support the achievement of the state's climate goals by approving building electrification measures and programs for new and existing

² "Clean Jobs New Jersey 2019," E2, May 23, 2019, <https://e2.org/reports/clean-jobs-new-jersey-2019/>.

residential and commercial buildings. The built sector accounts for 40% of U.S. energy consumption and 12% of GHG emissions.³ Emissions from buildings are upwards of 26% of total GHG emissions in New Jersey.⁴ As building stock continues to increase, this growing source of emissions must be addressed. Notably, the technologies needed to drive down these emissions are commercially available, but ambitious initiatives are required to accelerate their deployment.

We applaud New Jersey Natural Gas and Rockland Electric for including beneficial electrification programs in their filings and recommend that all utilities develop and deploy building electrification pilot programs as a part of this program review and approval cycle. Pilot electrification offerings would support the collection of critical data so that utilities, the BPU, and stakeholders can better understand the opportunity to offer and expand building electrification measures to save ratepayers money and curb GHG emissions.

In closing, effective energy efficiency programs will benefit New Jersey's economy, its communities, and the health of its citizens and businesses. At this time of economic upheaval and climatic uncertainty, the timely approval of comprehensive, fully funded energy efficiency programs would send a clear signal to businesses and the people of New Jersey that the state is serious about addressing our dual public health and climate crises.

We appreciate the opportunity to provide these comments and share the perspectives of the private sector. Please do not hesitate to be in touch if we can provide additional information.

Sincerely,



Anne L. Kelly
Vice President of Government Relations, Ceres
On behalf of Business for Innovative Climate and Energy Policy (BICEP)
Senior Director, Ceres BICEP Network

*Ceres BICEP Network members listed in bold above have direct operations in New Jersey. For more information on the Ceres BICEP Network visit: www.ceres.org/BICEP.
For more information, please contact John Carlson at jcarlson@ceres.org

³ "Energy Efficiency Trends in Residential and Commercial Buildings," U.S. Department of Energy, October 2008, https://www1.eere.energy.gov/buildings/publications/pdfs/corporate/bt_stateindustry.pdf, and U.S. Environmental Protection Agency website on "Sources of Greenhouse Gas Emissions," <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions>.

⁴ "New Jersey's Global Warming Response Act 80 x 50 Report: Evaluating Our Progress and Identifying Pathways to Reduce Emissions 80% by 2050," New Jersey Department of Environmental Protection, October 15, 2020, <https://www.nj.gov/dep/climatechange/docs/nj-gwra-80x50-report-2020.pdf>.