



**Engineers Labor-Employer Cooperative**  
The Labor-Management Fund of Operating Engineers Local 825  
65 Springfield Avenue, 2<sup>nd</sup> Floor, Springfield, NJ 07081

**March 5, 2021**

Aida Camacho-Welch  
Secretary of the Board  
NJ Board of Public Utilities  
44 South Clinton Ave, 3<sup>rd</sup> Floor  
Trenton, New Jersey 08625-0350

**Subject: Docket No. EO20030203 - Resource Adequacy Alternatives**

The Engineers Labor-Employer Cooperative is a labor-management trust that represents the combined interests of the nearly 8,000 members of International Union of Operating Engineers Local 825, and the signatory union contractors who employ them. As a multi-state organization, ELEC focuses on promoting economic development and advocating for investments in infrastructure -- not only to provide work opportunities but to ensure that our members, contractors and their families, have the quality of life they deserve as residents of New Jersey.

IUOE and contractors invest millions annually, host and operate two state-of-the-art training campuses and are making significant advancements and investments in STEM higher education for our members to keep up with equipment technology, software and hardware, internal computers, GPS and other advanced features, which will be required to build the energy of the future. As we plan the energy mix of the future, it is critical to keep in mind that organizations like ours have already begun putting the pieces in place to ensure our membership is up-to-date and ready to work.

The Integrated Clean Capacity Market's main focus is creating a new market place based on demand for zero-carbon generation by utilizing and promoting renewable energy such as wind and solar, and would do so at the "lowest possible cost". However, the ICCM also allow states with pre-existing renewable energy contracts in place to exempt those contracts from the ICCM market. With New Jersey currently contracting for 7500MW off offshore wind, and with the cost of these contracts still unknown, we cannot capture the true cost the ICCM would have to rate payers in this State. In addition, the method of exempting previous energy contracts hides the true cost of transitioning New Jersey to 100% renewable energy.

It is imperative that we maintain a diverse energy portfolio that is reliable and resilient. New Jersey has lessons to learn from Texas. Solely relying on renewables as our State's energy source is unreliable and dangerous to the health and welfare of our residents. We must include nuclear

and natural gas in our energy portfolio as these sources will provide dependability when renewables fail to provide enough energy output needed for our energy grid.

### **Conclusion**

In determining New Jersey's energy future, it is imperative that reliability and resiliency in our energy grid remains the top priority when implementing changes to how New Jersey purchases and supplies energy to residents and businesses of our State. Remaining within the PJM marketplace will provide New Jersey with clean and efficient energy sources while maintaining a resilient and reliable energy grid that will prevent New Jersey from interruptions that can have catastrophic outcomes on our State's economy.

Thank you for the opportunity to submit these comments.