



**DOCKET NO. GO20010033**

February 8, 2022

**RE: NATURAL GAS COMMODITY AND DELIVERY CAPACITIES IN THE STATE OF NEW JERSEY**

Thank you for the opportunity to comment on the recent London Economic International study “*Analysis of Natural Gas Capacity to Service New Jersey Firm Customers*”. As advocates for cleaner, affordable energy, we share state policymakers’ goals of reducing greenhouse gas emissions and addressing climate change. It is important that in pursuit of these goals we do not simply allow good intentions and symbolic wins to distract us from actual and meaningful progress.

As heavy machine operators, we can comfortably say that those in the building and constructions trades are bracing for a significant decrease in work projects and man-hours in this push for “green jobs.” We raise this as the idea of “green jobs” has been tossed around liberally but has never been defined – specifically in the construction’s trades. All data that has analyzed this topic shows there is not an apples-to-apples comparison with traditional fuel projects and those being proposed. The economics are simple – New Jersey resident will pay more and get less.

The backbone of the New Jersey economy is natural gas – natural gas that is moved by pipeline. Whether it is our advanced research industry, or supply chain designation in the corridor or the ports we are home to, they are all built on a natural gas backbone. If we plan to keep these industries, the demand for gas will remain or increase – period.

The London Economic International report that is going to be used to drive changes going forward is based on a ‘house-of-cards’ calculation that gas demand will decrease by mandating the electrification of residents and business. This comment is made with the knowledge that at present 75% of all NJ homes are heat using natural gas and 90% of our electricity is generated by natural gas and nuclear. Plain and simple, non-gas and non-pipeline alternatives will not meet the state’s present needs for energy and heat – let alone the exponential increase that would come with electrical mandates, notwithstanding the cost.

The Engineers Labor-Employer Cooperative is a labor-management trust that represents the combined interests of more than 8,000 members of International Union of Operating Engineers Local 825, and the 1,000 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. These are just some of the reasons, why investments in natural gas infrastructure are critically important to quality of life as well as economic development and why proposals that claim electrical mandates will result in any net-benefits is completely counter intuitive to all available data.