board.secretary@bpu.nj.gov

Re: Comments re Docket No. QO22050327, Proposed Updates to New Jersey's Clean Energy Program: New Construction Program

My name is Patricia S. Miller.

As a co-leader of the NJ 50 x 30 Building Electrification (BE) Team, I (and the whole team) wholeheartedly endorse your effort to streamline NJ Clean Energy's New Construction Program administration and advance building electrification. Our team's goal is to maximize decarbonization in the building sector by electrifying everything possible in both new and existing residential and commercial buildings as soon as possible. Our highest priority is on installing electric heat pumps for space and water heating in all buildings.

We advocate for all new construction to be Zero Energy Building (ZEB) rather than only Zero Energy Ready, and that there be strong incentives to install electric heat pump space and water heat. In NJ, the most efficient heat pumps for space heating are air source cold climate heat pumps or, in the coldest regions of NJ, ground source heat pumps, both of which are up to 3 TIMES more efficient than gas or any other fossil fuel. The buildings should be incentivized to optimize efficiency measures and provide an electrical system capable of handling all future electrical needs. For a building to qualify as ZEB, the definition of what clean energy source qualifies to offset any carbon-emitting fossil fuel energy used in the building needs to be expanded from only "on-site" generation (such as rooftop solar with battery). If on-site clean energy is infeasible, then allow any sharable clean energy source, including community solar, long-term contracts for RECs, Power Purchase Agreements for renewable energy, or the renewable content of electricity delivered by the local utility.

Incentives offered by the NJBPU need to be proportional to the amount of carbon emissions saved. So, heat pump space and water heating are highest value, as is on-site clean energy generation. Likewise, energy efficiency measures deserve high-value incentives, proportional to their emissions savings. EV charging is also high value. Energy star electric appliances would merit moderate incentives, as their emissions savings is more modest. There is no benefit to be gained in giving ANY incentive for gas furnace or appliances, since builders will always provide space and water heating, and the default gas, no matter how efficient, adds to the emissions load, rather than reducing it.

Incentives for affordable housing or buildings in EJ or low-income communities should be much higher than ordinary incentives, perhaps as much as 100% of the marginal cost for the high-value electric options. This will prevent these communities from bearing the cost of rate increases for gas as others transition away from it. It is also incumbent upon the state to prioritize transitioning away from fossil fuel the people who have most suffered most the detrimental health impacts of living in the highly polluted areas (indoors and outdoors) these fossil fuels have caused.

Granted, this NJ Clean Energy program deals only with new construction. However, our NJ 50 x 30 BE Team is advocating for these same measures to apply to existing building rehabs and retrofits also. We believe that a universal program across all utilities for electrifying existing buildings structured similarly to the one you are creating for new construction (and with the enhancements I have suggested) would be in the public interest.