

New Jersey Board of Public Utilities
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Submitted via email to board.secretary@bpu.nj.gov

Re: Board of Public Utilities True-Up Budget Proposal 2022 Comfort Partners Program
Docket No: QO21040720

October 21, 2022

We, the undersigned, thank the New Jersey Board of Public Utilities (the Board) for the opportunity to provide feedback on the Comfort Partners 2022 True-Up Revised Budget and Program. The Comfort Partners Program provides 100% cost coverage to energy and other efficiency measures on gas and electric systems for low to moderate income customers. We commend that program funds are used to realize important public health impacts, such as the large portion spent fixing active carbon monoxide and methane leaks inside of homes, protecting residents from deadly toxins while simultaneously reducing energy waste. We agree with the need for the program to continue providing energy efficiency measures that are relevant and needed by energy burdened customers; however, PSE&G's requested shift of \$2.4M from electric to gas measures is indicative of a system that has not historically incentivized electrification of homes, can perpetuate health inequities borne by low and moderate income residents, and does not keep us on track to meet the goals of the Energy Master Plan.

A lack of strategic planning has resulted in New Jersey's continued dependence on gas for home heating, with 75 percent of NJ households relying on gas as their primary heating fuel¹. Without proper investment, incentives, and government programming, electrification will not become as accessible to low and moderate income residents, leaving them more likely to have homes heated by gas, oil, and propane. Volatile fossil fuel prices will continue to impact our ratepayers, with gas rates increasing by as much as 25 percent this month². The time is now to start planning for the transition to a clean energy future and to protect our low and moderate income neighbors from bearing the brunt of future fossil fuel costs. **We urge the Board to plan strategically to better incentivize the Comfort Partners' electric measures in the future, as increasing funding for gas measures will keep customers dependent on fossil fuels.**

Home electrification comes with significant climate and health benefits. Gas, oil and propane systems come with the aforementioned risk of leaking carbon monoxide and methane, as well

¹ [New Jersey Profile \(eia.gov\)](https://www.eia.gov)

² [NJ natural gas bills soar after approved hikes for PSEG, NJNG \(northjersey.com\)](https://www.northjersey.com)

as nitrogen dioxide, particulate matter (PM_{2.5}) and volatile organic compounds (VOCs)³. Just this past weekend in Newark, New Jersey, eleven residents in a Newark Housing Authority were injured and rushed to hospitals due to a carbon monoxide leak⁴. This exemplifies that while it is critical for people to be able to heat their homes this winter, use their stovetops, and have access to hot water, fossil fuel-powered appliances have economic consequences and pose an ongoing threat to human health, in addition to the climate implications of burning fossil fuels.

We encourage the Board to explore opportunities to electrify homes that are currently outfitted with outdated or aging gas, oil or propane-powered appliances, as well as the immediate replacement of any appliance leaking methane or carbon monoxide with its electric counterpart under the Comfort Partners Program. Customers can reap significant savings through the combined measures of weatherization and electrification, reducing bills by more than 50% according to a 2022 Study by Acadia Center⁵. The majority of New Jerseyans also support policies that advance the adoption of electric appliances in buildings⁶.

We value the importance of this program to New Jerseyans and their ability to meet their energy needs, and we welcome the ability to help provide feedback on such a critical program. However, the revised budget and development of the Comfort Partners Program guidelines have not provided authentic opportunity for deeper-level engagement. Though the comment period provides the minimum of seven calendar days to comment, which complies with current procedures, it does not provide adequate time for meaningful public feedback. Thus far, the Board's annual Comprehensive Resource Analysis proceeding for its Clean Energy Program Budget and programs has proven insufficient to make pivotal changes to Comfort Partners Guidelines and other energy efficiency programs, such as strategic planning to better incentivize electrification while meeting customers' energy needs. **Therefore, we recommend providing a minimum of 10 business days (14 calendar days) for public comment, and that the Board establish a stakeholder process before the end of the year to discuss the redesign of the Comfort Partners program to align with New Jersey's clean energy goals.**

We appreciate the work of the Board staff towards the success of Comfort Partners and energy efficiency programming. Should you have any questions, please feel free to reach Ed Potosnak, Executive Director, New Jersey LCV, at ed.potosnak@njlcv.org.

³ Brady Seals and Andee Krasner, Health Effects from Gas Stove Pollution, Rocky Mountain Institute, Physicians for Social Responsibility, Mothers Out Front, and Sierra Club, 2020, <https://rmi.org/insight/gas-stoves-pollution-health>.

⁴ [11 hospitalized due to carbon monoxide leak at Newark apartment building - CBS New York \(cbsnews.com\)](https://www.cbsnews.com/news/11-hospitalized-carbon-monoxide-leak-newark/)

⁵ [The Future Is Electric - Acadia Center](https://www.acadia-center.org/2022/05/10/the-future-is-electric/)

⁶ [ReThink Energy NJ poll shows large majority of NJ voters support stronger action to address climate change \(prnewswire.com\)](https://www.prnewswire.com/news-releases/rethink-energy-nj-poll-shows-large-majority-of-nj-voters-support-stronger-action-to-address-climate-change-2022-0100000000.html)

Sincerely,

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