

Honorable Sherri L. Golden,
RMC Secretary of the Board New Jersey Board of Public Utilities
44 South Clinton Avenue, 1st Floor
P.O. Box 350 Trenton, NJ 08625-0350

Re: "IN THE MATTER OF THE IMPLEMENTATION OF EXECUTIVE ORDER 317 REQUIRING THE DEVELOPMENT OF NATURAL GAS UTILITY EMISSION REDUCTION PLANS" AND THE NEW JERSEY BOARD OF PUBLIC UTILITIES' NOTICE OF TECHNICAL CONFERENCE SOLICITATION OF PUBLIC COMMENT BPU DOCKET NO. GO23020099

Dear Secretary Golden,

The Natural Resources Defense Council is pleased to participate in this docket. NRDC is part of jointly filed comments by the Environmental Defense Fund.

This letter serves to identify and expand upon a citation used by New Jersey Natural Gas in its comments to this docket. On Page 17 of NJNG's filed comments, it cites a blog published by NRDC¹ to imply that the global warming potential of soon-to-be-phased out refrigerants is a potential reason be skeptical of heat pumps as a key technology to reduce GHG emissions from the building sector.

NRDC believes this is a mischaracterization of the publication and NRDC's position and needs to be corrected for the record.

The statement cited by the company on Page 17 of its comments reads:

According to the Natural Resources Defense Council, "most current electric heat pumps which use refrigerant R-410A with a global warming potential (GWP) of 4,260 over 20 years. This means that when a pound of refrigerant leaks into the atmosphere, it packs 4,260 times the climate wallop as a pound of CO2." (emphasis in the original).

The full passage of the publication reads as follows:

Most current heat pumps use refrigerant R-410A with a global warming potential (GWP) of 4,260 over 20 years. This means that when a pound of refrigerant leaks into the atmosphere, it packs 4,260 times the climate wallop as a pound of CO2. Alternative refrigerants have less than a quarter to less than one percent the climate impact of R410A and other high-GWP refrigerants. **That is why we're phasing them out.**

The publication continues:

But while HFCs are bad for the climate, the CO2 and methane emissions from using conventional electric and gas equipment are much worse. That's because GWP alone is not all that matters—the

¹ <https://www.nrdc.org/bio/pierre-delforge/dont-let-refrigerants-slow-heating-decarbonization>

quantity of gas that is emitted multiplied by its GWP determines the climate harm and producing and delivering electricity and gas causes far more tons of those pollutants to be released than HFCs. Researchers at UC Davis demonstrated this in a study that we summarized here: [The Climate Math of Home Heating Electrification](#). When accounting for all emissions from heating, including those from power plants that power heat pumps and furnace blowers, refrigerant leakage, CO2 and methane emissions from gas furnaces, today's **heat pumps cut emissions by 45 to 70 percent vs. gas furnaces**. And that study was done before the Inflation Reduction Act passed and does not include its effect on accelerating the decarbonization of the power grid.

Sincerely,

Eric Miller
NJ Energy Policy Director
Natural Resources Defense Council