



January 22, 2024

TO: New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314, CN 350
Trenton, New Jersey 08625

RE: Notice on the Establishment of Zero Emission Certificate Program for Eligible Nuclear Plants
Docket No. EO18080899

The New Jersey League of Conservation Voters, also known as New Jersey LCV, thanks the Board for the opportunity to comment on the Zero Emission Certificate Program (ZEC Program). New Jersey LCV is the statewide political voice for the environment advocating for clean air, clean water, and equitable access to open spaces for all New Jerseyans through strong and just environmental policy.

New Jersey LCV supports the continued safe operation of existing nuclear power plants, with careful consideration to equitable policies in waste disposal, in order to meet our clean energy goals and reduce climate-polluting emissions that contribute to climate change. The Garden State's greatest environmental threat is climate change, which is currently resulting in more frequent and severe storms, extreme heat in the summer and cold in the winter, and shifts in native fauna and flora, which results in impacts to agriculture, infrastructure, and human health. Existing nuclear power plants account for 40% of New Jersey's clean, renewable energy to the electric grid without emitting carbon or other harmful climate co-pollutants, making them an important part of a just clean energy transition.

Existing nuclear power plants have the opportunity to apply for significant amounts of federal funding through the Inflation Reduction Act to offset some of the hundreds of millions of New Jersey taxpayer dollars credited to these facilities. To encourage companies with existing facilities to apply for federal funding, we recommend the Board require companies to apply for federal funds when available in order to receive state zero emission credits. This could be confirmed through self-attestation with randomized confirmations or through any other existing verification processes to ensure compliance. New Jersey LCV believes these companies should receive credits based on need and what will offset New Jersey taxpayer dollars.

New Jersey LCV encourages the Board to continue supporting an equitable clean energy transition in the Garden State that protects our climate and human health and remains affordable to New Jerseyans. If you have any questions, please reach out to the Senior Director of Public Policy, Allison McLeod, at Allison.McLeod@njlcvt.org.