



In The Matter Of The Clean Energy Programs And Budget  
For Fiscal Year 2024  
True-Up, Revised Budgets and Program Changes  
Docket No. QO23040236

March 27, 2024

New Jersey Board of Public Utilities  
Attn: Secretary Carmen Diaz  
Acting Secretary of the Board  
44 South Clinton Ave., 1st Floor  
P.O. Box 350  
Trenton, NJ 08602

Thank you for the opportunity to submit public comments on the Board's True-Up Revised Budget for Fiscal Year 2024. New Jersey LCV advocates for clean air, clean water, and equitable access to open space for all New Jerseyans. The work of the New Jersey Board of Public Utilities (or "Board"), is vital to achieving the goals of avoiding the worst effects of climate change through a just transition to clean energy.

The Board has shown strong commitment to renewable energy technology through increased funding for offshore wind in preparation for the fourth solicitation and budgetary increases to electric vehicle programs. This shows leadership at a time when there have been large-scale disinformation campaigns discouraging clean energy investment, despite immense federal incentives and funding for clean energy projects. Significant funding is needed to support the stabilization and growth of our energy transition, and we commend the Board for making financial commitment to a clean energy future as shown through your budget.

### **Comfort Partners Program**

As stated in the Comfort Partners Program proposed description and budget, Comfort Partners addresses several barriers to achieving energy affordability for low-income households through "comprehensive, personalized customer energy education and counseling; direct installation of cost-effective energy efficiency measures; and installation of health and safety measures".<sup>1</sup> As part of such, we encourage that in addition to the stated goal of serving a specific number of electric and natural gas service customers, the Board should include health and safety measures as appropriate, as well as meaningful reductions to energy burdens for low-income households. While energy burdens are federally determined at 6% of a household's income, the Board should consider what threshold makes sense for New Jersey residents and, through this program, help offset energy burdens to percentages below that threshold. We recognize safety measures need to come first, such as addressing gas leaks. However, carving out more explicit

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<sup>1</sup> [Revised Draft FY24 True Up Comfort Partners Compliance Filing.pdf \(njcleanenergy.com\)](#)

goals, in addition to the suggested tactics, will allow the public to get a better sense of how we are meeting the goals of the Comfort Partners Program.

Comfort Partners is a multi-pronged program that relies on public awareness in order to implement changes to energy costs. New Jersey LCV encourages the Board or its contractor TRC to think creatively on how to promote this program to reach targeted program audiences who are less inclined to engage with or be exposed to this program – such as those with limited English proficiency, renters, and younger and older demographics. Consideration should be put into partnering with community-based organizations to help disseminate information on Comfort Partners and other BPU assistance programs to low-income census tracts in New Jersey.

We would appreciate an explanation of the breakdown of funding allocations for electric versus gas services for utilities. As an example, for PSE&G, over two-thirds (\$22 million) of the funding goes towards gas, and less than one-third (\$9 million) towards electric, when the goal is to serve almost the same number of electric users as gas users in the state. While acknowledging the fiscal challenge of addressing fossil fuel infrastructure due to aging infrastructure, we encourage the Board to provide information on the large disparities between funding of programs.

### **Residential Customer Relief Assistance**

New Jersey LCV commends the Board for allocating \$30 million in additional funding from last year's budget to the energy bill assistance Program Residential Customer Relief Initiative. As gas and electric price increases were just approved and will continue to fluctuate, it's important that the Board is able to provide quick and direct relief to customers facing high energy costs. In addition to quick fixes, New Jerseyans also deserve long-term solutions, so we encourage the Board to use this program as an additional opportunity to communicate with low-income customers other available programs that will provide long-term relief, such as the Comfort Partners Program or the Whole Home Pilot Program when it becomes available statewide.

### **Combined Heat and Power – Fuel Cell (CHP-FC) Program**

New Jersey LCV is encouraged to see an increase of approximately \$1.7 million to the original proposed \$18 million FY24 line item for the CHP-FC Program. The Combined Heat and Power ("CHP") – Fuel Cell Program offers incentives for efficient technologies to produce electricity, and can function as microgrids and provide resiliency to the grid. A 2023 report by the Board highlighted that New Jersey's adoption of fuel cell systems will complement responsibly developed offshore wind and solar in a 100% clean energy future, and the Garden state "is ideally positioned to serve as a regional hydrogen hub for the Northeast".<sup>2</sup> However, regarding hydrogen, New Jersey LCV remains concerned that not all hydrogen is created equal – and the Board should only utilize clean hydrogen that is produced through electrolysis through the input of excess clean, renewable energy.

Unlike fuel cells, CHP does combust the fuel it consumes, so lower carbon- and co-pollutant-emitting fuel types should be the preferred inputs to these systems. We are encouraging the

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<sup>2</sup> [Fuel Cell Task Force-FInal.pdf \(nj.gov\)](#)

state to continue exploring ways to bring more alternative fuels into the state through mechanisms such as a low carbon fuel standard. The Board should consider creating incentive structures that encourage a facility's utilization of alternative, lower-carbon emitting fuel types, which in addition to lowering emissions, have been demonstrated to have in-community air quality benefits.

### **Planning and Administration**

Like many agencies, the Board is underfunded and understaffed, making it difficult to accomplish administrative, legislative, and agency goals within a timely manner. The Board of Public Utilities is a vital agency to our clean energy transition, and New Jersey LCV is glad to see the increase of \$1.5 million towards BPU Program Administration for FY2024. New staff members will enable the agency to accomplish its goals, while increasing transparency to the public and collaboration between other agencies.

New Jersey LCV applauds the budget increase towards Program Evaluation and Analysis to support the Board in applying for more federal funding opportunities and to understand the progress the state has made on the strategies of the Energy Master Plan. If there is funding leftover from this reallocation, we encourage the Board to use those dollars to support conducting an analysis on innovative programs such as the Whole Home Pilot Program, or the Multi-Unit Dwelling Chargers Program, to improve outreach to community members who could best take advantage of those benefits. As new studies by the Board arise, we urge the Board to utilize non-profit and community-based organization (CBO) relationships to promote the findings that come out of Program Evaluation and Analysis.

### **E-Mobility Programs & Electric Vehicles**

A stated goal of the 2019 Energy Master Plan is promoting E-mobility and reducing vehicle miles traveled, but the FY2024 budget has a proposed decrease of \$3 million dollars to this program. In the description of the true-up budget, it provides that the "budget [is] adjusted to reflect updates forecast of participation levels". In the New Construction revised draft, the only mention of e-mobility programs is "in FY24, staff proposed to continue the EV tourism, Clean Fleet and MUD programs, as well as adding E-Mobility Pilot Programs". The intent of the program is to encourage purchase of new e-bikes to reduce vehicle miles traveled, as well as other pilot programs. New Jersey municipalities, especially cities, have shown a strong interest in establishing or enhancing e-bike and e-mobility programs, such as Trenton's recent EV Go initiative, so it comes as a surprise that the proposed true-up budget drops from \$7 million to \$4 million.

In addition, the Board staff suggested the line item transfer of \$3 million from the e-mobility program, and a \$1.5 million transfer from the EV studies, pilots and administrative support program, to bring \$4.5 million for the Electric School Buses pilot program. While this is technically allowed under the law PL 2022 c.86 signed by the Governor two years prior, the \$80 million carryforward from last year's budget could have allocated \$4.5 million towards the EV school bus program instead of drawing funds from one of the few programs that incentivizes e-mobility in the state.

### **Increased Transparency**

New Jersey LCV appreciates that the comment period has been extended to allow for more time for meaningful public engagement, especially when the stakeholder meeting was held three business days before the close of the initial comment period. Budgets tell us where an agency puts their values, so it's important for the public to have an opportunity to provide meaningful feedback. We encourage that comment periods be relatively proportional to the length and scope of documentation, with a minimum of 10 business days for review.

While we appreciate the Board's work to make the budget more understandable to the public, we believe the Board can go further. Specifically, in the webinar meant to explain the budget, the primary budget document, one of six, was read to the public, with limited additional information embedded, and no question and answer portion of the webinar. Some of the questions in public comment, such as descriptions for budget adjustment, "to reflect previous encumbrances/updated forecast of participation levels", could have been clarified in a question and answer portion of public webinars. We hope the Board considers including further context, either written within documentation or within the webinar explainer, for these items.

### **Conclusion**

Thank you for taking the time to carefully consider New Jersey LCV's comments regarding the NJBPU's FY24 True-Up Budget. If you have any questions, you can reach Allison McLeod, Senior Director of Public Policy, at [allison.mcleod@njlcv.org](mailto:allison.mcleod@njlcv.org).