



NEW JERSEY CHAPTER

1 N Johnston Ave, Hamilton Township, NJ 08609

TEL: [609] 656-7612 FAX: [609] 656-7618

www.SierraClub.org/NJ

Sherri Golden

Secretary of the Board

44 South Clinton Ave., 1st Floor PO Box 350

Trenton, NJ 08625-0350 Phone: 609-292-1599

board.secretary@bpu.nj.gov

RE: BPU Clean Energy Program Request for Comments, Docket No. QO22050327

On behalf of the Sierra Club, New Jersey Chapter, we thank and congratulate the NJBPU on their revised “New Jersey’s Clean Energy Program: New Construction Program.” Sierra Club is the country’s largest and oldest environmental organization, and its New Jersey Chapter represents over 100,000 members and supporters in the state.

We believe the New Construction Program will further the NJBPU’s stated goal to “bring new construction building projects to the next level of energy efficiency (“EE”) and building performance, ... remove barriers to participation, streamline the Program application process, and align the Program with New Jersey’s Energy Master Plan (“EMP”) goals.” The Program provides financial incentives for new construction to exceed current building code requirements, and it removes barriers to participation in NJCEP’s current construction programs. It aligns with Goals 3.1 [Increase New Jersey’s Overall Energy Efficiency] and 4.1 [Start the Transition for New Construction to be Net Zero Carbon] of the NJ 2019 Energy Master Plan (EMP), and supports the Governor’s Executive Order 316 targets. We fully support these provisions of the revised Program.

We commend the Workforce Development component. In the over two years that the NJ Sierra Club has been running monthly Building Electrification webinars, the most common comments from participants have been about finding knowledgeable HVAC professionals to do any part or the entire job of weatherizing and electrifying a building. It is particularly difficult to find an HVAC vendor who will bid (without arm twisting) a 100% electrical cold climate heat pump for whole house heat. We hope that the training that is developed through this Program will also consider factors that are more relevant to upgrading existing buildings as well as new construction (since most of the building stock in NJ is already built, after all). For example, it would be beneficial to have a greater degree of Program control over the length of time it takes to execute all the many steps in weatherizing and electrifying an existing building, while the building is occupied. From comments by our webinar participants, we know a complete job can take a year or more; we would like to see a Program provide controls that limit the time allowed to complete the work.



NEW JERSEY CHAPTER

1 N Johnston Ave, Hamilton Township, NJ 08609

TEL: [609] 656-7612 FAX: [609] 656-7618

www.SierraClub.org/NJ

Comments noted in the Board Staff summary included arguments by fossil gas suppliers and appliance makers that fossil gas appliances were always getting more efficient and thus should be available as a choice to consumers on an efficiency basis. We know the BPU Staff are aware there is a limit of 100% efficiency for burning any fuel, while electric heat pumps, based on a comparable measurement, are 300-500% efficient. We maintain that any appliance that is less than 100% efficient cannot compete on an efficiency basis with an electric one that uses 1/3rd to 1/5th the energy. We foresee a future where Zero Energy construction becomes part of the building code, and fossil gas will not be allowed at all in new construction; **we must start now to limit incentives to be all-electric, not gas.** Specifically, the revised New Construction Program should require electric readiness for all appliances, including electric heat pump space heaters and heat pump water heaters, and require that construction be both solar ready, and EV ready.

Sincerely,

Anjuli Ramos-Busot, New Jersey Director of the Sierra Club

Patricia S Miller, Co-chair, Sierra Club NJ Chapter, Building Electrification Committee

Steven G Miller, Co-chair, Sierra Club NJ Chapter, Building Electrification Committee