

June 12, 2024

Re: In the Matter of the 2024 New Jersey Energy Master Plan  
Docket No. QO24020126

We, the undersigned organizations representing environmental and social justice, business, health, labor, and environmental and clean energy groups, are pleased to submit these comments to the New Jersey Board of Public Utilities (“BPU”) regarding the 2024 Energy Master Plan.

Since the 2019 Energy Master Plan (“EMP”) was finalized, New Jersey has come a long way in setting ambitious clean energy targets that will create good paying, family-sustaining in-state jobs, protect public health, improve air quality, and mitigate the worst impacts of climate change.

We are eager to see the updated EMP as quickly as possible, but what we truly want to see are the actions that implement it at a speed and scale commensurate with the threat we are facing. In doing so, New Jersey must take full advantage of the benefits of historic federal funding made possible by the Bipartisan Infrastructure Law and Inflation Reduction Act, especially in light of the time limitations of this opportunity.

In addition to creating good-paying jobs and helping to mitigate the worst impacts of climate change, implementing an equitable clean energy transition must be a priority. The public health impacts of greenhouse gas emissions and co-pollutants are well-established. More than a third of New Jersey’s counties received a “D” grade or below for ground-level ozone by The American Lung Association. Fossil fuel emissions heighten health risks including strokes, lung cancer, and asthma. Over time, those types of impacts and far more (e.g., more frequent and intense heat waves) will cause healthcare costs, as well as costs associated with lost time at work, to skyrocket.

Below is a short bullet list of our high-level comments for your consideration as a revised EMP is drafted.

#### **Equitable Deployment of Energy Efficiency and Building Decarbonization**

- **Low- and moderate-income families bear a disproportionate burden** of not only the health impacts of maintaining the status quo but share disproportionate energy burdens.
- **Include Clear Plans for Meeting EO 317’s Requirements for Gas Infrastructure Planning.** Customer assistance is critical, but we must also examine why bills are increasing and plan for an energy future that ensures low- to moderate-income customers are not subsidizing stranded assets. Ratepayers should no longer subsidize new gas hookups in new construction or to buildings where there is none. If we maintain the status quo and don’t plan for a clean electricity future, utility bills will increase. Thus, NJ must proceed with the future of gas planning and clearly set NJ on a clear path away from fossil fuels that accounts for the best interest of the rate payer.

- **Prioritize and Improve Access to Energy Efficiency Programs:** For all kinds of heat generation activities, the benefits of energy efficiency are widespread. The state should invest in outreach and education that targets those residents and buildings that can benefit the most; for example, municipalities with the oldest building stock. Energy Efficiency programs should incorporate and integrate improvements to the building envelope to ensure proper sizing of heating and cooling equipment. Programs should also focus on encouraging the switch to high efficiency electric appliances whenever fossil fuel appliances are replaced. Language access is also important to make sure all communities across our state know about the programs they can access. The dollars invested in expanded energy efficiency programs, including incentives, network lists, and installer and consumer education, will have a direct and beneficial effect on our GHG reduction and climate goals.
- **Whole House Retrofit Program:** There is a crucial need for the services this program provides across the state. And in our neighbor Pennsylvania, where a similarly-focused Whole-Home Repairs Program was created with \$125 million in 2022, 17,000 households are already on a waiting list. BPU must efficiently and transparently review the findings from the pilot and share these findings with stakeholders so that the program can scale up and achieve its goals of holistically addressing health, energy burden, and equitable participation in the clean energy transition for New Jersey’s disadvantaged communities. It is also important to revisit previously deferred accounts who applied for Comfort Partners assistance to incorporate health and safety repairs.
- **Energy Assistance and Equitable Access:** Low-income and Black, Brown, and indigenous households experience a disproportionate energy burden compared to higher-income households. Existing state programs help make energy bills more affordable, but without the expansion and improvement of clean energy programs, accessibility will continue to be a barrier. To ensure that no one gets left behind, the coalition urges that the BPU’s Office of Clean Energy Equity is codified as permanent with a dedicated program budget of at least \$50 million annually.

### **Dispelling “Renewable Natural Gas”**

- Renewable natural gas is also sometimes called sustainable natural gas, biogas, biomethane, marsh gas, sewer gas, compost gas, swamp gas and a host of other names.
- RNG is not considered clean energy because it contains methane, a greenhouse gas that contributes to climate change. RNG is made from biomass, such as manure, industrial food waste, landfill gas, and wood. However, methane is released into the atmosphere during extraction, transportation, and burning. Hence, RNG is a false solution to moving to a 100% truly clean energy economy.

## Jobs and Economic Development

- **Pathway to Jobs:** Support well-paying, in-state jobs and ensure equitable access by creating a network of workforce development hubs, in partnership with labor unions, and community organizations, to provide job training and re-skilling resources and wrap-around services, like childcare and transportation.
- **Just transition:** Per NJ's Office of Climate Action and the Green Economy 2022 report, NJ must launch research on potential future impacts, assemble a multi-stakeholder working group to identify new utility business models and a clearly defined transition report, and explore the creation of an "impact" fund, all focused on workers, their families, and communities.

## Transportation

- **Consistent and increased investments in mass transit and bus electrification:** We are consistently focused on maintaining our current reliance on car culture and rewarding suburban lifestyles that are highly energy intensive. It's important to move toward electrification in the transportation field and secure consistent and dedicated sources of funding for clean mass transit. The EMP must prioritize funding systems that will actually let people drive less. This means investment in clean, reliable, electrified mass transit (trains, rapid bus service, intra-city shuttles, etc.), safe pedestrian and biking infrastructure, and land use regulations that allow homes and businesses to be built closer to each other.

## Energy Storage

- **Jump-start storage at all levels:** We reiterate the need for energy storage as a strategic and significant technology necessary to achieve our transportation and clean energy goals and that this technology will be needed throughout the distribution system. The EMP needs to position storage more clearly as a strategic imperative and establish stronger/faster goals on the implementation of storage, including recognition of the many types of storage that might be involved. The EMP must outline clear storage goals along with suggested incentives at the local, county, and state level. We should also be thinking creatively on how to use some of the state's resources as natural batteries, implementing and incentivizing neighborhood-based distribution systems and better utilizing combo systems like e-mobility and thermal networks tied to district storage. We're used to thinking about energy problems on a large scale, but exploring widespread adoption of micro-solutions should also be considered.

## Offshore Wind

- **Continue momentum on offshore wind and transmission:** We thank and appreciate Board staff for all their work in accelerating the offshore wind project solicitation

timelines. The continued advancement of Solicitation 4 is demonstrative that NJ is committed to offshore wind. It is imperative that NJ continues to move forward on responsibly developed offshore wind, including additional planning for and investments in transmission infrastructure and other grid upgrades, to ensure the interests of New Jerseyans and vulnerable wildlife are protected.

## **Public Awareness**

- **Educate on the true cost of inaction:** Education and public outreach centered on informing the public about the everyday dangers of pollutants indoors and outdoors, as well as the full suite of health impacts that climate change will bring to NJ communities (partially demonstrated by months of wildfire smoke and extensive and repeated flooding across the Northeast in 2023) and what are available solutions to reduce risks must be well funded and promoted. The true cost in both medical and economic costs, related to the full suite of impacts of climate change on human health must be a major priority in the public discourse and aligned with serious policy and regulatory decisions.
- **Prioritize outreach on existing programs:** It is imperative that programs already established by the Board, as well as those that exist at the federal level, are providing the most benefit to New Jerseyans as intended. While these programs exist, many of the eligible public may be unaware and not take advantage of them. Dedicated funds, especially those for low-income communities, must effectively address the disproportionate health, social, and energy burdens they experience and in order to do so, a large-scale effort must be made to ensure they are educated on what programs are available. A robust outreach plan throughout the year, consisting of collaboration with local community organizations, is critical to spread awareness of these programs.

## **Federal Implementation**

- New Jersey must take full advantage of all federal incentives and benefits made possible by the historic Bipartisan Infrastructure Law and Inflation Reduction Act, especially in light of the time limitations of this opportunity. These federal funds should be additive to the funding that New Jersey is already dedicating to our transition to clean energy.
- Federal money is also available to local governments. The EMP should support local municipalities, particularly disadvantaged municipalities, in planning clean energy projects and procuring financing. Local government entities currently lack awareness, capacity, and/or technical resources to “unlock” federal dollars such as tax credits for renewable energy investments.

Thank you for the opportunity to submit written comments.

Sincerely,

New Labor  
Green Faith  
Operation Grow Inc.  
Greater NJ Gateway Climate Reality Project  
New Jersey League of Conservation Voters  
New Jersey Sustainable Business Council  
New Jersey Progressive Equitable Energy Coalition  
Clinicians for Climate Action NJ  
Action Together New Jersey  
Emerald Cities Collaborative  
New Jersey Policy Perspective  
Fair Share Housing Center  
Oceantic Network  
Isles  
Jersey Renews  
Latino Action Network Foundation  
Latino Institute, Inc.  
Energy Efficiency Alliance  
Ceres  
Vote Solar  
Elected Officials to Protect America  
Metuchen-Edison-Piscataway Branch - NAACP  
Newark Green Team  
MnM Consulting  
Housing and Community Development Network of NJ  
Regional Plan Association