

Board Secretary  
NJ Board of Public Utilities  
44 S. Clinton Avenue, 7<sup>th</sup> Floor  
Trenton, NJ 08625

June 12, 2024

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

Dear Board Secretary:

We, the undersigned organizations representing the [Jersey Renews](#) coalition including representatives from labor, business, environmental, community, health, and faith organizations, are pleased to submit these comments to the NJ Board of Public Utilities regarding the 2024 Energy Master Plan (EMP).

We need to ensure that our actions to build the clean energy economy occur at the speed and scale commensurate with the threat we are facing. New Jersey also needs to maximize federal investment from the historic Bipartisan Infrastructure Legislation of 2021 and the Inflation Reduction Act of 2022. While working to combat climate change and turbocharge the green economy, ensuring that the transition is equitable is vital to a truly clean energy future and economy.

To reach these goals, we greatly appreciate your attention to the following key actions that should be incorporated into the 2024 EMP. Our recommendations focus on clean energy like wind, solar and battery storage, clean electrification transportation options, and strengthened energy efficiency programs focused on expanding equity for NJ households.

**Offshore Wind and Clean Energy Like Solar/Community Solar (*Strategy 2 & Strategy 6*):**

- **Ensure current wind projects are developed and continue and expand offshore wind procurement and related transmission projects:** Over the past five plus years, New Jersey has been a national leader on offshore wind, completing multiple procurements for over 4,000 Megawatts of generation and a unique state agreement approach to transmission in partnership with the PJM electric grid, in addition to making historic investments in the NJ Wind Port in South Jersey. Our state is on the precipice of building a major new industry that could support thousands of good paying, union jobs, but we cannot backslide or become complacent in the progress we have made so far. We must continue to invest and grow the industry to attract supply chain businesses and ensure that turbines are actively producing electricity in the next five years if we want to reach our state's clean energy goals and grow the green economy.
- **Adopt policies to facilitate the growth of grid scale solar and community solar:** Along with offshore wind, solar is going to be critical to reaching our state's clean energy goals. We need to prioritize and facilitate the approval, permitting, and building of grid scale solar projects and community solar projects, which ensure the benefits of solar energy can be experienced by low- and moderate-income residents. Development of major solar projects will create good paying, local jobs in all regions of our state, further creating clean energy economy jobs that are accessible to a larger share of New Jerseyans.

**Transportation (*Strategy 1*):**

- We recommend **prioritizing electrification of medium and heavy-duty vehicles** both by 1) providing full funding for NJ Transit to meet bus electrification targets and ensuring that dedicated Clean Energy Fund dollars from NJBPU's Societal Benefits Charge are used for their intended purpose for NJ Transit bus electrification; 2) Moving forward on the long-delayed NJBPU straw proposal provisions for medium- and heavy-duty truck electrification utility programs by establishing minimum filing requirements and prioritizing electrifying fleets in urban, overburdened communities.
- **Consistent and increased investments in mass transit and bus electrification:** It's critical to move toward electrification in the transportation sector and secure stable dedicated sources of funding for clean mass transit. The transition for NJ Transit's bus electrification program requires \$200 million in annual capital expenses per year and is mandated by the 2020 EV bill, with a mandate of full bus electrification purchase of 100% by 2032 and a full fleet conversion by 2040. But the first benchmark of 10% of NJT purchases by end of 2024 won't happen because of a lack of funding. This means investment in clean, reliable, electrified mass transit, including trains, rapid bus service, micro-mobility options like the highly successful electric mobility pilot, GoTrenton, led by Isles.

### **Energy Efficiency (*Strategy 3*):**

- **Fund Energy Efficiency Programs:** For all kinds of heat generation activities, the benefits of energy efficiency are widespread. Funding and implementation of energy efficiency should be expanded across the state, especially in municipalities with the oldest home stock. 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 climate pollutant reductions and climate goals.
- **Whole House Retrofit Program:** There is a crucial need for the services this program provides across the state. 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. For low-income customers, it is vital to have a program that provides for critical repairs and pre-weatherization work. Without it, too many low-income customers are deferred from our utility and WAP programs, leaving high energy bills and poor housing. This program needs to coordinate with existing home health and safety programs (i.e. lead remediation) and feed directly into energy efficiency programs. **To ensure program success, we urge that the BPU's Office of Clean Energy Equity is codified as permanent with a dedicated program budget of \$50 million annually.**

### **Energy Storage: (*Strategies 2, 3 & 6*)**

- **Position storage as a strategic imperative and establish stronger and faster goals on the implementation of storage:** The EMP must outline clear storage goals along with suggested incentives at the local, county, and state level. We should also be thinking about 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. The NJBPU should move forward with its current energy storage straw proposal this calendar year and increase funding for energy storage through the Clean Energy Fund to ensure we can hit the 2,000 Megawatt energy storage target by 2030 (excluding the inclusion of Yards Creek in Warren County and its existing hydro energy).

Thank you for the opportunity to submit these written comments.

Sincerely,

Drew Tompkins, Director, **Jersey Renews Coalition**

Deb Coyle, Executive Director, **NJ Work Environment Council**

Sean M. Spiller, President, **NJEA**

Kevin Brown, NJ State Director, **32BJ SEIU**

Doug O'Malley, Executive Director, **Environment New Jersey**

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LaSaunda Carter, CEO, **Sanctuary Foundation for Veterans**

Todd Vachon, President, **Rutgers AAUP-AFT**

Richard Lawton, Executive Director, **New Jersey Sustainable Business Council**

Amy Goldsmith, NJ State Director, **Clean Water Action**

Keith Voos, Chair, Environmental Justice Committee, **Metuchen-Edison-Piscataway Branch - NAACP**

Diana Mejia, Co-Director, **Wind of the Spirit**

Charles Loflin, Executive Director, **Unitarian Universalist Faith Action**

Oluwatosin Kolawole, State Organizer, **Greenfaith**

Marcia Marley, President and Executive Director, **BlueWaveNJ**

Winn Khuong, Executive Director, **Action Together New Jersey**