

From: [Graham, Karriemah \[BPU\]](#)
To: [Espinoza, Emeli \[BPU\]](#)
Subject: FW: [EXTERNAL] EmpowerNJ Comments on 2024 EMP Update
Date: Thursday, June 13, 2024 9:35:56 AM
Attachments: [EmpowerNJ Comments to NJBPU on 2024 EMP Update Final.pdf](#)
[EmpowerNJ Comments to NJBPU Regarding Transportation - 2024 Energy Master Plan Update.pdf](#)

Also upload the email

From: Ken Dolsky <kdolsky@optonline.net>
Sent: Wednesday, June 12, 2024 2:41 PM
To: Outreach [GOV] <Outreach@nj.gov>; Governor Philip Murphy [GOV] <Philip.Murphy@nj.gov>; Sadovy, Christine [BPU] <Christine.Sadovy@bpu.nj.gov>; LaTourette, Shawn [DEP] <Shawn.LaTourette@dep.nj.gov>; Miller, Eric [GOV] <Eric.Miller@nj.gov>; Gajda, Henry [BPU] <Henry.Gajda@bpu.nj.gov>; Lykins, Chance [BPU] <Chance.Lykins@bpu.nj.gov>
Subject: [EXTERNAL] EmpowerNJ Comments on 2024 EMP Update

Attached are two documents submitted by EmpowerNJ to the NJBPU containing comments and guidance to ensure the EMP update is successful. One document covers the transportation strategy and the other covers remaining strategies as well as guidance on the overall EMP process and results.

A summary of our comments is provided below:

1. **Make the EMP a Real Plan** - set quantifiable goals, specify resources, set and report on annual milestones, program management structure across all departments, etc.;
2. **Place a Moratorium on New Fossil Fuel Projects** - if we want to get out of the hole, we must stop digging and burning;
3. **Address Methane Leaks** - measure its impact properly, no new gas infrastructure and new gas hookups, and accelerate the use of heat pumps and electric appliances;
4. **Ban or at Least Minimize the Use of Hydrogen** - as a very potent GHG which produces high levels of NOx when burned, only green hydrogen in fuel cells for hard to decarbonize applications should be allowed;
5. **Address the Harms from Air Pollution** - this is inextricably linked to climate and clean energy, justice and health, not just economy or even climate, must also be the focus;
6. **Redefine Clean Energy and Recognize the Dangers of False “Low Carbon” Solutions and Net-Zero Emissions** - NJ can’t rename its way out of its dirty energy problem. These false solutions cost more and only delay long term solution of zero-emissions technologies;
7. **Utilize the Total Costs of Climate Harms and Costs of Mitigation in Creating Policies** - this approach ensures decisions that are easy to defend against all special interests;

8. **Require GHG Regulations Aligned with State Targets** - direct regulation of GHG emissions will ensure reductions in line with State goals. This will prevent work-arounds that let emissions continue;
9. **New Jersey should prioritize public transit over highway expansions** - doing so will help address the climate crisis and will produce far more economic growth;
10. **Acknowledge and Address the Problems Caused by the Lack of a Real Plan** - The lack of a comprehensive plan with specific details on how to achieve State climate goals has created a void and associated chaos in legislative and regulatory actions, further inhibiting and delaying the implementation of true clean energy solutions.

The science is increasingly alarming as to the catastrophic economic and environmental consequences of the current climate crisis. Recent reports have shown:

- Worldwide annual damage from climate change will reach \$38T by 2050;
- Almost 80% of IPCC authors foresee at least 2.5C of global heating, while almost half anticipate at least 3C;
- Carbon dioxide is accumulating in the atmosphere faster than ever. CO2 levels were near 427 parts per million - 4.7 parts per million higher in March than they were a year earlier, the largest annual leap ever measured;
- The average length of the heat wave season across 50 of the most populous U.S. metros jumped from 23.75 days a year in the 1960s to 72.68 in the 2020s

The 2019 EMP was supposed to be the plan that enabled New Jersey to do its part to combat these threats. Unfortunately, as demonstrated in these comments, it was entirely aspirational with major gaps and no tools, resources or processes that could be implemented. It contained 95 goals, only six of which are quantified. Five years later the stakes for this 2024 re-write are even higher. Empower NJ implores Governor Murphy and his Administration to not just say the words “whole of government” approach, sign Executive Orders and create “strategic” climate documents but to actually make a good faith effort to implement plans that can demonstrably achieve such goals as 50% reduction in real GHG emissions by 2030 and 100% clean energy by 2035.

We hope that all departments in this Administration find these comments to be helpful in guiding their actions to achieve the State’s climate and pollution reduction goals.

The EmpowerNJ Steering Committee

Ken Dolsky, Don’t Gas the Meadowlands Coalition

Matt Smith, Food & Water Watch

Doug O'Malley, Environment New Jersey
David Pringle, David Pringle Associates LLC
Amy Goldsmith, Clean Water Action
Tracy Carluccio, Delaware Riverkeeper Network
John Reichman, Blue Wave NJ