



June 12, 2024

Secretary of the Board of Public Utilities
44 South Clinton Ave.
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In the Matter of Docket No. QO24020126 – 2024 Energy Master Plan

Clinicians for Climate Action New Jersey was founded in 2021 to engage New Jersey healthcare professionals in advocating for climate change solutions that will engender the transition to a healthy, equitable and sustainable clean energy future. We are pleased to submit these comments to the New Jersey Board of Public Utilities (BPU) regarding the 2024 Energy Master Plan (EMP).

We are at a unique point in time. The potential benefits (economic and otherwise) of stronger action are quite clear. The public health impacts of greenhouse gas emissions and co-pollutants are well-established. The science, as well as what we each can see happening all around us (e.g., record heat, flooding, wildfire smoke and similar) is the reason why every major professional medical organization across the nation now describes climate change as the #1 threat to public health in the 21st century. Over time, if we do not accelerate our response, these impacts will grow rapidly, causing healthcare costs to rise precipitously.

Over the years since the 2019 Energy Master Plan was finalized, New Jersey has made great strides forward with respect to adopting clean energy and climate pollution reduction policies and programs. As this work continues over the coming years, we look forward to seeing the benefits accrue across multiple dimensions - including protection of public health, rapid growth of the of the NJ clean energy business sector, and the creation of new, well-paying jobs. At the same time, that work will contribute to the push to mitigate the severe health impacts we know will happen in New Jersey and beyond if society continues to fail to act at a scale and speed commensurate to the threat.

Below are a few core comments we wish to highlight:

Transportation

As documented by the NJ Department of Environmental Protection (NJDEP), the transportation sector is the dominant source of carbon pollution in our state (37% of emissions in 2021). As such, decarbonizing this sector is essential to meeting state government's climate goals. In addition, more than a third of New Jersey's counties received a "D" grade or below for ground-level ozone, per the American Lung Association. Fossil fuel emissions heighten health risks including strokes, lung cancer, and asthma. The air pollution impacts are more severe in low-income, densely populated communities located near our highways. That disparity is not acceptable.

The revised EMP must accelerate the equitable decarbonization of the transportation sector through sector-wide electrification, reduction of vehicle miles travelled, wider adoption (and modernization) of public transit, more electric vehicles (including medium- and heavy-duty vehicles), and accelerated buildout of our charging infrastructure. The revised EMP must also address underlying funding issues – including providing funding at levels that recognize that we no longer have 50-100 years to deploy the solutions needed, while also preventing set-aside funding from being diverted to state programs that do not directly address reducing carbon and other pollutants. Given the passing of historic federal legislation, New Jersey is presented with the new financial potential to dramatically reduce the burning of fossil fuels in the transportation. Taking full advantage of that opportunity is essential.

Building Decarbonization & Energy Conservation

As documented by the NJ DEP, the transportation sector is the 2nd most dominant source of carbon emissions in the state (25% of emissions in 2021).

As is true in many parts of the Northeast, much of New Jersey's housing stock is old, resulting in enormous levels of wasted energy and higher household energy costs. We hope that the updated EMP is designed to accelerate the installation of energy efficiency measures (and purchase of electric appliances) - at lower consumer cost. The state must also continue to invest in outreach and education that targets New Jersey's homeowners – including those who own rental properties. In tandem, the revised EMP should focus on related ideas such as updating building code standards. Again, given the recent federal legislation, New Jersey is presented with the possibility to radically change the unacceptable trajectory we are on with respect to energy use in our homes and businesses.

In multiple ways, low-income and Black, Brown, and indigenous households experience a highly disproportionate energy burden (and carbon pollution impact) compared to higher-income households. These disparities must be addressed more aggressively. Existing state programs help make energy bills more affordable, but without the expansion and improvement of these programs, accessibility will continue to be a barrier.

Energy Generation and Storage

We are highly encouraged by the announcement from Governor Murphy that the Administration has raised the offshore wind goal to 11,000 MW by 2040, and by the latest offshore wind solicitation. These announcements continue to place New Jersey in the forefront of states pushing for clean energy generation. We are less encouraged about some of the dialog around solar. Solar is, of course, a widely adopted and growing clean energy industry. The revised EMP must continue to encourage a combination of grid-connected residential and community solar that will provide New Jerseyans with energy independence, clean energy opportunities, and cost savings. Community solar allows renters and low-income residents to access clean energy while reducing their energy burdens. We understand that market conditions must and will have an impact on investments in solar deployment. But, given the climate crisis, those drivers cannot override the idea that we must increase investment across all sources of clean energy generation (and storage) if we hope to meet the challenge at hand.

At the same time, we must ensure the rapid retirement of all fossil fuel-based energy generation – including natural gas. With respect to the latter, it is time to move beyond viewing natural gas as a “bridge” solution. As numerous studies have shown, the collection and transmission of natural gas is fraught with massive environmental and health harms. And the notion that natural gas can move to become “renewable” has no merit whatsoever.

Conclusion

Since the 2019 EMP was finalized, New Jersey has moved into the forefront of states addressing climate pollution. This is a result of wonderful work that has been done setting ambitious clean energy targets. Goals 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 encourage the BPU to adopt a stance that continues the bold and necessary commitment to aggressively accelerate that work. As healthcare professionals we hold the position that society has a moral obligation to reduce carbon pollution as fast as possible. As is being demonstrated every day in New Jersey and across the nation, those actions will yield myriad benefits, including cleaner air, protection of public health, family-sustaining local jobs for low- and medium-income workers, and energy independence. Implementing an equitable clean energy transition must be a priority.

Given the historic federal funding resulting from the Bipartisan Infrastructure Law and the Inflation Reduction Act, opportunities abound to cost-effectively move forward aggressively while growing the clean energy business sector in New Jersey.

Thank you for your work on behalf of all New Jerseyans, and this opportunity to comment on the 2024 Energy Master Plan.

Sincerely,
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Co-Leaders
Clinicians for Climate Action New Jersey