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VIA ELECTRONIC MAIL

Sherri L. Golden
Board Secretary
New Jersey Board of Public Utilities
44 South Clifton Avenue, 1st Floor P.O. Box 350
Trenton, NJ 08625-0350

RE: Docket Number QO24020126, In the Matter of the 2024 New Jersey Energy Master Plan

Dear Secretary Golden:

Suburban Propane writes in regards to the 2024 New Jersey Energy Master Plan (“EMP”), which outlines New Jersey’s guide to achieving 100% clean energy by 2035. Suburban Propane has been headquartered in New Jersey for nearly 100 years and is the nation’s third-largest propane retailer with operations in 42 states. In New Jersey, we currently have 354 employees at 13 locations serving more than 30,000 customers.

Suburban Propane supports New Jersey’s overall goal of reducing its carbon emissions. However, the EMP clearly favors electricity over other fuels, which comes with significant costs and is not an effective way to achieve the State’s clean energy goals. Combatting the impacts of climate change will require a technology-neutral approach that uses all available fuel sources, including: low carbon intensity (CI) traditional propane, lower-CI renewable propane, zero- or negative- CI blends of traditional propane, renewable propane, renewable dimethyl ether (rDME), and renewable natural gas (RNG). Therefore, we ask the Board to adopt a technology-neutral approach that encourages the use of all low-CI energy sources to achieve New Jersey’s emissions reduction goals.

The EMP prioritizes electricity, and while electricity can be a tool in reducing the State’s carbon footprint, rapid electrification is detrimental to decarbonization. If the building and transportation sector move to all-electric too quickly, it further taxes an already overburdened electrical grid. PJM Interconnection, the electric grid operator for New Jersey, saw rising demand for electricity across the region with the development of data centers, which will cause New Jersey residents to see a 17% to 20% monthly increase



on their bills starting in June.¹ Focusing the State's energy policy so heavily on electrification will require more electric power to be generated, which will most likely come from increased electric generation at existing power plants using fossil fuels, thus negating any benefit electrification may provide, and increasing electricity costs for residents.

Meanwhile, other low-, zero, and negative-CI fuels, including those previously mentioned, are already available to consumers and can be used in existing infrastructure, allowing for immediate reductions in carbon emissions and saving residents thousands of dollars in conversion costs. For example, our subsidiary, Suburban Renewable Energy (Suburban Renewables), owns and operates RNG production facilities in Arizona, New York, and Ohio. This RNG is a drop-in replacement for natural gas and can use the existing natural gas transmission and distribution system.

We encourage the State to adopt an all-of-the-above approach that allows a wide variety of low carbon energy sources to aid in reducing the State's carbon emissions. Propane is versatile, reliable, and an abundant energy source that millions of households and businesses use for heating, cooking, and other purposes. Many communities in New Jersey who do not have access to natural gas lines rely on propane.

Suburban Propane is proud to be leading the propane industry in the energy transition to a low-carbon world. Through our Suburban Renewables platform, we are also committed to investing in the next generation of even cleaner, less carbon-intensive energy sources, such as rDME, biogas, renewable natural gas, and clean hydrogen. However, it will take time to bring these new products to widespread commercial scale and the use of propane will be important in reducing emissions in the short term.

We urge the Board to adopt a technology-neutral approach that incentivizes all industry sectors to use low-carbon, carbon-neutral, or carbon-negative fuels. We would appreciate the opportunity to discuss with you how propane, renewable propane, and other low-carbon fuels can play a role in lowering the carbon footprint in the State. Thank you for your consideration.

Sincerely,

/s/ M. Douglas Dagan

M. Douglas Dagan
Vice President, Strategic Initiatives –
Renewable Energy
Suburban Propane Partners, L.P

¹ [Already 'outrageous' N.J. electric bills are going up by about 20% this summer - nj.com](#) (accessed April 18, 2025)