

May 1, 2025

Sherri L. Golden, Secretary NJ BPU  
44 South Clinton Avenue  
Trenton, New Jersey 08625-0350

**RE: Docket Number QO24020126**

Dear Secretary Golden:

These comments are submitted on behalf of the Fuel Merchants Association of NJ and NJ Propane Gas Association. The 2024 NJ Energy Master Plan was not made available for public comment. The only document made available was a 62-slide Power Point executive summary.

- According to Rutgers, the *average* temperature in New Jersey in January 2025 was 28.3°F.
- Field observation (and [Rewiring America](#)) finds that electric heat pumps operate at a coefficient of performance of 2:1 when it is cold outside. That is if homeowners continue to use them since they do not provide adequate comfort when it is cold.
- Below ranked is the most to least expensive method of heating a residence in New Jersey in January 2025 based on the US Energy Information Administration's average residential expense for each of the fuels (When its too cold for heat pumps to provide adequate comfort they rely on electric resistance heat for back up.)
  1. Electric Resistance
  2. Electric Heat Pump (COP 2:1)
  3. Propane
  4. Heating Oil
  5. Natural Gas
- What is the definition of "envelope upgrade?" NYSERDA reported it was over \$45,000 to \$52,000 for a single-family home deep shell retrofit in 2022.

The 2024 Energy Master Plan doubles down on Governor Murphy's unaffordable, unrealistic and one size fits all policy of "electrify everything" in the building and transportation sectors. This is being done without a delegation of authority from the NJ Legislature.

Sincerely,



Eric DeGesero  
President