



UTILITY and TRANSPORTATION CONTRACTORS ASSOCIATION of NEW JERSEY

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May 1, 2025

VIA ELECTRONIC MAIL

Sherri L. Golden
Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue, 1st Floor
Trenton, NJ 08625

RE: UTCA Comments on Docket Number QO24020126, "2024 New Jersey Energy Master Plan"

Dear Secretary Golden,

Please accept the following comments on the above referenced document on behalf of the Utility and Transportation Contractors Association of NJ (UTCA). Thank you for the opportunity to comment. UTCA recognizes the energy policy concerns expressed in the Energy Master Plan (EMP) 2024 findings report and encourages you to consider the following comments prior to making the newest version final.

UTCA understands the ambitious goals set by the Murphy Administration and the Legislature related to clean and renewable energy and is supportive of a diverse portfolio of energy sources and investments in associated infrastructure. However, we also believe that the wider environmental aspects of clean energy goals (including air quality) are best measured incrementally as opposed to relying on a binary, "clean vs. dirty" metric. Progress is, by definition, transitory, and the state strategy to reach any goals should reflect that fact. Energy sources that make a measurable improvement to public health are a viable and necessary step towards a cleaner energy future and should not be dismissed.

As such, we acknowledge the 2024 EMP findings report recognizes the affordability constraints pertaining to upfront equipment costs and expected impacts on electricity bills but fear many technical aspects have been

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considerably overlooked by its authors. Most programs implemented through the EMP are not geared toward industry. We all want to combat climate change and agree that sound policy is needed to reduce our carbon footprint. However, a “no regrets” policy, as outlined in the findings report, is intellectually and ideologically dangerous and will potentially plague the state with unintended consequences if any one area is not given its necessary depth of attention. As the political landscape is prone to shift this coming November, collaborating closely with industry stakeholders to develop energy goals that increase reliability, expand capacity, promote investment in infrastructure and stand the test of time is of paramount importance.

Please accept the following additional comments relevant to the UTCA:

Electrification of the Transportation Sector

While the Advanced Clean Trucks Rule and Advanced Clean Cars Rule may be dubbed a “win” by the current Administration, it is only masking the negative impacts that will eventually fall upon the state taxpayers, supply chain and our economy. Specific to trucks, several challenges persist following the January 1st, 2025 effective date:

- **Medium to Heavy-Duty Electric Vehicle Availability:** There are currently limited models and production challenges to meet contractor demands. Waiting lists will become the norm and delivery delays will disrupt efficient and effective operations.
- **Charging Infrastructure:** The charging network is far from adequate, especially in the rural areas of the State. Long lines and longer wait times at charging stations will financially impact the construction of critical projects.
- **Cost of Maintenance:** The theoretical lower operating costs of the vehicles are offset by the high costs of maintenance. Battery disposal will become New Jersey’s next environmental legacy—in a negative manner.
- **Increased Operational Costs:** Rather than investing in New Jersey residents that work for our member companies, employers will be forced to deploy their capital differently, reluctantly crippling their own employees financially.
- **Disruption to Business Growth:** The mandate will continue to stifle growth strategy. Capital committed to hire new employees, take on new projects, or expand into new markets will need to be directed to electric trucks hindering economic development.

To this date, there is no proven technology available that can successfully compete with current diesel construction equipment. Many contractor companies have partnered with truck manufacturers to find viable ways to electrify their haul trucks and heavy-duty fleet

vehicles, but the Administration's timeline must align with where manufacturers say they can deploy these vehicles. UTCA has previously expressed and remains willing to partner with the state to investigate alternative options related to electrifying medium-and-heavy-duty fleets that are critical to the successful delivery of infrastructure projects statewide. Rather than forcing mandates on industry without necessary infrastructure to back them, the updated EMP must adopt programs that support the **voluntary** replacement of equipment and vehicles that are more energy efficient and use cleaner fuels. At the least, there must be sober recognition of the industry's barriers to available technology and perhaps exemptions where warranted.

Deployment of Renewable Energy and Distributed Energy Resources

UTCA supports strategies to accelerate utility scale renewable and cleaner energy generation and storage, including but not limited to solar and offshore wind. New, in-state cleaner energy production should be expanded, including offshore wind opportunities, utility scale solar, nuclear and natural gas. We should not limit our energy portfolio to these sources alone; newer technologies such as renewable natural gas and hydrogen should also be explored so we maintain a robust, diverse energy portfolio. Furthermore, increased investments in modernizing New Jersey's natural gas distribution infrastructure will continue to drive emissions reductions through those upgrades, increase reliability and enhance public safety. The 2024 EMP must incorporate the continuation of gas modernization programs throughout the state. **UTCA remains strongly opposed to any moratorium on fossil fuel infrastructure.**

Thank you for the opportunity to comment.

Sincerely,



Kyle England
Director, Environmental and Utility Operations

About the UTCA of NJ

The Utility and Transportation Contractors Association of New Jersey is a non-profit trade association headquartered in Wall Township, New Jersey. Founded in 1965, UTCA represents approximately 1,000 member firms in the public and private sectors, active in all phases of heavy, highway, utility, and marine construction, as well as site work including remediation of brownfields and contaminated sites.