



May 1, 2025

New Jersey Board of Public Utilities  
Submitted electronically to Docket No. Q024020126

**RE: EDF Comments on New Jersey Board of Public Utilities' 2024 New Jersey Energy Master Plan findings**

Environmental Defense Fund appreciates the opportunity to provide comments on the Board of Public Utilities' 2024 Energy Master Plan's findings. The Environmental Defense Fund ("EDF") is a membership organization with over 3 million members and supporters globally and more than 110,000 New Jersey members and activists, whose mission is to preserve the natural systems on which all life depends. Guided by expertise in science, economics, law, and business partnerships, EDF seeks practical and lasting solutions to address environmental problems. EDF conducts extensive research around the environmental, climate, and social implications of various climate initiatives, some of which are touched upon in the BPU's Energy Master Plan.

Given that the full findings report has not been released, we are unable to provide detailed comments to help shape the next Energy Master Plan to one that will set New Jersey on a path of further economic development and environmental sustainability. We look forward to the release of the full findings to complement the released findings slide deck so that we may be able to provide additional comments.

In the meantime, we will reiterate that the following areas should be considered carefully when crafting the next Energy Master Plan:

- The value proposition of decarbonizing transportation continues to be strong; our previous set of comments outlines the significant benefits that achieving this transition will have, including by putting downward pressure on electric rates. The EMP should prioritize medium- and heavy-duty vehicle segments – including port operations such as drayage – given the outsized benefits and the current barriers to entry that exist for their transition.
- New Jersey should redouble its efforts to modernize electric distribution systems to support faster vehicle electrification, which will benefit additional sectors beyond transportation, including continuing to pursue rules requiring long-term grid modernization planning. Relatedly, and in order to support New Jersey's goal of maximizing solar development and distributed energy resources by 2050, New Jersey should require transparent and verifiable hosting capacity maps and transparent interconnection cost estimates.

- New Jersey should require long-term planning for gas utilities that includes non-pipeline alternatives (e.g. demand response, energy efficiency, thermal energy networks, building electrification, and industrial electrification.) By continuing to pursue business-as-usual infrastructure expansion strategies that do not consider alternatives like non-pipeline options, gas utilities will continue to expose the system to ever-increasing stranded assets and New Jersey will likely fail to meet its climate goals.
- New Jersey must develop strong guidelines for responsible hydrogen usage that specify that hydrogen is targeted for use only for the hardest to abate sectors. Hydrogen has the potential to play an important role in achieving decarbonization goals, but policy must be carefully designed to avoid a net increase of emissions from the hydrogen industry and harm to surrounding communities. Our previous comments provide extensive detail about the safety, health and climate considerations that exist for hydrogen deployment.
- Throughout, we encourage the EMP to pursue energy justice through local stakeholder participation.

We would be glad to clarify any of the above or provide further details; BPU staff should contact Dr. Karla Sosa ([ksosa@edf.org](mailto:ksosa@edf.org)), Manager, New Jersey State Affairs.