



COMMENTS

Comments on Draft 2024 Energy Master Plan BPU Docket No. QO24020126

May 1, 2025

Chris Sturm: (609-213-4563)

16 W. Lafayette St.
Trenton, NJ 08608
p: (609) 393-0008
f: (609) 360-8478
w: njfuture.org

New Jersey Future submits the following comments on the draft Energy Master Plan, based on our participation in the March 13th Stakeholder meeting and review of the 2024 New Jersey Energy Master Plan Executive Summary DRAFT.

New Jersey Future commends the Board of Public Utilities for its commitment to update the 2019 Energy Master Plan.

When adopted in 2020, the Energy Master Plan included an ambitious yet much-needed goal of 100% clean energy by 2050, which became a model for the country and was quickly embraced by other states. Reflecting the urgency of the climate crisis, the clean energy goal was updated in 2023 to 100% by 2035. At a time when the federal government is abandoning its support for clean energy, it falls to the states to continue to carry the flag and enact meaningful initiatives that will provide affordable domestic sources of energy while mitigating climate change in a way that is consistent with other priorities of the Murphy administration, and which are equitable for all residents.

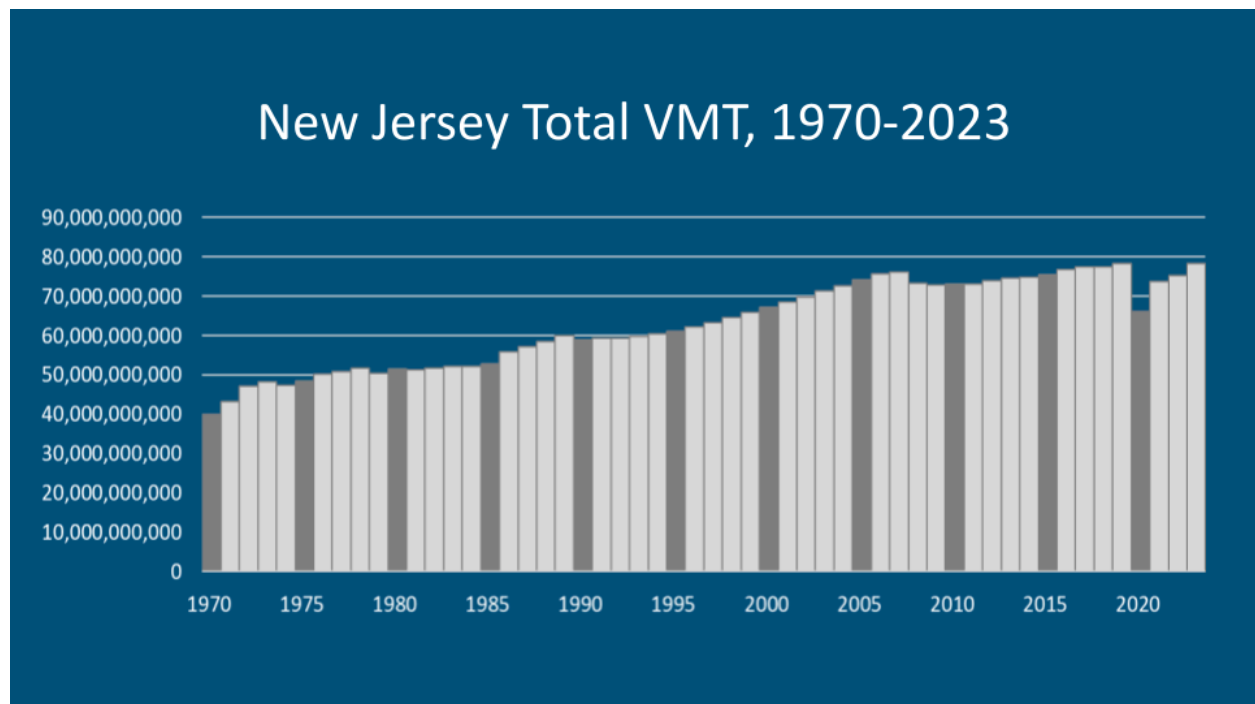
The proposed draft EMP has the potential to lead us to a brighter future for *all* New Jerseyans, provided its provisions for the transportation sector are revised to rely not only on electrifying the transportation sector but also on reducing the amount of driving or Vehicle Miles Traveled (VMT) that occurs.

We respectfully urge the Board to diversify its transportation sector strategies by adding provisions to reduce the amount of driving overall, as measured by Vehicle Miles Traveled (VMT). VMT reduction should be considered a “no regret” climate action that New Jersey can pursue in the very near term because it has significant benefits for both climate mitigation and ratepayers and no significant downsides. In the EMP Executive Summary Draft, only one of the four scenarios, the Demand Management scenario, called for VMT reductions, and it does so in a limited fashion based solely on “urban design and public transit based on the 80x50 report”.

Following below are three reasons why adding VMT reduction as a “no regret” climate action can enhance New Jersey’s ability to reach its decarbonization goals, address the needs of residents of all incomes, and advance other state priorities:

1. **Continued growth in VMT will offset reductions in GHG emissions from the transportation sector and must be factored into the modeling for the 2024 EMP.**

VMT has been rising steadily in New Jersey since 1970, with short-term drops due to the 2008 recession and the pandemic. (See the chart below, which shows 2023 VMT figures coming close to pre-pandemic levels.)



Employing dual strategies to lower GHG emissions from the transportation sector is a lower-risk approach that can hedge against unanticipated challenges, such as lower Electric Vehicle adoption, federal government administrations that oppose clean energy, and slow progress in installing EV charging stations.

Meanwhile, New Jersey is well-suited for VMT reduction, as documented in our recent report, [The Case for a Successful Vehicle Miles Traveled Reduction Effort in New Jersey](#). Given New Jersey's density and development patterns, VMT reduction represents an achievable and strategic goal for meeting the state's climate objectives. New Jersey can learn from the success of other states, many of which have adopted per capita and total targets for VMT reduction, along with implementing strategies.

2. **Unlike electrifying vehicles, reducing VMT benefits people of all incomes by providing low-cost, healthy alternatives to driving everywhere, including walking, biking, and taking transit.** People with lower incomes own fewer cars, on average than those who are more affluent, and some households are car-free. Residents rely more

heavily on walking, biking, and taking public transportation. Those who can afford a car are less likely to purchase a *new* car and even less likely to purchase an EV, which is typically more expensive, and for which charging in urban areas can be very inconvenient. Alternatively, improving walking, biking, and transit benefits lower-income people.

3. Investing in walking, biking, and public transit integrates with and advances other state government priorities, including the following:

- a. The Target Zero Commission is working to improve pedestrian safety and reduce pedestrian fatalities to zero by 2040.
- b. The commitment to “fix” NJ Transit. In particular, efforts to boost ridership can increase fare revenues and lead to more sustainable financing and much-needed service improvements.
- c. Adoption of the proposed update to the NJ State Development and Redevelopment Plan, which calls for multi-modal transportation, transit-oriented development, and walkable communities.
- d. Making New Jersey a more affordable place for young adults and older adults alike, thereby stemming outmigration, which had the fourth highest rate of outmigration of any state in 2023.

On behalf of New Jersey Future, thank you for the opportunity to comment. Please reach out to me with any questions at csturm@njfuture.org.

Sincerely,

Chris Sturm
Policy Director for Land Use, New Jersey Future