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Board of Public Utilities To: Attn: Sherri L. Golden board.secretary@bpu.nj.gov

Re: Docket No. QO24020126

Secretary Golden:

Thank you for the opportunity to submit comments on the New Jersey Board of Public Utilities

(BPU) updated Energy Master Plan (EMP).

RPA is an independent, non-profit regional planning organization that works to improve the prosperity, infrastructure, sustainability and quality of life of the New York-New Jersey-Connecticut metropolitan region. Since 1929, RPA has produced four comprehensive longterm plans to direct the growth, development, and sustainability of our region. The ideas and recommendations from these plans have shaped the region's infrastructure, open spaces, and economic development projects for the past century.

Building on this legacy, RPA strongly supports Governor Murphy's directive to update New Jersey's Energy Master Plan, particularly at a time when state climate action has never been more important.

Moving More Towards Clean and Renewable Energy

New Jersey has set a timeline to achieve 100 percent clean energy by 2035, reflecting an acceleration from the 2050 goals set in place by the previous Energy Master Plan. As the latest science - and experience - tell us, this is an ambitious, but necessary target. In order to achieve this goal, New Jersey will need to significantly increase production of electricity from clean sources (solar, wind and storage), while ramping down fossil-fuel based power generation. The state has made progress towards this goal, but there is still much to be done.

Offshore Wind

Waning federal support and ongoing supply chain issues will make it very difficult for the State to meet its current goal of developing 7,500 MW of offshore wind energy generation by 2035. The state should take the following actions to ensure that New Jersey is offshore windready for when the pause is lifted and development can resume.

Review and adapt future goals and solicitations

Due to the aforementioned delays, the state must analyze and amend the current offshore wind goals to reflect the current conditions, capacity, and timelines of future projects to provide more certainty to the industry, while maintaining ambition. The state should evaluate and update the solicitation process and the corresponding Offshore Wind Economic Development Act (OWEDA) to learn from previous challenges and increase the chance of success. This will allow the state to better predict and plan for realistic project costs which will greatly facilitate future development.

Continue current and future transmission and port planning and investments

Despite recent setbacks nationally and in New Jersey, the offshore wind industry is not going away, and will - in time - pick up again in the state. New Jersey should take every step it can to ensure that the state is offshore wind-ready, investing in port infrastructure, and preparing the grid for offshore wind connections so that when the time is right, there will be a seamless transition. One of the most important steps towards this is to advance the solicitation of the Pre-Build Infrastructure (PBI) by awarding the project and supporting its construction. This will ensure certainty to offshore wind developers that a fully developed, critical, onshore transmission pathway exists for their projects to connect to the grid in the coming decades. The state should also explore a State Agreement Approach 2.0, modeling it after the landmark agreement with PJM that set out to streamline offshore wind transmission in the state. To do this, the State Budget must provide BPU with the resources necessary to adequately review and approve offshore wind transmission projects, and participate in regional transmission planning efforts.

The BPU and EDA should also work together to complete Phase 1 of the NJ Wind Port, find alternative uses for the port until it can be used to construct NJ offshore wind projects, and propose a timetable for Phase 2 investments, based on different project development scenarios.

Promote community benefits and increase engagement

The state has the opportunity to foster a relationship between offshore wind developers and host communities over the next four years, and should support those relationships and facilitate collaboration at every point. Communication is key to getting renewable energy projects built, and the state should continue its work communicating with host communities about ongoing plans and construction of transmission infrastructure, as well as creating public forums for comments and engaging with community and industry leaders.

Future-Proof Offshore Wind and Other Grid Infrastructure

As extreme weather events become more frequent, temperatures rise, and sea levels increase, it is imperative that transmission infrastructure be built with the future in mind. The updated Energy Master Plan should direct the BPU to work with local utilities and PJM to modernize their equipment and make it more resilient to an unpredictable future. This includes supporting workforce development for the trade workers who will build and maintain this critical infrastructure in the future and maintaining and growing partnerships with unions such as IBEW.

<u>Solar</u>

Continue to advance solar and explore opportunities for large-scale solar

New Jersey established itself years ago as a leader in the development of solar energy, particularly at the local level. Since the last Energy Master Plan was released, the state has reached 5 GW of installed solar capacity, with around 250 MW of community solar approved in LMI communities. New Jersey is making great progress on installed solar capacity, and should continue to encourage homeowners, commercial/industrial owners, and builders to make the transition. The State and local municipalities should continue to collaborate with grassroots organizations to develop long term plans for how land and rooftops could be used to host solar arrays. Expansion of the state's solar incentive program for residential buildings could help New Jersey reach its energy targets sooner and allow for more residents to receive the benefits of solar energy.

Implement Automated Permitting for Residential Solar and Storage

While the state has made enormous strides in residential solar installations over the last five years, homeowners still face numerous barriers and bureaucratic processes to rooftop solar and storage installations. Advancing legislation in requiring the establishment of an automated permitting platform for municipal governments specifically for residential solar and storage, such as S4100/A5264 introduced in early 2025, will help New Jersey meet and exceed the state's solar generation goals and provide cost savings to residents throughout the state.

Energy Storage

Advance Utility-Scale Energy Storage to Pair with Offshore Wind and Other Renewables

Incorporating energy storage into the grid as more renewable resources come online will be essential for reliability, stability, and efficiency. In particular, pairing storage with offshore wind will help to ensure that New Jersey can effectively transition away from fossil, and other non-renewable fuels, and achieve a better and more just climate future. The BPU should develop an energy storage roadmap that clearly lays out how and when energy storage can be safely added to the grid and paired with offshore wind and other renewables to meet the state's climate goals, and phase out non-renewable energy. The Energy Master Plan should support legislation that incentivizes transmission-scale energy storage, such as S4289/A5297 introduced in early 2025, to ensure large scale energy storage systems that are necessary for offshore wind and grid reliability are built.

Other/Existing Energy

Clarify the role of nuclear power in New Jersey in the long-run

Over 40% of New Jersey's power comes from nuclear energy, which emits nearly zero greenhouse gases, but has other environmental impacts of concern. New Jersey's nuclear facilities are also aging. RPA calls on the state to work with utility companies, and PJM to clearly lay out the role that existing and potentially new nuclear energy could play going forward, in ways that are safe and environmentally responsible.

Responsibly ramp down fossil-fuel power

New Jersey has made significant progress in its effort to ramp down fossil-fuel power, with the last coal power plant being demolished in 2022. The state should continue to work closely with utility companies and other stakeholders to clearly chart a path to phase out the remainder of fossil fuel-powered plants in a way that ensures reliability and fair rates. Such a vision should consider how the region moves away from existing power plants, over what time period and if there is a point at which the State will no longer approve new fossil fuel plants or infrastructure. Working closely with community and environmental justice advocates will ensure that communities that have disproportionately borne the burden of polluting energy infrastructure can gain the most from these shifts.

Advance Clean and Reliable Transportation

Transportation is the single largest contributor of greenhouse gases – and other air pollutants – in New Jersey. Despite a well-connected train and bus network, driving remains the primary means of transportation for New Jersey residents. The updated Energy Master Plan must continue to pursue and expand the strategies listed in the 2019 plan for getting more residents out of their cars more often, but also make our transportation sector clean.

Make public transit a viable, reliable, and affordable option

A clean transportation future must include a robust New Jersey Transit system. The state must continue to adequately fund NJ Transit operations and capital construction, and should consider targeted service improvements and expansions to make transit a more viable option for more residents. New Jersey must also make good on its commitment to zero emissions buses. Federal support has flagged on this front, but the state needs to continue prioritizing the electrification of rolling stock, especially along shorter, urban routes.

Similarly, the state must have a sharpened focus on transit-oriented development to ensure that we are maximizing the number of people and businesses with direct access to the system. The Energy Master Plan should endorse future development around rail stations and other hubs as well as the creation of supportive infrastructure such as safe, walkable streets.

Support the proliferation of electric and clean-fuel vehicles and associated infrastructure

As New Jersey aims for 100% clean energy by 2035, the surest way to reduce emissions from vehicles is by electrifying the vehicles we drive and ride in, or switching to other clean fuels. Despite significant progress on this goal, with over 200,000 light duty EVs on the road and over 4,200 charging stations installed, the state has fallen short of its goal of 330,000 light duty electric vehicles on the road by 2025. The pace of the adoption should be accelerated, and the State should explore ways that incentive programs for EV and other clean fuel vehicles can be expanded and made more attractive while at the same time continuing to invest in infrastructure that supports these vehicles (and reduces range anxiety). The State's \$210 million dollar investment for electric fleet vehicles, including buses, is a good start but more investment should be made towards moving the state fleet towards all electric or zero emission.

Build Gateway Tunnel

The Gateway Program will increase resiliency and capacity along a 10-miles stretch of the Northeast Corridor rail line between Newark, New Jersey and New York Penn Station. This section of the corridor handles approximately 450 trains per day and over 200,000 daily Amtrak and NJ TRANSIT passenger trips, and directly serves New York Penn Station – the busiest rail station in America. Gateway will upgrade 112-year old infrastructure which, when complete, will double the train capacity between New York and New Jersey. The program includes the Hudson Tunnel Project, which will build two new rail tracks under the Hudson River as well as additional infrastructure upgrades designed to improve reliability, resiliency and redundancy of the system. The 2024 Energy Master Plan should study the impact the completed Gateway Program will have on our energy system in terms of public transit use and reduction of vehicle miles driven.

Build a Modern, Sustainable and Resilient Grid

The region's electrical grid has not kept pace with advances in energy technology and will require greater investment and coordination among energy providers and regulators across the three states to become a lower-emitting, reliable, and flexible system. As the state shifts toward clean energy, new transmission lines and substations will need to be built to connect this clean energy to the people and industry in New Jersey. This calls for a once in a generation upgrade to our energy system. As the state's energy demand grows, transmission investment is a necessity to ensure a reliable, resilient system going forward.

Plan for a more electrified, renewable region

As New Jersey's population, and the region around it, continues to grow, vehicles and buildings become more electrified, and large loads from data centers and AI infrastructure grow, more electricity will be needed. New grid infrastructure is a necessity to meet the expected demand that will occur from the aforementioned factors. That includes building new and upgrading old transmission and distribution lines and substations, as well as implementing grid enhancing technologies on existing infrastructure and building energy storage systems to manage load.

Adapt the grid for the greater variability of new renewable power generation

The future grid will need to be more flexible, with the ability to store power, distributed with local generation and able to facilitate communication between supplier and user. Energy storage is essential for more variable renewable power generation, especially to balance demand in times of high energy use. New Jersey is only at five percent of its goal of 2,000 MW of energy storage by 2030, and should expand efforts to build energy storage systems throughout the state.

Additionally, we encourage the state to remain engaged in the Northeast States Collaborative on Interregional Transmission to map the way forward across state and grid management boundaries. Increased interregional transmission is key for delivering offshore wind and other renewable energy sources throughout the northeast, and will reduce long term costs as energy demand rises.

Reduce Energy Consumption

Energy conservation through efficiency is the best way to reduce greenhouse gas emissions in the short term, especially in cities. Enacting EO316 and joining the NESCAUM 2024 Memorandum of Understanding were great first steps toward building electrification and efficiency, but more work is needed - including a comprehensive evaluation of existing construction codes. The State should provide technical and financial support to cities and other municipalities working to make this transition.

Conclusion

RPA appreciates the opportunity to provide comments on the updated Energy Master Plan. We are encouraged to see this critical work advance and look forward to continued engagement as the state moves toward a more equitable, resilient, and decarbonized energy future. We welcome the chance to collaborate further to help ensure the plan delivers on its full potential for all New Jerseyans.

Thank you,

Robert Freudenberg Vice President, Energy & Environment Regional Plan Association

Zoe Baldwin Vice President, State Programs & New Jersey Director Regional Plan Association