



ASSOCIATION OF ENVIRONMENTAL AUTHORITIES

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September 16, 2019

President Joseph Fiordaliso
Energy Master Plan Committee
New Jersey Board of Public Utilities
44 S. Clinton Avenue
Trenton, NJ 08625

Dear President Fiordaliso and members of the EMP Committee:

The Association of Environmental Authorities, which represents local, regional, and county public agencies that provide water, wastewater and solid waste utility service to millions of New Jerseyans, respectfully submits the following comments on the draft Energy Master Plan:

We commend the State of New Jersey for making energy planning a priority in this time of significant change that includes growing population, increasing concern about the impacts of fossil fuels, as well as increased flooding and other impacts of climate change. Our members understand the interplay of water and energy --how electricity production depends on water and how water/wastewater services depend on electricity and other forms of energy. Indeed, many AEA members including Landis Sewerage Authority, Atlantic County Utilities Authority, Bergen County Utilities Authority, and Hackettstown MUA have been leaders and innovators, thanks to Clean Energy Program funding. Their innovations include solar, wind, EV stations and combined heat-and-power.

The goals of the draft EMP in the timelines proposed are ambitious. AEA is concerned about the impact the EMP's brisk timelines and associated regulation will have on our members' ability to achieve other, equally important, goals having to do with water quality, addressing lead, combined sewers, and emerging contaminants, and upgrading/repairing the State's water and wastewater infrastructure. What impacts will implementation of this plan have on our ability to have the necessary back-up power our members need in times of emergency? That back-up infrastructure is dependent on diesel and natural gas. Our ability to provide 24/7 water and wastewater utility service, even in times of emergency, must be protected.

Another impact to be considered for our members will be sludge and grease disposal. Diesel powered trucks deliver sludge and grease to incinerators for disposal. The incinerators are fired by natural gas and fuel oil. Our ability to process sludge and grease efficiently is an essential environmental responsibility that must be considered.

Very truly,

Margaret (Peggy) Gallos
Executive Director