

Subject: IEP feedback #1 – RMI baselines are starting point, but too early and outdated for NJ IEP model

Dear NJBPU,

NJ Agencies have been tasked by Governor Murphy's 5/28/2018 Executive Order 28 (EO28) and the 7/23/2019 Global Warming Response Act (GWRA) to create an Energy Master Plan that provides:

1. Provide a comprehensive blueprint for the total conversion of the State's energy production profile to 100% clean energy sources on or before January 1, 2050 (EO28)
2. Adopt, pursuant to the "Administrative Procedure Act," P.L.1968, c.410 (C.52:14B-1 et seq.), rules and regulations establishing a greenhouse gas emissions monitoring and reporting program to monitor and report Statewide greenhouse gas emissions. (GWRA)

Rocky Mountain Institute (RMI) provided rough order of magnitude scenario model baselines to NJBPU based on US Energy Information Administration (EIA) estimates. These baselines are useful to have and can be referenced as to where NJBPU started from as a reference to measure against, but it doesn't provide a model for New Jersey to follow. The Draft EMP was published June 2019, we are now at November 2019. Based off of all of the updates from NJBPU, it is clear New Jersey has at least 2 years to go before preparing a real scenario model that meets the two goals established by EO28 and GWRA.

**It is OK to take some time on the IEP. NJBPU needs to put the transformation program (Energy Master Plan Transformation Program Office) in place and have 1 track designated for developing and designing the modeling of energy mix for attaining the 2 goals established by EO28 and GWRA (IEP Track).** Quite a bit has been accomplished this year, but it is all based off existing energy services (which is NJBPU's mandate) knowledge and doesn't take into consideration of the energy revolution starting around the world. This revolution is continually evolving and why should NJBPU lock into something based off of old technologies and standards when NJBPU could monitor and adapt as the clarity of energy options quickly open up over the next 2 years?

I contacted RMI 2 months ago because they commented on the Draft EMP. I wanted to let them know that their research papers were out of date and they tended to just reissue policies that other states and countries wrote. After looking through the IEP presentation, I discovered that RMI actually subcontracted the work to Evolved Energy Research ([https://www.evolved.energy/about, features, open sourced tool](https://www.evolved.energy/about, features, open_sourced_tool)), which makes it abundantly clear why the scenario models are flawed, not relevant to current evolutions for energy modeling and cannot possibly account for New Jersey meeting the 2 specific goals set by 2050 by EO28 and GWRA.

NJBPU has given 15 days for the public to comment on the IEP starting from Nov 1 and ending on November 15. Such a short comment period on modeling that can threaten to shape NJ next 30 years regarding Energy. This doesn't make sense. RMI provided the webinar video recording availability notice on November 6 at 3:52pm (cteplin@rmi.org). In effect, the public (stakeholders) have 8 days to assess this and provide feedback to NJBPU. For a 30-year program, this is wrong.

Please don't settle on what RMI provided for modeling.

- RMI presentation states that the 6 scenario models were defined by NJBPU June workshop (not open to the public, but selectively invited representatives)
- Models have no input from nor account for the recent energy revolution taking place around the world.
- NJBPU can stipulate it allocates 2 to 4 years on the IEP as a project track of the Energy Master Plan Transformation Program and take the time to arrive at the highest CO2 efficiency integrated energy plan (this is what will produce the least cost and highest efficiency and conversion gain for New Jersey).

I greatly appreciate the work NJBPU has taken on the EMP and for all of its oversight on current energy demand. Please do not write off the future from premature data and analysis simply to issue a Final EMP. This is a substantial long term change for New Jersey and we need to take the time to figure out the best plan that helps New Jersey change.