Steven Miller, Middletown, NJ

Co-Founder Middletown for Clean Energy

Climate Chair of the Sierra Club Shore Group

Climate Reality Project

Comments on the NJ 2019 draft Energy Master Plan 9/15/2019

I call attention to 3 major collections of inputs you ALREADY have received. I recommend the BPU resolve the following issues:

- A consortium of 80 NJ organizations, under "Empower" banner and others, represent 10s of thousands of NJ residents. These organizations have provided numerous written and verbal requests to move NJ to 100% clean energy with increasing speed, and to place a moratorium on new fossil fuel infrastructure. I strongly urge the BPU consider this large collection of inputs
- The "Microgrid Report" (BPU staff, 2016) describes the trends for efficient DER technologies, and advanced microgrids: It states that within a decade:
  "the future energy system will be dramatically different than the systems that have been in place for over one hundred (100) years"
  "Without changing the energy regulatory structure, New Jersey could be trying to pay for a landline infrastructure in a cell phone world."
- 3. The Microgrid Feasibility Studies and reports (13 submitted ~ Dec, 2018). Common themes include: recommendations to remove regulatory barriers, desire to "partner" with the local utility, lack of useful data on infrastructure, and lack of electrical load data. Enormous economic advantages would result from resolution of regulatory barriers. In particular, level 3 microgrids become feasible by easing statutory limits on crossing rights of way.

I have personally contributed to industry standards that enabled three significant industry transformations: In each (ultimately inevitable) transformation, both suppliers and customers benefited from industry standards and mutual cooperation.

The NJ BPU is facing inevitable changes in electrical distribution. A path forward includes:

- An easy step: support the enabling standards: IEEE 1547 "Interconnection and Interoperability of Distributed Energy Resources" (esp 1547.4 "Islanding of DER Microgrids") and the IEEE 2030 Guide for Smart Interoperability
- 2. A much harder step as documented in the Microgrid studies (above): knock down regulatory hurdles!