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October 12, 2018

Aida Camacho, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314, CN 350,
Trenton, New Jersey 08625

Via electronic submission to emp.comments@bpu.nj.gov

GreenFaith is an international, interfaith environmental organization based in New Jersey. Our mission is to educate, equip and organize diverse religious communities for environmental action. We write to you representing faith leaders and communities from across the state.

GreenFaith is a co-founder and executive committee member of Jersey Renews, a coalition of more than 40 labor, environmental, faith and community groups from around New Jersey. We affirm the importance of the comments submitted by Jersey Renews and will not repeat these here. In this letter we will focus on several issues which are of particular significance to our members, some of which go further than the positions taken by Jersey Renews.

We firmly believe that the state's Energy Master Plan (EMP) must address the needs of those in this state who contribute the least to climate change – residents of our cities and the state's environmental justice communities that are overburdened by air pollution and climate threats. The state's Energy Master Plan and policies must provide real, measurable benefits to these communities. For example, we believe that the EMP should call for the installation of at least 500 megawatts of community solar by 2020, with 15% or more of these projects in low to moderate-income communities.

We believe that the Murphy Administration did the right thing by quickly announcing plans to re-join RGGI. Now, the administration faces two important choices about how it implements this re-entry. Firstly, the cornerstone of an effective RGGI program will be the cap that the Murphy administration sets, the level of CO2 emissions allowed in the state. A strong cap will lead to the climate, economic and significant public health benefits. A weak cap undermines RGGI's ability to make a difference and makes it a relative non-event. Research points to an optimal cap of 12 to 13 million tons of emissions for New Jersey in 2020, an achievable goal that maximizes climate, health, job-creation and economic benefits in the state.¹ We urge the state to adopt a cap at the upper end of this range.

1



We urge the state to allocate at least thirty percent of its RGGI revenues to protect environmentally overburdened communities from climate change's impacts, and to position these communities to benefit from RGGI's economic and health impacts. Investments in cooling centers to help children and the elderly cope stay safe during summer heat waves, green infrastructure to absorb more rainwater during severe storms and floods, electric buses for cities and cargo handling equipment at the ports, energy efficiency retrofits and community solar projects to lower energy costs for urban households – these are the kinds of projects that create meaningful benefits for the people who suffer most from climate change though they contributed the least to this problem in the first place. They are absolutely the right way to dedicate a significant portion of RGGI's funds.

We believe that the EMP should call for a robust statewide weatherization, healthy homes and energy efficiency program along with a significant workforce development program. This program should provide funding for apprenticeship programs, training centers, job placement support, and support for companies for hiring training graduates. These programs should target unemployed and underemployed members of our urban communities, drawing on the example of successful programs in Philadelphia, Las Vegas, and other locations around the country.

The EMP should call for the development of financing mechanisms that make renewable energy as accessible to urban households as it is to wealthier suburban homes and businesses. The Board of Public Utilities needs to commit to ensuring that the state's most vulnerable communities enjoy their fair share of energy efficiency services and benefits by supporting outreach through trusted community institutions such as faith and civic groups. These same groups can play an important role in providing an emergency safety network during times of extreme weather and cooling centers during the increasingly frequent heat waves.

By reducing greenhouse gas emissions, the Energy Master Plan needs to reduce air pollution, because air pollution sickens and kills too many people in our urban communities. There is no reason that the state should not commit to measurable reductions in particulate matter, nitrogen oxide, and sulfur oxides in vulnerable communities to help reach compliance with 2016 EPA air quality standards.

Electrification of transportation is another key area in which the EMP should put the state on a course to national leadership. The EMP should guide the state to:

- Dramatically accelerate the installation of electric vehicle infrastructure across our state, through measures such as those in Bills S-2252 and S-2382, prioritizing reducing air pollution and creating jobs in our cities and other areas of the state most heavily affected by air pollution.
- Develop legislation and plans to electrify cargo handling equipment and other sources of air pollution at Ports Newark and Elizabeth.
- Ensure that legislation to promote electric transport includes a focus on electrifying NJ Transit buses and diesel-powered construction equipment used in our cities.
- Ensure that electric vehicle legislation includes state rebates and subsidies- such as Bill 2382 does - to ensure that all New Jersey households have access to electric vehicles.

To pay for these commitments, funding is required. We suggest that the Governor and legislature end all Clean Energy Fund budget raids. These funds, to which all citizens contribute specifically for investment such as the ones that we have described, should be spent as they are intended.

Finally, we believe that the EMP should direct the state to end its support for any further financing or licensing of fossil fuel industry. We call on the state to divest its pension funds from investments in the fossil fuel industry. We strongly oppose the development of any new fossil fuel infrastructure in the state, because such infrastructure is fundamentally

incompatible with the administration's stated goal of 100% renewable energy (RE) by 2050. Currently, the state has plans to license four more natural gas plants in the state. This is not reconcilable with 100% RE by 2050.

We appreciate the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'F. Harper', written in a cursive style.

Rev. Fletcher Harper
Executive Director