



MOVING WATER FORWARD

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October 11, 2018

VIA ELECTRONIC MAIL

The Honorable Aida Camacho-Welch
Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue
Trenton, NJ 08625
EMP.comments@bpu.nj.gov

Re: Comments on Energy Master Plan

I write on behalf of the member companies of the National Association of Water Companies (NAWC) New Jersey chapter in response to the Board of Public Utilities' (BPU) request for comments on the 2019 New Jersey Energy Master Plan (EMP). NAWC-NJ represents private water service companies that serve residential and business customers throughout New Jersey. We represent the consensus views of our member companies. As the BPU conducts its hearings and receives comments on the EMP, we respectfully request your consideration of the following.

Reducing Energy Consumption

As end users of electricity and natural gas, our member companies can make the biggest contribution towards Governor Murphy's goals by reducing energy consumption. Pumping and treating water is energy intensive and we strive for continual improvement of our infrastructure and operations to achieve the highest energy efficiency. We would like to emphasize the importance of energy efficiency in the EMP. It is critical that the EMP recognize that the least expensive and cleanest unit of electricity is that which is not generated in the first place, or as coined by the Rocky Mountain Institute, the "negawatt"; and, the same principle holds for natural gas. Our member companies rely on incentives from electric utilities and the New Jersey Clean Energy Program to make energy efficiency projects financially feasible. Our member companies request that these energy efficiency incentives be maintained and increased as part of the EMP.

Clean and Renewable Power

Our member companies can also contribute to Governor Murphy's goals for a clean and renewable energy future by hosting renewable energy and clean natural gas systems, particularly solar, hydropower and anaerobic digestion which link closely with our operations. We encourage the BPU to consider natural gas part of the clean energy future. Our member companies use natural gas generators in conjunction with electric grid power and biogas to keep energy costs low for customers. These natural gas generators are also an important part of our reliability and resiliency measures in case of an electric grid power outage. As we look to expand renewable energy and clean natural gas systems at our facilities, we encourage the BPU to expand programs that help make these systems more financially feasible.

Clean and Reliable Transportation and Building a Modern Grid

Our member companies would like to be part of Governor Murphy's vision of a modern grid, including energy storage and microgrids. As large energy users, we can host large energy storage batteries and connect the batteries and our distributed generation with other critical infrastructure to create microgrids. We would also like to reduce the carbon footprint of our fleets by transitioning to electric, biogas and CNG/LNG vehicles. Our member companies request that programs that incentivize clean and reliable transportation and building a modern grid be maintained and increased as part of the EMP.

Sustainable and Resilient Infrastructure

Both energy and water infrastructure is critical to sustainability and resiliency. Our member companies rely on safe, reliable and resilient electrical and gas infrastructure to ensure service to their water customers. Our member companies request that DSIC and other water infrastructure programs be continued under the EMP and similar programs be considered for electric and gas utilities. We would also like to emphasize that incentivizing energy efficiency projects, clean and renewable energy systems, clean and reliable transportation and modern grid infrastructure will allow our member companies to make the water infrastructure in New Jersey much more sustainable and resilient.

Conclusion

In conclusion, the National Association of Water Companies New Jersey chapter appreciates the willingness of the Governor, the Board of Public Utilities, and participating State departments to consider our comments as it goes about the difficult task of overhauling the State's Energy Master Plan.

Respectfully,



Jay L. Kooper

Chair

National Association of Water Companies – New Jersey Chapter