



October 11, 2018

Mr. Joseph L. Fiordaliso, President  
The New Jersey Board of Public Utilities  
4 S. Clinton Avenue  
Trenton, NJ 08625

Subject: Stakeholder Comments for Your Consideration

References: The 2019 Energy Master Plan;  
Executive Order No. 28 (May 23, 2018).

Dear President Fiordaliso,

350NJ-Rockland represents residents of New Jersey and, more broadly, all people of the world, all life on the planet, and the planet itself. Our focal point is the cessation of anthropogenic global warming.

We applaud Governor Murphy's commitments to address the energy transition through his "100% Clean Energy by 2050" initiatives, which include both the "Renewable Energy Bill" which has been adopted and signed into law and Executive Order 28 which commissioned the Board of Public Utilities to issue a revised Energy Master Plan in 2019. Initiatives such as these are essential to address the climate change crisis.

We note, however, that the climate situation grows increasingly grave and that urgent and society-wide actions are needed to rein it in.

As reported earlier this week in the New York Times: "A landmark report from the United Nations' scientific panel on climate change paints a far more dire picture of the immediate consequences of climate change than previously thought and says that avoiding the damage requires transforming the world economy at a speed and scale that has "no documented historic precedent," adding that transformation needs to occur "within just a few years."<sup>1</sup> The report, by scientists for the UN's Intergovernmental Panel on Climate Change, is referred to as "Special Report 15" (SR15) and can be viewed at <http://www.ipcc.ch/report/sr15/>.

As important as the energy transition is, though, other factors feed into the human-caused climate change picture. Those factors include: our use of chemical refrigerants; our diets and food production; forest management; building standards; and the availability of mass transit.<sup>2</sup>

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<sup>1</sup> Davenport, Coral, "Major Climate Report Describes a Strong Risk of Crisis as Early as 2040," New York Times, October 7, 2018; <https://www.nytimes.com/2018/10/07/climate/ipcc-climate-report-2040.html> (accessed October 10, 2018).

<sup>2</sup> Hawken, Paul, "DRAWDOWN: The Most Comprehensive Plan Ever Proposed to Reverse Global Warming," Penguin Books, New York; 2017.



Focusing back on energy, we advocate a quicker completion of the overall energy transition, from “100% by 2050” to “100% by 2035,” for all energy uses (e.g., electric power generation, transportation, industrial uses, and residential heating).

That said, we submit the attached comments for your consideration.

We intend to monitor the 2019 EMP process closely and to study the issued draft.

We thank you for your diligence in this crucial matter.

Respectfully,

(signed)

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cc: Ms. Grace Strom Power, Chief of Staff, NJ BPU  
Commissioner Bob Gordon, NJ BPU

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350NJ-R (350NJ-Rockland; officially known as 350NJ) is an autonomous chapter of 350.org. 350.org is building a global climate movement. Its online campaigns, grassroots organizing, and mass public actions are coordinated by a global network active in over 188 countries. The number 350 means climate safety: to preserve a livable planet, scientists tell us we must reduce the amount of CO2 in the atmosphere from its current level over 400 parts per million to below 350 ppm. 350NJ-R implements the vision and campaigns of 350.org in New Jersey and Rockland County NY. For more information, go to 350NJ.org and <https://www.facebook.com/350NJ>.

Attachment to 350NJ-R's Initial Stakeholder Comments  
to the NJ Board of Public Utilities,  
Regarding the "Energy Master Plan 2019,"  
Now Under Development

**As Relates to the Goals of 2019 EMP:**

The goals and objectives of the Energy Master Plan must be clear, explicit, and forceful, to comport with the significance and urgency of the climate change crisis. Language such as "Put on a path to achieve..." seems insubstantial from this perspective. Simply stated: "We shall identify a path to a decarbonized lifestyle and we will make the steps needed to achieve it."

350NJ-R advocates a faster transition to full decarbonization. All activities of decarbonization must be accelerated maximally, over time, so to complete the transition as early as possible - and well before 2050.

Planning must look beyond the operational lives and permit terms of in-State nuclear generating plants (Hope Creek's one unit, licensed to 2026, and Salem's two units, separately licensed to 2036 and 2040) - to the time of their depowering and decommissioning; and must provide for replacement (i.e., renewable) power, as appropriate.

Accelerate the implementation of 2 gigawatts of electrical storage capacity from 1/1/30 to 1/1/24.

Establish interim goals and assign responsibility and accountability for their achievement.

**As Relates to the Policies which 2019 EMP Must Address:**

Update and articulate the definition of "clean energy sources"; exclude nuclear power (and possibly others) from this definition.

Incentivize conservation, consumption reduction, and efficiency among pathways.

External (out-of-State; e.g., PJM Interconnect) sourcing of any electrical energy must be from non-fossil-fueled and non-nuclear generating stations.

Prohibit all new fossil fuel infrastructure built within the State and in our waters - as soon as possible. Assure that federal approvals (e.g., FERC) will not circumvent this prohibition. As appropriate, also cause the cessation of projects which are in-progress.

Formalize a strict prohibition on the extraction of fossil fuels within the jurisdiction of the State.

Shorten the cycles (e.g., to 2 years rather than 3 years for review and 5 years for full updates (rather than 10 years) of the EMP - this, to assure posturing for accelerated transition.

Actively collaborate and cooperate with other entities - states, domestic regions, manufacturers, research institutions, etc. - on broad issues such as transportation and refrigerant management, to maximize the speed of transition.

Explore and establish as policy, incentives, assistance, etc. for residential and community-based solutions as regards conservation, load reduction, efficiency, solar PV, thermal solar, etc.

Establish favorable feed-in credits for residential solar PV systems.

Promote decentralized energy solutions - not only centralized ones.

Establish all necessary policies to facilitate wind generation, both off- and on-shore.

Identify feasible on-shore wind options and implement same.

Stipulate peak load management optimization requirements for commercial and industrial users.

Incentivize thermal solar implementations.

Establish vehicle mpg standards, building construction and energy consumption standards, and other such standards.

Establish equitable, long-term funding streams for all needed education, public information, research, infrastructure, administration, operations, enforcement, and maintenance.

Align NJ finances and investments – e.g., the pension fund – with decarbonization and sustainable energy supplies and systems.

Broader actions within the State are to be established regarding other contributors to anthropogenic climate change, including the management of refrigerants, reduction in food waste, afforestation, restoration of local farm land and practices, and mass transit.

## **As Relates to the Process By Which 2019 EMP will be Developed and Implemented**

The EMP Committee must operate and report with full transparency, high accessibility, and high accountability to all stakeholders.

All proceedings of the Committee must be made readily available to the public, through open-access, Internet-based libraries.

Community involvement and environmental and economic justice – including restorative measures - must be applied throughout the Committee's proceedings and activities.

The credentials and employment - current and historical - of all EMP committee members, engaged experts, consultants, contractors, etc. must be made public.

The Committee shall address all comments on the draft EMP offered by the public and EMP stakeholders in explicit, written fashion. Creditable suggestions and recommendations shall be incorporated in the EMP.

All necessary steps must be taken to ensure long term implementation of the adopted EMP over multiple administrations and legislatures.

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