



**Proposed Comments of the Pinelands Preservation Alliance**  
**Energy Master Plan Hearing**  
September 28, 2018

The new Energy Master Plan should be used to discourage new fossil fuel infrastructure, especially when such new infrastructure is proposed to be built along new paths and in disregard of regional and local environmental protections such as those embodied in the Pinelands Comprehensive Management Plan.

In the Pinelands, we have been fighting two wholly unnecessary natural gas pipelines, one proposed by South Jersey Gas and one by New Jersey Natural Gas. In each case, the rationale given has shifted over the years of controversy but remained unpersuasive. In each case, the utility insisted on routes that cross protected areas of the Pinelands. In each case, the Pinelands Commission, under intense political pressure, twisted regulations that were clearly intended to prevent this kind of infrastructure from crossing these protected areas to get from one side of the Pinelands to the other. And in each case, the utilities and the Board of Public Utilities used the old Energy Master Plan as a crutch for approving the development.

While the intervening years show there is no need for these developments, BPU's standard for approving and making ratepayers pay for these pipelines are so lax and undemanding – and the economic incentives given to the utilities so antiquated – that the companies are still pursuing these projects.

The most pernicious rationale we hear over and over again is the need for “reliability” or “resiliency.” We have seen that these concepts are endlessly abused and applied by government and industry without regard to any rigorous technical analysis and testing in the approval process. Superstorm Sandy is invoked to justify pipelines that such storms do not and could not affect. Real discussion takes place in secret and is never subjected to independent scrutiny. No genuine consideration of alternative approaches is considered, because the decision to build is made first and the analysis shaped after the fact. The human health and safety risks of these developments are consistently disregarded by BPU and other agencies – despite the evidence in the news.

In the case of the two Pinelands pipelines, experts with no financial interest in the outcome have demonstrated that there is no actual need for more capacity in these locations, and that – even if one believed there was – there are alternatives that are cheaper, more effective, less dangerous to the public, and outside the Pinelands conservation zones.

And the hundreds of millions of dollars that the utilities want ratepayers to invest in unneeded natural gas pipelines will inevitably discourage investment in the renewable energy infrastructure we need.

We look to the new Energy Master Plan to set a new course and to make clear that the easy habits and assumptions of the past – habits and assumptions that haven't made sense for many years now – are truly being replaced with a commitment to reduce — not to expand — our dependence on fossil fuel systems in favor of renewable energy systems.

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