



NJ BPU President Joseph Fiordaliso  
New Jersey Board of Public Utilities  
44 South Clinton Avenue  
Trenton, NJ 08625

Dear President Fiordaliso:

September 5, 2018

We want to thank you, the Murphy Administration and the interagency working group that is working to spearhead this process and Governor Murphy for committing to a full revamp of the state Energy Master Plan (EMP) and for committing to 100% clean energy by 2050 as we race to address the climate crisis with action at the state level.

Environment New Jersey, which represents more than 20,000 dues-paying citizen members across the state, has been involved through our organization and sister organizations in EMP planning processes, public comments and hearings for more than 40 years. Most recently, we were actively involved in the 2007-2008 EMP, and were highly critical of the tone and policy recommendations taken by the Christie Administration in the 2011 and 2015 EMP.

We welcome the opportunity to provide public comments at this Clean Power hearing, and the four other hearings that are scheduled for this month, as well as full written comments by October. Note these comments are only intended as a broad brush-strokes on some of the issues we would like to raise and while we won't respond to all of the raised questions, we will expand that in our written comments. We appreciate the public outreach, and we are encouraged the BPU will reconvene a series of public hearings and comment sessions once the plan has been drafted so public input can be meaningful incorporated into the plan and the plan can be revised based on public feedback.

While we appreciate this particular opportunity, we would encourage the BPU to work to hold a series of public stakeholder meetings during evening hours in locations outside of Mercer County, and specifically would recommend locations in evening hearings in Newark and Camden.

We believe the 2019 EMP should be completely rewritten to reflect the Murphy Administration's commitment to fighting global warming and reducing carbon pollution in line with the Paris Climate Accord goals and ultimately meet the goals of the New Jersey Global Warming Response Act, which requires an 80% reduction of carbon emissions in New Jersey by 2050, based on 2006 carbon emission levels.

The Clean and Renewable Power section of the 2019 EMP should include the following:

- Per the 2018 clean energy bill, which was signed into law by Governor Murphy, in May 2018, reflectd the current Renewable Portfolio Standard (RPS) of 50% clean energy by 2030, and 3,500 MW of offshore wind energy by 2030, along with the ultimate goal of 100% clean energy by 2050.

- Return to the spirit of the 2008 EMP, which called for 3,000 MW of offshore wind by 2020, and focus on the economic supply chain opportunities and other benefits of clean energy programs.
- For New Jersey to be a clean energy leader, we need to clearly define the goals of the EMP to be able to produce 100% clean, renewable energy by 2050. California's Legislature just passed landmark legislation to move to 100% clean, renewable energy by 2045. That means we can't consider waste-to-energy as a clean source of power and that means we can't count nuclear as a truly clean source of power. For the purposes of the EMP, we would advocate for the assumption of the full retirement and decommissioning of Salem I & II and Hope Creek in 2036, 2040 and 2044 (Question #1).
- Remove the 2011 EMP and 2015 EMP Update reliance on natural gas and new gas pipelines to meet electricity demand. Remove the embargo of the 2011 EMP and 2015 Update on the use of the words climate change, global warming and lowering carbon emissions. They are not four letter words.
- Implement a full moratorium on any planned fossil fuel infrastructure until the 2019 EMP is finalized. Moving forward, the state should analyze the full carbon life-cycle of all proposed fossil fuel infrastructure expansion, incorporate the independent analysis of the Office of Ratepayer Counsel on actual stated need for additional energy sources (which was eliminated by EDECA of 1999), incorporate the social cost of carbon methodology for any new proposed fossil fuel infrastructure projects (detailed in ENJ RPC comments for the NJBPU OREC rule comments, 7.19.18) and incorporate global warming emissions analysis for any new proposed NJDEP air permits. (Question #5)
- Entirely gut the 2011 EMP and 2015 EMP Update section on offshore wind energy (pages 29-31 in EMP 2015 Update) to reflect the Murphy Administration's recommitment to offshore wind energy.
- Describe in detail how the clean energy elements of nuclear, solar, conservation and storage will work together to achieve the 100% clean energy by 2050 goal. Explain how annual and daily cycles of solar and offshore wind energy complement each other.
- Tout New Jersey's historical, current and future role as a national clean energy leader, and include that as an ongoing goal for 2050.

Thank you for your commitment to developing an EMP that will lead us to a carbon emissions free future in New Jersey by 2050. We look forward to continuing our work with you and your team.

Sincerely,



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