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August 24, 2015

New Jersey Board of Public Utilities
44 S. Clinton Avenue
Trenton, NJ 08625

Re: 2011 Energy Master Plan

To Whom It May Concern:

New Jersey Conservation appreciates the opportunity to comment on the 2011 Energy Master Plan. New Jersey Conservation protects natural areas and farmland through land acquisition and stewardship, promotes strong New Jersey land use policies and forges partnerships to help safeguard clean water and other natural resources.

Since 1960, we've saved more than 130,000 acres of land from sprawl development. Today, we are fighting a new type of sprawl: energy infrastructure. Pipelines, transmission lines and transfer stations now threaten thousands of acres of land. Nowhere is this more apparent than the current rush to build more gas pipelines in New Jersey. The PennEast pipeline alone would cut through 3,300 acres of preserved land, leading to the fragmentation of forests and farms, disturbance to streams and water quality, and industrialization of the landscape.

Our state's energy policy has a great potential to provide solutions that decrease these threats to our ecologically important and sensitive lands, lands that provide critical benefits such as clean drinking water, tourism and recreational opportunities, wildlife habitat and historical, scenic and cultural landscapes.

The 2011 Energy Master Plan (EMP) must be updated. We urge the state to create a new EMP that truly reflects the world we live in today and provides our children and future generations with a clean energy legacy of which we can be proud.

How are we going to accomplish this and address climate change at the same time?

First, by increasing our use of the best type of energy possible, energy conservation and efficiency. The EMP points us in this direction, with its goal of rewarding energy efficiency and conservation and reducing peak demand while driving down energy costs.

We agree with the EMP, as it states:

“The best way to lower individual energy bills and collective energy rates is to use less energy. Reducing energy costs through conservation, energy efficiency, and demand response programs lowers the cost of doing business in the State, enhances economic development, and advances the State’s environmental goals.”

However, we have yet to fully tap into these benefits. In New Jersey, we need to make an absolute priority of implementing energy efficiency and conservation – the EMP can help us do this by increasing energy reduction goals, to, at minimum, 30% by 2030, and more going forward. We already have a mechanism in place to fund clean energy and efficiency programs, the Societal Benefits Charge (SBC). The SBC must be permanently dedicated and not diverted to other uses as it has been for years. Enacting an Energy Efficiency Resource Standard and fully implementing the Combined Heat & Power program are additional obvious steps that New Jersey must take now. These programs represent a true win-win for the economy and the environment.

California’s landmark energy efficiency programs have reduced personal electricity use by 40 percent below the national average and resulted in \$56 billion in household energy savings. By allowing expenditures to be redirected toward other goals and services, energy efficiency helped create 1.5 million jobs with a total payroll of \$45 billion.

According to the National Association of State Utility Consumer Advocates, with or without the Clean Power Plan, states that pursue renewables and energy efficiency will see smaller increases in total electric-system costs through 2030 than they would with any other investment strategy.

Energy efficiency and conservation provide numerous benefits while also saving land and critical natural resources. New Jersey Conservation applauds the EMP’s clear recommendation that preserved farmland and open space remains protected in perpetuity. It is also critical that additional farmland, forests and open space be permanently preserved, and that renewable solar facilities be located appropriately on rooftops, abandoned shopping centers, parking lots, brownfields and landfills that are located near existing infrastructure. The EMP does not support the use of ratepayer subsidies to turn productive farmland into industrial solar facilities. This is excellent policy, and should be expanded to include forests as we should not be using green fields or forests for development, not even renewable energy development given the numerous more appropriate locations available in our state. The importance of preserving more natural carbon sinks such as forests and other greenfields to combat global warming will only increase in the future.

We need to ramp up our Renewable Portfolio Standard (RPS) from 22.5% so that at least 30% of our power comes from renewable sources by 2020. New Jersey can achieve this important goal by investing more in solar and wind, clean technologies that will stimulate our economy, produce jobs and steward our state’s rich natural resources.

Renewables and efficiency are becoming cost competitive with natural gas, and promise to be the low cost energy source in the near future. The Advanced Energy Economy, a consortium of leading businesses, recognizes that solar will continue to grow based on declining costs.

We see a very bright future, one that accomplishes an even more aggressive goal of an 80% RPS by 2050. Our state boasts many excellent colleges and universities - by tapping more extensively into these resources, New Jersey will become a hub of clean energy innovation.

The EMP calls for more capitalization in emerging technologies – one of which is energy storage, a winning solution to capture energy from solar installations. We support more research funding for such energy resiliency technologies. According to GreenTechMedia (<http://www.greentechmedia.com/articles/read/what-advanced-microgrid-solutions-plans-to-do-with-5000-tesla-powerpack-bat>), batteries can store power at night or during peak solar production hours and then discharge it to meet peak needs without burning natural gas and emitting carbon dioxide or other pollutants. Batteries can also be installed in much smaller increments than a single new power plant, and can be located at specific trouble spots on the grid. These advantages could outweigh the current high costs of batteries, which are sure to come down over time.

One example of the importance of keeping solar systems operational in times of grid failure was seen during Hurricane Sandy, when Advanced Solar Products' arrays attached to a diesel generator allowed a Bayonne school to function as an overnight shelter for those without power in their homes.

Finally, New Jersey is missing out on millions of dollars as well as the job creation enjoyed by the other states still enrolled in the Regional Greenhouse Gas Initiative (RGGI). All our residents would benefit if we re-enrolled in that successful program. New Jersey Conservation worked with the legislature when the Global Warming Response Act was drafted to ensure that ten percent of the Initiative's carbon auction proceeds would fund forest stewardship plans and salt marsh restoration for carbon sequestration purposes. The auction proceeds would be a boon for these and other programs that could help create robust and innovative partnerships with the other RGGI states to achieve aggressive energy reduction and decreased greenhouse gas emission goals.

Major clean energy investments are urgently needed in response to global warming and should be made now, instead of further commitments to natural gas and its infrastructure. We will all benefit from these actions. Unfortunately, the EMP's over-reliance on natural gas runs the risk of locking our state into the wrong energy path, with the expansion of natural gas pipelines designed to last for decades, when we need to transition rapidly from fossil fuels to renewables and energy efficiency.

Several new gas pipelines have recently been constructed in central and northern New Jersey and three more are under review by the Federal Energy Regulatory Commission or the New Jersey Board of Public Utilities. These pipelines impose huge costs on our environment and communities, from damage to preserved lands and natural resources, to impacts on landowners, public health and safety.

There is much debate about whether the gas to be carried by these proposed pipelines is needed in New Jersey, or is just the Marcellus tail wagging the energy dog. A recent analysis conducted by Labyrinth Consulting found that the proposed PennEast pipeline alone would result in a 53 percent surplus beyond current demand in Pennsylvania and New Jersey and concluded that the gas is bound for other markets, including export overseas.

The current rush to build multiple new pipelines in New Jersey would likely lead to significant over-building, resulting in supply that far exceeds actual needs, and causing irreparable harm to our communities. Ratepayers and communities would suffer the costs when pipelines become obsolete as the price of renewables decreases even further, and are needed to meet carbon reduction goals to address climate change.

We have been very concerned to learn that pipelines are currently considered in isolation with no single state or federal entity looking at the bigger picture to determine if all this gas is needed, and whether better alternatives exist. This is like letting corporations build toll roads wherever they want without a transportation plan. The BPU could have an important role to play here if it had a mandate and the capacity to develop a comprehensive energy plan for the state.

We are in a new era for energy in New Jersey and nationally. We are at a fork in the road and we need to decide if we are going to head on the more destructive and expensive path that relies on natural gas through a harmful and expanded network of pipelines or if we will become a leader in the transition to this new energy era by fully implementing renewables and efficiency.

The EMP should help us catalyze a rapid transition to a positive future so we can meet the state's energy needs and immediately begin to lower carbon emissions.

Thank you again for the opportunity to weigh in on this very important policy that will have impacts for years to come. Please contact us at [908-234-1225](tel:908-234-1225) with any questions or concerns.

Sincerely,

Tom Gilbert, Campaign Director for Energy, Climate and Natural Resources

Amy Hansen, Policy Analyst