Glen Hoffs Tuesday, August 11, 2015 9:43 AM EMPupdate Energy Master Plan Update

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To Whom It May Concern,

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Glen Hoffs

South Orange, NJ 07079

stephen hirsch Tuesday, August 11, 2015 12:27 Aug EMPupdate Energy Master Plan Update

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stephen hirsch

spring lake, NJ 07762

O. Ruiz Tuesday, August 11, 2015 12:13 AM EMPupdate Energy Master Plan Update

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O. Ruiz

Clinon, NJ 07013

Watson Kush Tuesday, August 11, 2015 8.41, .M EMPupdate Energy Master Plan Update

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Watson Kush pioomfield, NJ 07003

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From: Sent: To: Subject: Betty Quails Tuesday, August 11, 2015 9:48 AM EMPupdate Energy Master Plan Update

To Whom It May Concern,

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**Betty Quails** 

Tinton Falls, NJ 07724

#### Rossi; Michune

From: Sent: To: Subject: Ken Christensen ← **De** Tuesday, August 11, 2015 8:45 AM EMPupdate Energy Master Plan Update

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Ken Christensen

Chester, NJ 07930

From:	Nina Lowe <
Sent:	Tuesday, August 11, 2015 8:23 AM
То:	EMPupdate
Subject:	Energy Master Plan Update

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Nina Lowe Princeton, NJ 08540

Maryjane Genestra Tuesday, August 11, 2015 8:16 AM EMPupdate Energy Master Plan Update

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Maryjane Genestra Cape May Court House, NJ 08210

Jennifer Meares Tuesday, August 11, 2015 4:10 AM EMPupdate Energy Master Plan Update

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Jennifer Meares

Matawan, NJ 07747

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From:	Vera Stillmar
Sent:	Tuesday, August 11, 2015 12:53 AM
То:	EMPupdate
Subject:	Energy Master Plan Update

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Vera Stillman Somerset, NJ 08873

Donna Walters ∢ Tuesday, August 11, 2015 4:07 PM EMPupdate Energy Master Plan Update

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**Donna Walters** 

Tinton Falls, NJ 07724

Phyllis Garr Tuesday, August 11, 2015 5:43 PM EMPupdate Energy Master Plan Update

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Phyllis Garr Marlboro, NJ 07746

Katelyn Hunberg Tuesday, August 11, 2015 6:47 PM EMPupdate Energy Master Plan Update

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Katelyn Hunberg

Park Ridge, NJ 07656

Margaret & Barry Yelenik Tuesday, August 11, 2015 10:39 PM EMPupdate Energy Master Plan Update

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Margaret & Barry Yelenik

Manalapan, NJ 07726



State of New Jersey DIVISION OF RATE COUNSEL 140 East FRONT STREET, 4<sup>th</sup> FL P. O. BOX 003 FRENTON, NEW JERSEY 08625

CHRIS CHRISTIE Governor

KIM GUADAGNO Lt. Governor STEFANIE A. BRAND Director

# Remarks of Stefanie A. Brand Director of the N.J. Division of Rate Counsel Regarding the Energy Master Plan

August 11, 2015, Newark, N.J. August 13, 2015, Trenton, N.J. August 17, 2015, Galloway, N.J.

Good afternoon, my name is Stefanie A. Brand. I am the Director of the Division of Rate Counsel. I would like to thank you for the opportunity to speak today regarding the update to the 2011 Energy Master Plan.

The Division of Rate Counsel represents and protects the interests of all utility consumers - residential customers, small business customers, small and large industrial customers, schools, libraries, and other institutions in our communities. Rate Counsel is a party in cases where New Jersey utilities seek changes in their rates or services. Rate Counsel also gives consumers a voice in setting energy, water and telecommunications policy that will affect the rendering of utility services well into the future.

Our office will be providing comprehensive written comments by the

Tel: (609) 984-1460 • Fax: (609) 292-2923 • Fax: (609) 292-2954 http://www.nj.gov/rpa E-Mail: njratepayer@rpa.state.nj.us August 24, 2015 deadline. We also hope that interested parties will be given an opportunity to comment, even if only in written form, on the actual Update when it is completed. We believe this is required by the governing statute, N.J.S.A. 52:27F-14. Subsection c of that statute requires that the master plan and any revisions thereof be disseminated to the public in an effort "to reach the greatest possible number of citizens of New Jersey," and that the public be given the opportunity to comment on the "overall content of the plan." While we appreciate the opportunity to comment while the Administration is considering what to say in the plan, we do not believe this alleviates the obligation to allow public comment on the Update itself. For one thing, the EMP Updates have traditionally included updated data setting forth how New Jersey has progressed in reaching its goals since the last EMP Update. Since members of the public, including Rate Counsel, do not have access to the same data the State has on our progress, it is difficult for us to comment at the level of detail that would be most helpful to the process. Consistent with the governing statute, we strongly urge the Board to allow written comments from the public on the actual Update once it is finalized and before it is adopted.

Today, my testimony will focus first on some issues discussed in the July 22<sup>nd</sup> Updated Notice of the Energy Master Plan, including the Emerging Issues listed on the second page of that Notice. I will then take the opportunity, as

requested in the Updated Notice, to comment on our progress toward the goals of the last Energy Master Plan which was issued in 2011.

With respect to the Updated Notice, I wanted to discuss briefly some of the numbers that are contained therein. First, the Notice states that New Jersey "has fallen from a high energy cost state to a range that falls within the national average for total energy costs (electricity, natural gas, fuel oil and gasoline)." It is not clear from the Notice how that conclusion was reached and what numbers went into it. We know as of 2013, the U.S. Energy Information Agency ranked New Jersey as tenth in electricity costs, which is certainly higher than average. Since then, the State has approved a number of large programs, such as PSE&G's Energy Strong, and our regional grid operator, PJM, has made changes to its Reliability Pricing Model that everyone believes will raise wholesale capacity prices in the next auction. Also, while New Jersey's ranking is down from where it was a few years ago, its electricity prices have not gone down. Instead, other states have surpassed us with higher prices. Thus, while we should be glad that electricity prices have remained stable in New Jersey, it would be foolish and inaccurate to view our state as one that is no longer subject to high energy costs.

Like other states, we have achieved some reductions in our heating costs due to the drop in natural gas prices. This will hopefully continue as natural gas is being used more and more not only for heating but for electricity generation as

well. If natural gas prices stay low, it will help us continue our stable electricity prices. Likewise, gasoline prices have been lower recently, and, if this continues, it may help stabilize our overall energy costs.

### **Emerging Issues Since 2011**

## Protecting critical energy infrastructure

Since the aftermath of the recent storms like Hurricane Irene and Sandy, all New Jersey ratepayers are concerned about the state of energy utility infrastructure and the level of resiliency and hardening to withstand future weather events. Rate Counsel believes that reliable utility service is a basic fundamental necessity. Without these critical services, customers cannot live in their homes or operate We agree with the EMP goal of protecting critical energy their businesses. infrastructure especially in this modern age when we rely so heavily on electric and gas services. As Rate Counsel, however, I don't agree with spending additional ratepayer money on whatever project is purported to improve the system without sufficient proof that the spending is well thought out, cost effective, and assured to have real impact on the hardening and restoration of services. The utilities should also not be relieved of their obligation to spend the money ratepayers already pay in rates to ensure reliability and safe, adequate and proper service. They should not earn the premium return that comes with alternative rate mechanisms for capital projects that should have been done in the ordinary course of business.

## Improving the Electric Distribution Companies' Emergency Preparedness and Response.

Following Hurricane Irene, the October 2012 snowstorm, and Superstorm Sandy the Board of Public Utilities has taken significant steps to investigate and improve the four regulated electric utility ("EDCs") responses during severe weather. Back in December 2011, after Hurricane Irene, the Board Ordered the EDCs to comply with the Staff recommendations that included immediate action by the EDCs to improve their communications.

While a consultant's further review of the EDC's storm preparedness was ongoing, Superstorm Sandy made landfall in New Jersey on October 29, 2012. On January 23, 2013, the Board accepted the consultant's final report, which contained extensive recommendations touching upon 1) preparedness efforts by the EDCs, 2) communications with customers, government officials and company personnel, 3) restoration response and 4) posting of event reporting. The Board Order was specific with respect to the actions to be taken by the EDCs as well as the timeline in which these actions were to be taken by the companies. A subsequent Order, issued by the Board on March 20, 2013, opened a generic proceeding to support and protect New Jersey utilities' infrastructure by, among other things, inviting all regulated utilities to submit detailed proposals for infrastructure upgrades designed to protect the State's utility infrastructure from future Major Storm Events. Under the umbrella of the Board's infrastructure resiliency and hardening initiatives, the

Board has approved programs including PSE&G's \$1 billion Energy Strong Program, which are currently underway. The work is proceeding, but thankfully, since we have not experienced another statewide major storm, we do not know yet the extent to which the work will be successful in improving our resiliency in the future.

We have had one test of our current level of resiliency, however. Atlantic Electric and PSE&G were tested by the recent storm on June 23, 2015. Atlantic was hardest hit by the June 23<sup>rd</sup> storm, and its response both in light of preparedness and post storm restoration left a lot to be desired. In particular, BPU staff raised concerns regarding field and customer communications by utilities when telephone and wireless communications are also impacted by the storm the utility is responding to. BPU's press release on the utility response to the June 23<sup>rd</sup> Storm commented as follows:

utility sector's reliance wireless The electric on communications is particularly critical in a weather impact outage that causes widespread infrastructure damage and requires a major mutual assistance response. For a period of at least 12 hours after the storm's impact, ACE was unable to use its field mobile data terminals for mobile dispatching of workforce and to communicate fluidly with its field crews and personnel. The utility needed to revert to radios and manual processes to dispatch crews and personnel; collect damage assessment information; and input data into its Outage Management System. This process caused inaccuracy in the outage information contained on ACE's outage webpages and maps. Additionally, mutual assistance crews were initially hampered by the wireless outage.

I think this experience serves as an additional lesson as we proceed in our efforts to improve storm response. Clearly, utilities must keep regulators, as well as the customers and government officials informed about the status of the storm impact and restoration. They must also be able to communicate with field personnel. As we move forward we must find a way to deal with the fact that most telephonic and often wireless communications may be down after severe storms. This is an issue that requires the attention not only of the EDC's, but of the telecommunications and wireless industries as well. No matter how much we harden our electric and gas utility infrastructure and deploy resources, if a reliable communication system doesn't exist then our storm response will suffer.

#### Long term financing through the Energy Resiliency Bank ("ERB")

It is my understanding that the ERB, which is now administered by EDA, has been developing program rules for the first round of funding, in which \$65 million will be made available for resilience projects at water and wastewater treatment plants. As of now, I do not believe any grants have been awarded. It is also my understanding that a second round, providing funds for resiliency projects at other types of facilities, is anticipated. Rate Counsel strongly supports utilizing the ERB money to the greatest extent possible as it reduces the additional amount ratepayers must pay for resiliency programs.

## 2011 Energy Master Plan Goals & Recommendations

Rate Counsel was and remains supportive of the overarching goals contained in the 2011 EMP, including driving down the cost of energy for consumers, promoting a diverse and clean portfolio of generation sources, promoting energy efficiency and peak demand reduction, and supporting increasing use of energy from renewable sources. Rate Counsel believes we have had moderate success in these areas, but that there is always more that we can do. It is not possible in today's comments to cover everything, but I do want to touch on a few subjects.

### <u>Solar</u>

The 2011 Energy Master Plan took a new and welcome direction in the promotion of renewable energy, particularly solar, in noting that while New Jersey had taken great strides in the development of solar energy, the length of those strides, on a forward-going basis, needed to be tempered with some measure of cost-effectiveness that strikes a "sensible balance" [p. 5] with "economic and political realities." [p.4.] The 2011 EMP also emphasized that future renewable energy initiatives and programs needed to be measured against a "rigorous testing of net economic benefits to New Jersey." [p. 3.]

Rate Counsel strongly supports maintaining these goals in the development of the renewable energy component of the 2015 EMP. New Jersey's renewable energy development has come a long way, particularly in the promotion of solar energy, since the state adopted solar-specific generation set-aside in 2004. A great deal of this success has been the result of the financial support provided by New Jersey ratepayers in addition to a number of favorable market outcomes that now makes solar considerably more affordable than was imaginable when the state embarked on setting a leadership path for solar energy almost a decade ago.

This success leads Rate Counsel to recommend that the 2015 EMP continue to move in a direction that removes the training wheels of ratepayer financial support for solar energy and lets the industry be guided by market forces and its own entrepreneurial actions. The 2015 EMP should continue to support New Jersey's current commitments and policies for solar energy, but refrain from adopting any new levels of financial support. Rate Counsel bases this recommendation on two premises.

The first premise is based upon the fact that the financial support for New Jersey's solar industry success rests almost entirely on ratepayers, the majority of whom have not installed solar systems on their homes, businesses, or industries. These ratepayers should not be required to continue to financially support New Jersey's solar industry and continue to insulate it from the risk and challenges associated with operating in competitive energy markets. At some point, the solar industry needs to stand on its own two feet. Rate Counsel recommends that the 2015 EMP start the process of asking the industry to assume more responsibility

for its own development by refraining from the adoption of any new solar energy initiatives, and by continuing to evaluate existing and future programs on the net economic benefits they are anticipated to create for New Jersey ratepayers.

New Jersey ratepayers have made considerable financial commitments, and underwritten a considerable degree of financial risk, on the behalf of solar energy development in the state. These ratepayer financial and contractual commitments are wide-ranging and, through 2014, include:

- The cumulative payment of over \$950 million (in 2014 dollars) in SRECs that have been included in ratepayers' basic electricity service rates.
- Over \$360 million (2014 dollars) in societal benefit charges ("SBC") that supported the Office of Clean Energy's ("OCE") solar installation rebate.
- Another \$480 million (2014 dollars) in SBC payments has provided financial support for other OCE CEP renewable energy programs.
- An estimated \$77 million (2014 dollars) for PSE&G's various solar loan programs that have been approved by the Board over the past six years.
- An estimated \$140 million (2014 dollars) for PSE&G's "Solar 4 All" and "Solar 4 All Extension" programs.
- An estimated \$111 million (2014 dollars) for the various long term solar energy contracting proposals approved by the Board for ACE, JCP&L and RECO.
- And an escalation of the solar Renewable Portfolio Standard ("RPS") that increased the solar RPS requirements for an eight-year period by

an average of almost 60 percent. This increase exposed ratepayers to an estimated potential of \$2.5 billion (NPV) in upfront costs.

The second premise upon which Rate Counsel's recommendations are based is that there is no economic or other market need for any new or additional solar policy initiatives. New Jersey has a very robust and well-recognized solar energy market. Current market data indicates that New Jersey's solar energy markets are attractive to both solar system purchasers, as well as investors. The early years of New Jersey's solar energy industry, where solar installations and SRECs were falling behind the solar RPS, are long gone. SREC markets have been in balance, if not oversupplied, for the past four years. Further, these solar market trends are anticipated to continue into the future. Incremental installations were at an all-time high in February 2015, and have remained strong. These installation trends are more than sufficient for New Jersey to continue to meet future solar RPS requirements. In fact, the Office of Clean Energy ("OCE") anticipates solar capacity to grow another 15 percent in just the next six months, at an average monthly rate of 2.5 percent.

Some in the solar industry may point to the substantial decrease in SREC prices as supporting the need for new solar initiatives when nothing could be further from the truth. First, lower SREC prices are a reflection of the increased SREC supply created by an increase in New Jersey solar installations. The increase in solar installations, in turn, is the result of a considerable decrease in

cost. The Department of Energy reports that system prices of residential commercial photovoltaic systems have declined six to seven percent per year, on average, from 1998 through 2013. Further, these costs fell 12 to 15 percent from 2012 to 2013 alone.

The Solar Energy Industries Association reports that in just one year (2014), installed costs for residential systems fell from \$3.83 per watt to \$3.48 per watt, or over nine percent, and notes that "significant opportunities to reduce costs remain."

These significant solar energy cost decreases have made solar more affordable for average households and businesses. Increased solar affordability reduces the additional financial support that needs to be provided by nonparticipating ratepayers in order to stimulate solar energy development. This is exactly the type of outcome envisioned in the 2011 EMP and one that should continue to be included in the 2015 EMP. Thus, SREC price decreases reflect a successful outcome in the solar industry, not a negative one in search of a new policy initiative or financial subsidy.

### **Energy Efficiency**

With respect to Energy Efficiency ("EE"), we have made some progress, but again further work is required. According to the ACEEE State Energy Efficiency Scorecard, we rank 26<sup>th</sup> in the country when viewing savings as a percentage of retail sales. Based on the consumption goals in the 2011 EMP and the latest 2015

PJM load forecast, it appears that current consumption is close to the EMP target for the current year, but that there will be a growing disparity going forward between the targets and the current forecast. At this rate, the total gap in 2020 will be about 10% of the PJM forecast. That's not good enough. We need to see greater coordination between the OCE and the utility programs, better analysis of how the various programs are working, greater focus on programs for low-income customers, and stepped up building codes and appliance standards.

The 2011 EMP recommended a redesign of the delivery of state energy efficiency programs (pp. 113). The 2011 EMP recognized the value of the local distribution companies delivering energy efficiency and conservation programs, while it called for an evaluation of alternative EE program delivery structures that can "optimize the delivery of effective EE programs to a wide array of customers." (2011 EMP, pp. 119). OCE initiated a process to examine alternative EE program administrator structures in 2010 through 2011 and requested stakeholder comments. However, that process has taken longer than anyone expected. We hope that a single administrator is on board soon, as this will help streamline and coordinate the various EE programs.

As stated in Rate Counsel's previous comments to the Board, a statewide Energy Efficiency Utility structure is something the State may want to consider. It would provide consistency across the state and a single point of contact for EE

programs. Moreover, this entity could be held accountable for achieving defined goals.

If this option is not feasible, it is helpful to allow utilities to provide additional EE programs as long as their programs have no redundancy with NJCEP programs. The utilities offering incentives that supplement the Clean Energy Program (CEP) generally have not demonstrated the extent to which their program offerings lead to savings beyond the level that could be reasonably assumed to result from the CEP programs alone, or that the total level of incentives is appropriate. In addition to not having overlap with CEP, the utilities' programs either 1) should be innovative, for example by employing new methods for program delivery, trying new approaches to overcoming barriers to energy efficiency, or targeting unique market segments, or 2) should offer services that would be administratively or economically difficult for NJCEP to offer.

We have been working with OCE and the utilities to provide better analysis of the effectiveness of the utility programs and develop the information necessary to ensure that they meet these objectives. By and large, the existing utility EE programs merely supplement existing CEP programs and thus are not innovative. Some utilities offer services that CEP cannot, such as on-bill financing, but others do not. The most recent EE Program approvals include provisions that require the utilities to gather more data on the energy savings their programs achieve and the

costs and benefits of the programs generally. With this information, and new streamlined administration of the OCE programs, we hope to improve the state's EE programs and create templates that would allow for more programs and more savings. We strongly recommend that the 2015 EMP update endorse these efforts and provide for more streamlined EE program delivery with more clearly articulated, prescribed roles for NJCEP and utility programs.

Rate Counsel would also like to see more programs and better programs aimed at low-income customers. A recent program evaluation of Comfort Partners conducted by Apprise in December 2014 found that the program failed to achieve expected savings, exhibited weaknesses in the audit and installation procedures, and had a high rate of job inspection failures.<sup>1</sup> Apprise discovered many missed opportunities for installing the most cost-effective measures and concluded that "many of these missed opportunities would not result in greater expenditures, as they would require re-prioritizing or better quality work done" and that "in over 70 percent of the cases where there were missed opportunities, the contractors did not spend up to the seasonal guideline, and could have done a more thorough job."<sup>2</sup>

While low-income programs administered by any entity would face significant barriers and high administrative costs, it is important that the state take this

<sup>&</sup>lt;sup>1</sup> Apprise 2014, page xv and viii.

<sup>&</sup>lt;sup>2</sup> Apprise 2014, page xv.

opportunity to consider whether the current model is the most effective and whether both low-income customers and ratepayers in general might achieve more value from program modifications.

Rate Counsel also urges the Board in the EMP Update to call for updated building codes and appliance standards. New Jersey has not updated its residential and commercial building energy codes for almost five years since September 2010 despite the New Jersey Uniform Construction Code allowing the state to update the codes every three years. A recent study by DOE found that "[e]nergy cost savings for New Jersey resulting from the state updating its commercial and residential building energy codes in accordance with federal law are significant, estimated to be on the order of nearly \$195 million annually by 2030."<sup>3</sup> We recommend that the EMP encourage New Jersey to update its building codes as soon as possible in order to ensure that consumers gain additional economic benefits through substantial energy savings. Similarly, with respect to appliance standards, the 2011 NJCEP states that "the [Board of Public Utilities (BPU)] will cooperate with the Legislature and consider adopting the higher standards as they become available, including the costs and benefits of such changes." (2011 EMP, pp. 118) However, New Jersey has not adopted any new state appliance standards since 2005. Other

<sup>&</sup>lt;sup>3</sup> https://www.energycodes.gov/adoption/states/new-jersey

states have updated their appliance standards more recently and New Jersey should consider doing so as well.

Finally, Rate Counsel has repeatedly recommended that CEP offer its energy savings into PJM's capacity markets. This issue was considered by the Utility Work Group and the Data Work Group. The updated EMP should adopt the advice of the Data Work Group and mandate that the OCE and the utilities bid their energy efficiency capacity into the PJM market. While the PJM rules in this area are currently in a state of flux, the EMP should call on the program administrator and Staff to monitor the PJM rules and maximize the capacity benefit available to offset the cost to ratepayers.

### **Combined Heat and Power**

The 2011 New Jersey Energy Master Plan states that "[t]he Christie Administration is committed to developing 1,500 MW of CHP generation over the next ten years: 1,400 MW of C&I applications and an additional 100 MW from district energy systems." However, it has become clear that the current installation trend for CHP is far from meeting this CHP goal in 2020. The U.S. Department of Energy Combined Heat and Power Installation database<sup>4</sup> shows that 58.7 MW of CHP capacity was installed in 2011, 2012, and 2013 (no later dates are provided in the database), of which 39.8 MW are from C&I. The New Jersey Board of Public

<sup>&</sup>lt;sup>4</sup> https://doe.icfwebservices.com/chpdb/

Utilities provides a database<sup>5</sup> of CHP applications. In 2011, 2012, and 2013, applications totaled 23.5 MW, of which 5.12 MW are from C&I.

Reflecting these low installation rates, the latest Comprehensive Resource Analysis (CRA) draft issued by NJCEP recommended a reduced level of funding for FY16 and a "stakeholder-driven process to review and redesign the CHP program, while considering related factors such as use groups, project economics, payment structures, interconnection, stand-by tariffs, resilience, etc."<sup>6</sup>

The NJCEP proposed recommendations are reasonable given the large difference between actual installed CHP capacity and the EMP's CHP goal. We also recommend that EMP take into account this situation for CHP and consider adjusting its CHP target and developing a process evaluation to identify areas for improvements.

### **Conclusion**

Thank you for the opportunity to testify today. In closing I just want to reiterate the request that the Board allow written comments on the Update once it is completed. These are important issues for our state and greater public comment, including a review of updated data, can only help us better achieve the EMP goals.

Thank you.

<sup>&</sup>lt;sup>5</sup> http://www.njcleanenergy.com/commercial-industrial/programs/combined-heat-power/combined-heat-power

<sup>&</sup>lt;sup>6</sup> Office of Clean Energy. 2015. Comprehensive Resource Analysis – Staff Straw Proposal New Jersey's Clean Energy Program Proposed Funding Levels FY 16, pp. 50, available at http://www.njcleanenergy.com/files/file/Staff%20Straw%20Proposal%20FY2016%20050415.pdf

#### Testimony of Joseph Accardo Deputy General Counsel PSEG Services Corporation

#### New Jersey Draft Energy Master Plan August 11, 2015

Good afternoon. I am Joe Accardo, Deputy General Counsel for PSEG Services Corporation. Thank you for the opportunity to comment on the status of the Goals and Recommendations of the 2011 Energy Master Plan.

PSEG has a long history of partnership with the State, aligning its interests with those of New Jersey. Significantly, we agree with the Board that, although there is certainly more work to be done, New Jersey is making good progress toward achieving its EMP goals — lowering costs to consumers, promoting energy efficiency and energy conservation and supporting renewable energy, particularly on landfills and brownfields thereby maximizing their beneficial use. With respect to the overarching EMP objective of lowering energy costs, since 2009, PSE&G residential gas bills are down 44% because of the lower cost of natural gas supply while electric bills have remained steady throughout this time. We agree with the Board's recommendation to focus on infrastructure investment to improve energy resiliency, emergency preparedness and response. Infrastructure investments that enhance the reliability and resiliency of the electric and gas systems will benefit all customers and create jobs.

PSEG has supported and looks forward to continuing to support the EMP's goals of making energy accessible, reliable, and affordable; maintaining a balanced portfolio of clean generation resources, delivering the economic and environmental benefits of energy efficiency; and supporting new energy technologies and renewable energy investments.

In that context, I would like to focus my remarks on 5 key areas where PSEG continues to advance the EMP's goals by investing in New Jersey:

- Resiliency and infrastructure investment;
- Clean conventional generation;
- Nuclear energy;
- Solar energy; and
- Energy Efficiency.

# **Resiliency and Infrastructure Investment**

PSE&G has already begun to address the need for a more resilient electric and gas network with its Energy Strong Program. In doing so, it will create up to 2,000 jobs to bolster the state's economy. These improvements will reduce methane emissions caused by leaks in older infrastructure, reducing greenhouse gas emissions by an equivalent of 38,000 tons of CO2 a year and will support increased use of natural gas for traditional applications, as well as

emerging technologies, such as residential fuel cells, combined heat and power equipment, and compressed natural gas vehicles.

PSE&G is also pursuing with the Board further efforts to proactively modernize its gas systems to promote a safe, clean and reliable natural gas system well into the future. Cast iron and unprotected steel gas pipes represent less than 30 percent of PSE&G's infrastructure, but they account for more than 80 percent of distribution system's methane gas leaks each year. Our objectives remain to provide our customers and the communities we serve with the environmental benefit of reduced greenhouse gas emissions, and a positive impact on employment and the New Jersey economy.

The EMP should support further efforts to continue resiliency and infrastructure investment progress. In particular, the EMP should recognize the need for regulatory reform that would create a more standardized process for making resiliency investments including the accelerated replacement of old gas mains. Utilities and their customers would benefit from greater predictability on the process and goals in order to more effectively plan out these large infrastructure investments so that they are made in a timely manner, lead to more consistent job creation and are structured in a way that maximizes expenditure efficiencies on behalf of the ratepayers and thereby minimizes rate impacts.

We understand that microgrid investments, in certain applications, may play a complimentary role to protect certain critical facilities. That said, investments that make our existing electric and gas transmission and distribution systems more resilient have and should remain the priority, as they benefit the greatest number of residents in the most cost-effective manner.

# **Clean Conventional Generation**

Regarding generation, following from the publication of the 2011 EMP, it has been made clear that adjustments can be made within

the market system to facilitate investment in clean generation – when and where it is needed and in the most efficient way. New Jersey has seen new clean natural gas generation developed without customer subsidies, and the market continues to ensure reliable supply for New Jersey and the whole PJM footprint. We recommend that references to alternative approaches should be removed from the EMP. Well-functioning competitive power markets remain the best way to ensure reliable supply and foster investment.

Having said this, it is also important to recognize that for New Jersey to achieve its energy goals, the EMP should reflect the importance of not just new generation, but the continuation of an adequate diversified fuel mix and balanced portfolio of generation resources to meet all energy reliability needs of the state.

New Jersey currently has a well balanced portfolio of power resources, including over 4,000 MW of nuclear power, over 7,300

MWs of clean natural gas power plants, almost 2,000 MWs of coal power and approximately 1,700 MWs of renewable resources.

# **Nuclear Energy**

With regard to nuclear energy, New Jersey's nuclear facilities provide about 50% of all the power generated in this State, all without any harmful pollution or carbon emissions.

Nuclear energy is also a source of jobs and economic development in the state, not only at its nuclear facilities, but through the local nuclear supply chain as well. For example, most recently, PSEG is proud to be supporting the State and working with Holtec International to explore small modular reactor design and development.

Earlier this month the details of the federal Clean Power Plan were released, and New Jersey has the lowest CO2 emission target in the PJM region and one of the lowest nationally. Nuclear energy will

be a critical component as the state strives to achieve the objectives set forth in the plan. As you know, in 2011 PSEG Nuclear received NRC approval for 20-year license extensions for Salem and Hope Creek. PSEG is positioned to provide New Jersey with economical and carbon-free electricity from its nuclear plants well into the future.

But the nuclear industry is facing growing challenges from increasing regulatory and safety compliance costs. The EMP needs to strongly support and incent New Jersey's nuclear industry consistent with its support for other emission free resources such as renewable energy.

# **Solar Energy**

With respect to solar energy, PSE&G's Solar 4 All and Solar Loan programs have helped make New Jersey a national leader in the deployment of solar energy. In particular, since the release of the 2011 EMP, we have transitioned our solar energy focus to target landfills and brownfields throughout the PSE&G service territory. This approach has thus far developed 31 MWs of landfill solar energy with almost 53 MWs due to be in service by the end of 2016.

I am pleased to report that landfill solar development has created hundreds of jobs, driven additional economic development and, perhaps most significantly, made productive use of underutilized sites while preserving clean farmland. Moreover, this development has been achieved at roughly 60% of the cost of rooftop solar systems with costs and benefits fairly shared across all ratepayers.

In summary, the 2011 EMP determination that brownfields and landfills are well-suited for the development of large solar generation appears to have been borne out, and the EMP update should continue to support solar on these sites. PSEG looks forward to continuing to contribute to solar energy development

generally as well as in connection with these more complicated parcels of property.

## **Energy Efficiency**

Last, but certainly not least, the 2011 EMP places a strong emphasis on energy efficiency and PSEG has been the leader among utilities in helping the State pursue its EE goals.

PSE&G has played a key role in delivering energy efficiency to hospitals, multifamily housing facilities (particularly for low income customers), small commercial and industrial customers, government buildings, and senior citizen housing. We have received Board approval to invest over \$400 million to successfully assist customers with cost beneficial energy efficiency upgrades that have reduced operating costs, increased competitiveness and helped these businesses retain and add jobs. We would like to collaborate with the Board and other stakeholders to expand upon this role and further help reduce customers' bills, clean the environment and put more money back into New Jersey's economy.

EE is the lowest-cost solution offered in the EMP and will also serve to create jobs and promote economic development. New Jersey should continue to promote the use of EE to meet its energy goals, and utilities can play a critical role in delivering EE. The EMP should seek to expand EE initiatives and align the incentives for utilities to deliver EE to customers.

In particular, more clarity on utilities' role delivering energy efficiency would help all parties. Our utility programs have attempted to evolve along with changing state policy goals; however, the remaining uncertainty around the utility role means that our business only exists on a filing-to-filing basis. This makes

it difficult to plan, staff, and more fully integrate the goal of saving customers energy into the day-to-day business of the utility.

As New Jersey tries to rise up the state rankings for delivering energy efficiency, it is worth noting that of the top 15 states delivering energy efficiency, 13 have their utilities playing a prominent role. Utilities have several advantages to overcome many of the barriers that result in customers' lack of participation in EE programs, including brand recognition, trust of customers, use of our bill and patient capital to invest.

The EMP should support the regulatory changes necessary to provide utilities with the right incentives to aggressively pursue EE, and to remove the disincentives that harm utilities when customers reduce their usage.

In closing, for over 110 years Public Service has succeeded by aligning its business endeavors with the interests of our customers and the State's larger policy goals. We are eager to continue this tradition working together to drive greater efficiency in New Jersey.

Thank you for the opportunity to appear today and to provide these comments.

# Testimony of William P. O'Hearn Public Hearing on New Jersey Energy Master Plan Seton Hall Law School Newark, NJ -- August 11, 2015

Good afternoon. My name is William O'Hearn, and I am a private citizen and Clean Energy Business Advocate who has been following the renewable energy industry for the last 8 years. I appreciate the chance to comment on the energy master plan today.

The recent announcement of the Clean Power Plan by the President and the EPA present an opportunity to take another look at the 2011 EMP and move to a more aggressive approach on promoting renewable energy in the 2015 Plan.

In general, I recommend a return to many of the goals that were featured in the 2008 Energy Master Plan, including the following:

- The state's renewable energy goal should be restored to 30% by 2020, up from the 22.5% by 2021 goal in the current plan.
- New Jersey should rejoin the Regional Greenhouse Gas Initiative, or RGGI, to take advantage of this cap and trade system that would allow us to work with other northeastern states that never left the program.

In addition to these moves, New Jersey should be pushing more aggressively on offshore wind energy like the Fishermen's Energy project off of Atlantic City, and the 2015 Plan should make a commitment to close the last coal-powered plants in New Jersey, as other states have done.

The 2015 should also shift away from the position that natural gas is a clean energy fuel, because this approach will lock us into investments in gas power plants and pipelines for the long term. We are better off putting our public funding into greater incentives for conservation and new technologies like microgrids, community solar, energy storage, and time-of-use pricing, plus the steps outlined below.

#### Steps to Add to the Plan

CONSERVATION.

- Streamline the Clean Energy Program to make our energy conservation and efficiency dollars go farther.
- Develop aggressive incentives for energy audits and retrofits of existing buildings.
- Increase outreach and marketing efforts to encourage the public to conserve energy.

#### TRANSPORTATION.

- Add land use planning policies and practices that strive to minimize auto miles traveled.
- Increase support for mass transit to take more cars off the road.
- Support the introduction of electric cars and solar carports/recharging stations; encourage fleets (postal service, delivery companies, rental cars, taxis, etc.) to go electric.

#### RENEWABLES

- Establish one common set of standards and permits to cut the time wasted on conflicting and confusing local rules and permits for installing solar and other renewable energy.
- Call for the re-establishment of the PACE homeowner solar financing program in New Jersey.
- Phase out coal-generated power in New Jersey by 2025.
- Add solar panels, and small wind if appropriate, to the governor's mansion and state capitol, as other states have already done.
- Note that coal, nuclear and natural gas plants use almost half (more than agriculture) of all the freshwater in the U.S. for cooling, another powerful reason for pursuing clean energy.

In short, the 2015 Energy Master Plan should call for moving away from fossil fuels and investing heavily in renewables and generating local green jobs, or we risk losing our leadership position in the country and missing a huge economic opportunity. Vision, consistency, and certainty are essential for Wall Street and global companies to invest in clean energy in New Jersey, and it has to start with the NJ Energy Master Plan. Thank you.



Environmental Protection Agency

Testimony on the Energy Master Plan Update August 11, 2015

To the Board of Public Utilities:

Thank you for the opportunity to speak today. My name is Mike Proto and I am the Communications Director for the New Jersey chapter of Americans for Prosperity. On behalf of the over 2.5 million AFP activists in all 50 states and the 100,000 activists in the State of New Jersey, I am pleased to have the opportunity to comment on the update to the Energy Master Plan.

American's for Prosperity is committed to safe, affordable and reliable energy across the country and New Jersey is no exception. Access to affordable energy is not only essential to economic growth and jobs in the state of New Jersey but also important to many of those struggling to pay the bills in a tough economy. As such AFP is committed to policies that keep energy affordable rather than raising rates though expensive government mandates.

#### Overview

In 2011 New Jersey released its Energy Master Plan and outlined 5 goals for energy in the state.

- 1. Drive down the costs of energy for all consumers.
- 2. Promote a diverse portfolio of new, clean, in-State generation.
- 3. Reward energy efficiency and energy conservation and reduce peak demand.
- 4. Capitalize on emerging technologies for transportation and power production.

5. Maintain support for the renewable energy portfolio standard of 22.5% of energy from renewable sources by 2021.

While these goals sound positive on paper in reality many of these are unrealistic in assumptions and even contradictory.

## The RPS is unrealistic and expensive.

Around the country states are beginning to face reality when it comes to their renewable portfolio standard. Most zero-emission energy sources, excluding nuclear energy which plays a vital role in New Jersey's energy mix, are intermittent, meaning that they only provide energy when the wind is blowing or the sun is shining. In order to maintain grid reliability wind or solar farms often have to construct coal or natural gas power plants to provide energy during peak hours to ensure grid reliability. This reality combined with the fact that solar and wind

technology is still more expensive than traditional sources leads to higher prices for consumers. Aggregating these costs the Institute for Energy Research found that wind, offshore wind and solar to be almost twice as high as traditional sources in terms of levelized costs, which is a way of understanding the lifetime costs associated with operating a plant. Notably, levelized costs do not take into account capacity factor, or the percentage of time an energy source produces electricity. As such, the gap in costs among traditional sources like natural gas, with a capacity factor of 86 percent, versus solar photovoltaic and onshore, with capacity factors of just 25 percent and 36 percent, respectively, is even greater.

In April of 2015 New Jersey generated 4878 Gigawatt/hours of energy and only 3.3% percent of New Jersey's energy mix came from renewable sources. Increasing from 3.3% to 22.5% would not only drastically increase costs but it would also threaten the reliability of the energy grid as a whole.

## New Jersey Should Stop Subsidizing Expensive and Unreliable Power

The New Jersey tax code is riddled with loopholes and expensive tax credits and the energy area is no exception. Although New Jersey has one of the most expensive solar tax credits in the country, only a fraction of the state's energy generation comes from solar. Despite the low return on investment New Jersey's solar industry, Governor Christie doubled down on the expensive energy sector by passing a bill to prop up solar credits. This alone is expected to increase costs for New Jersey ratepayers by \$300 to \$400 million, a move many simply cannot afford. Similarly county governments have been putting their local taxpayers on the hook by selling bonds to finance expensive solar projects. Predictably when these risky gambles fail to meet their lofty promises taxpayers are left holding the bag. New Jersey's approach to alternative energy should be to let the free-market and innovations drive these technologies forward, not subsidize them at the expense of the taxpayer.

## **Offshore Wind Project**

Americans for Prosperity commends this body for repeatedly rejecting a proposed offshore wind farm off the cost of Atlantic City. The Beacon Hill Institute has documented how this project would be harmful to ratepayers, result in lost jobs and hurt our economy. Further, an independent auditor concluded that the Fishermen's Energy original proposal would result in the most expensive offshore wind power in the world. Likewise, the Board has determined that the project does not meet the net economic benefit test and would be harmful to ratepayers. Offshore wind remains just about the most expensive way to produce electricity on the planet and simply cannot work without significant subsidies.

#### New Jersey Should Reject the Presidents Clean Power Plan.

The EPA has taken unprecedented steps to dictate from Washington how states must generate their energy. Requiring a 32 percent reduction in carbon emissions nationwide and a nearly 50 percent reduction in New Jersey the EPA's clean power plan threatens not only state's rights but also energy affordability and reliability. In order to meet the EPA's new mandate New Jersey would be forced to greatly expand the use both solar and wind in its energy mix as well as force

traditional power generating facilities to install expensive new equipment. This would inevitably raise rates and hurt many New Jerseyans living on fixed incomes. Furthermore the EPA's legal authority to enact this draconian regulation is contentious at best. The legal challenges to the EPA are already in motion and New Jersey should delay submitting a state implementation plan until all the legal questions are resolved.

#### Conclusion

Instead of doubling down on expensive and inefficient policies, New Jersey should look to take its energy sector in a bold new direction. Rather than carve outs to specific industries which foster an environment of cronyism and political favoritism, New Jersey should embrace America's energy revolution to deliver, safe, reliable and affordable energy to all its residents. This means rejecting top down mandates from Washington and Trenton and embracing freemarket policies in the energy sector which will keep costs down and help, provide prosperity for all in the State of New Jersey.

Mike Proto New Jersey Communications Director Americans for Prosperity From: Sent: To: Subject: Harry Robinson Wednesday, August 12, 2015 1:49 AM EMPupdate Energy Master Plan Update

To Whom It May Concern,

I was very disappointed when the Governor, despite his supposed reputation to the contrary, broke his word given in 2009 to be a strong advocate for clean energy, a green economy and environmental responsibility when his administration adopted the 2011 Energy Master Plan.

However, now that the BPU is considering updating that plan, you can correct those mistakes. Please do everything in your power to advance the following policies now and remember even if you're in the minority on the BPU today, your opinion expressed strongly today can help build for a better tomorrow:

\* Accelerate NJ's transition to a safe, clean energy economy using existing technology through aggressive but attainable goals --30% increase in efficiency by 2030 and relying on 100% fossil free energy production by 2050

\* Just say no to the construction and expansion of new oil and gas industries and facilities in NJ

\* Incentivize clean energy technology making the Garden State a hotbed for manufacturing, research and development, installation and maintenance of green technologies to create sustainable jobs

\* Reduce existing equity and environmental justice issues by ensuring vulnerable communities especially benefit as we transition from a dirty to a clean economy.

Harry Robinson

Maplewood, NJ 07040

S.

From:	Sierra Club <information@sierraclub.org> on behalf of Margaret Gilhooley <sierra@sierraclub.org></sierra@sierraclub.org></information@sierraclub.org>
Sent:	Wednesday, August 12, 2015 5:59 PM
То:	EMPupdate
Subject:	Make Clean Energy a Priority for 2015

Aug 12, 2015

**EMP** comments **EMP** Comments

Dear EMP comments Comments,

The Energy Master Plan will help shape New Jersey's energy future in 2015 and beyond. As the president of the Board of Public Utilities you have the power to help make dirty energy a thing of the past. I urge you to make clean energy a priority for the 2015 EMP.

The BPU has the opportunity to ensure that all New Jersey residents have the benefit of clean, safe and affordable energy. Dirty fossil fuels are putting New Jerseyans at risk of disastrous explosions, dire health consequences and dangerous climate impacts. The EMP is your chance to set a safe, 21st century energy strategy New Jersey.

The Board of Public Utilities should establish the following goals for the 2015 EMP:

1.) Eliminate NJ's reliance on coal by retiring PSEG Hudson and Mercer

- 2.) Ensure New Jersey's compliance with the EPA Clean Power Plan
- 3.) Establish binding energy savings targets
- 4.) Stop the expansion of natural gas pipelines throughout the state
- 5.) Stop the transportation of crude oil into and out of New Jersey

The BPU should NOT recognize the Pilgrim Pipeline as a public utility.

The pipeline will bring dirty and explosive oil into our state, and under the ground in our towns. The greatest risk is that an oil leak will contaminate the groundwater that our town and many other towns depend upon. There are substitutes for the Bakken oil, but there is NO substitute for clean drinking water. Our town and the others along the pipeline route feel threatened by this risk.

That oil will be refined in Linden. The BPU should be sure that there will be no increase in air pollution and ozone levels from this process. Some of the refined oil will be transported by pipeline back through our towns to other areas. If the law is changed as some are seeking, oil may also be exported overseas. Thus, our state and towns will bear an added risk to clean up and provide oil for those far away.

There are clean energy alternatives. Wind farms can gather energy from the air. They can be encouraged along the shore. Solar energy and solar panels should be encouraged as an alternative.

Sincerely,

**Margaret Gilhooley** 

Madison, NJ 07940-1014

From: Sent: To: Subject: Caroline Hancock Services Wednesday, August 12, 2015 8:49 PM EMPupdate Energy Master Plan Update

To Whom It May Concern,

I was very disappointed when the Governor, despite his supposed reputation to the contrary, broke his word given in 2009 to be a strong advocate for clean energy, a green economy and environmental responsibility when his administration adopted the 2011 Energy Master Plan.

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\* Reduce existing equity and environmental justice issues by ensuring vulnerable communities especially benefit as we transition from a dirty to a clean economy.

Caroline Hancock

Princeton, NJ 08540

From:Shawn TorbertSent:Wednesday, August 12, 2015 1:08 PMTo:EMPupdateSubject:Request to speak 8/13/2015

Categories:

Blue Category

To whom it may concern,

I would like to speak on how we can reduce NJ's building stock energy usage by 70-90% by using readily available "dumb building" design principles for new construction & retrofits.

Additionally, I'd like to offer the Passive House Standard as an alternate streamlined energy code compliance path to ASHRAE 90.1.

Shawn Torbert, LEED AP, CPHD (Certified Passive House Designer)

Oceanport, NJ resident

Board Member, New York Passive House Co-founder New York Passive House Central Jersey Committee

## SHAWN TORBERT, LEED AP, CPHD, CSI NY METRO SPECIFICATIONS MANAGER | ROXUL INC.

Byhalia, MS, 38611

www.roxul.com

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Mrs. S. Murray

Moorestown, NJ 08057-2755

Aug 12, 2015

Richard Mroz NJ

Subject: Support Clean Energy in the EMP!

Dear Richard Mroz,

The Energy Master Plan will help shape New Jersey's energy future the next few decades. We need to make sure that the EMP includes ways to reduce our dependence on dirty fossil fuels and open doors for clean, renewable energy. New Jersey used to be a leader in solar and wind power and we can be again but we need the EMP to have aggressive clean energy goals.

The BPU needs to acknowledge climate change and the effect of storm events like Hurricane Sandy. Investing in clean energy is one of the best resiliency strategies for New Jersey. We want the new EMP to have less room for pipelines and oil trains and more room for solar and wind development. We need to return to the stricter goals of the 2008 EMP to see New Jersey as a forerunner in clean energy once again.

The BPU has the opportunity to ensure that all New Jersey residents have the benefit of clean, safe and affordable energy. The EMP should have goals of 30% of our energy to come from renewable sources by 2020 and a 30% reduction in energy use through energy efficiency by 2030. All of our electricity to come from renewable sources and we should be 80% carbon free by 2050. We need to install energy efficiency and clean energy goals into the EMP to ensure that New Jersians' health and economy will benefit from clean energy.

Sincerely, Mrs. S. Murray

Mr. Stephen Marshall

Turnersville, NJ 08012-2420

Aug 12, 2015

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Sincerely, Mr. Stephen Marshall

Mr. Kevin Bannon

Sussex, NJ 07461-4858

Aug 12, 2015

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Dear Richard Mroz,

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Sincerely, Mr. Kevin Bannon

Ms. Susan Ludke

Pemberton, NJ 08068-1224

Aug 12, 2015

Richard Mroz NJ

Subject: Support Clean Energy in the EMP!

Dear Richard Mroz,

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Sincerely, Ms. Susan Ludke

Mr David Beck Warren, NJ 07059-5521

Aug 12, 2015

Richard Mroz NJ

Subject: Support Clean Energy in the EMP!

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Sincerely, Mr. David Beck

Mrs. Phvllis Fast

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Gillette, NJ 07933-1345

Aug 12, 2015

Richard Mroz NJ

Subject: Support Clean Energy in the EMP!

Dear Richard Mroz,

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Sincerely, Mrs. Phyllis Fast

Ms. Catherine Hunt Monroe Twp, NJ 08831-5607

Aug 12, 2015

Richard Mroz NJ

Subject: Support Clean Energy in the EMP!

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Sincerely, Ms. Catherine Hunt

Mr. Greg Destro

Clark, NJ 07066-2924

Aug 12, 2015

Richard Mroz NJ

Subject: Support Clean Energy in the EMP!

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Sincerely, Mr. Greg Destro

Mr. James Iozia Highland Lakes, NJ 07422-9106

Aug 12, 2015

Richard Mroz NJ

Subject: Support Clean Energy in the EMP!

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The Energy Master Plan will help shape New Jersey's energy future the next few decades. We need to make sure that the EMP includes ways to reduce our dependence on dirty fossil fuels and open doors for clean, renewable energy. New Jersey used to be a leader in solar and wind power and we can be again but we need the EMP to have aggressive clean energy goals.

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Sincerely, Mr. James Iozia

Ms. Kathy Aprile

Califon, NJ 07830-3509

Aug 12, 2015

Richard Mroz NJ

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Sincerely, Ms. Kathy Aprile

Mr. Chris hazynski

Bordentown, NJ 08505-4242

Aug 12, 2015

Richard Mroz NJ

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Sincerely, Mr. Chris hazynski

Ms. laura dickey

Waldwick, NJ 07463-1204

Aug 12, 2015

Richard Mroz NJ

Subject: Support Clean Energy in the EMP!

Dear Richard Mroz,

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Sincerely, Ms. laura dickey

Mr. Santos Alvarez

Jersey City, NJ 07306-6504

Aug 12, 2015

Richard Mroz NJ

Subject: Support Clean Energy in the EMP!

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Sincerely, Mr. Santos Alvarez

Mr. Michael Arentoft Atlantic Highlands, NJ 07716-2424

Aug 12, 2015

Richard Mroz NJ

Subject: Support Clean Energy in the EMP!

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It is time to put a stop to the destruction of the infrastructure of the state and the health of the people who live here by big energy.

The BPU has the opportunity to ensure that all New Jersey residents have the benefit of clean, safe and affordable energy. The EMP should have goals of 30% of our energy to come from renewable sources by 2020 and a 30% reduction in energy use through energy efficiency by 2030. All of our electricity to come from renewable sources and we should be 80% carbon free by 2050. We need to install energy efficiency and clean energy goals into the EMP to ensure that New Jersians' health and economy will benefit from clean energy.

Sincerely, Mr. Michael Arentoft

Mr. Robert Sala

Belvidere, NJ 07823-2713

Aug 12, 2015

Richard Mroz NJ

Subject: Support Clean Energy in the EMP!

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It is past the time to phase out fossil fuels and combustion as our primary sources of energy. a "smart" energy grid that includes exploitation of clean and sustainable energy sources is a must if there is to be any future for a healthy environment. In addition these technologies would open up vast new avenues of employment and business opportunities.

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Sincerely, Mr. Robert Sala

Ms. Pamela Lazarus

Morris Plains, NJ 07950-2620

Aug 12, 2015

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We need to return to the stricter goals of the 2008 EMP to see New Jersey as a forerunner in clean energy once again. We are way behind where we should be by now!

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Sincerely, Ms. Pamela Lazarus

Mr. qaid muhammad

Jersey City, NJ 07305-3020

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Aug 12, 2015

Richard Mroz NJ

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Gas Is Not Cheap and it is Going Up Again !!!

How You Can Save \$ on Fuel and more.. Receive more mileage for your fuel,3 TO 5 MILES MORE ON GAS OR DESIL FUEL a cleaner engine, a stronger pick-up, and a serious reduction in \*deadly carbon emissions.

Visit the website below to see more details

What can YOU do to help slow down the spread of cancer caused by deadly diesel carbon emissions? The next cancer victim could be you, your child, your parents, friend or co-worker.

The \*World Health Movement declared, deadly carbon emissions DOES cause cancer. Science discovered every third person will get cancer if carbon emmissions are not significantly reduced

Knowing that, we have the power to help prevent the spread of some cancers...

We can start by looking at the sight http://www.healthy.mysyntek.com

Purchase a four ounce bottle of Extreme Fuel, this is one way to bring emissions down. A four ounce bottle of extreme fuel treats 360 gallons of gasoline, diesel, home-heating oil, or liquid propane.

This is a small price to pay to help reduce deadly carbon emissions.

Sincerely, Qaid Muhammad ID #1701B PS If you do not want to purchase on line, you may call in your order: 877 796-8351. Mention my ID #1701B To contact me directly ou don't drive, you may: purchase it as a gift. http://www.healthy.mysyntek.com \* Check out: gasoline/benzine/cancer.com -worldhealthmovement/dieselfuel/cancer.com

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Sincerely, Mr. qaid muhammad

Ms. Dorothy Holtzman

Lakewood, NJ 08701-7950

Aug 12, 2015

Richard Mroz NJ

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Sincerely, Ms. Dorothy Holtzman

Mr. phil vanasse

High Bridge, NJ 08829-2517

Aug 12, 2015

Richard Mroz NJ

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