

[REDACTED]

---

**From:** Holly Reed [REDACTED]  
**Sent:** Tuesday, August 18, 2015 10:57 AM  
**To:** EMPupdate  
**Subject:** EMP Written Comments  
**Attachments:** IEPNJ EMP Comments - Trenton 8-13-15.pdf  
**Categories:** Blue Category

Good Morning,

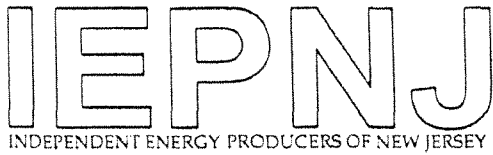
Attached please find written comments on behalf of the Independent Energy Producers of New Jersey. These comments are reflective of my testimony provided at the EMP Public Hearing in Trenton on 8/13.

Please confirm receipt. Have a great day.

Thanks, Holly

Holly Reed  
Vice President  
Gabel Associates  
Energy, Environmental, and Public Utility Consulting

[REDACTED]  
Highland Park, NJ 03904  
[REDACTED]



ADAM KAUFMAN - EXECUTIVE DIRECTOR

**COMMENTS PROVIDED BY HOLLY REED ON BEHALF OF  
THE INDEPENDENT ENERGY PRODUCERS OF NEW JERSEY  
ON THE 2011 ENERGY MASTER PLAN (EMP) UPDATE**

**EMP Public Hearing in Trenton  
August 13, 2015**

My name is Holly Reed, Vice President of Gabel Associates. I am here today to testify on behalf of the Independent Energy Producers of New Jersey – referred to as IEPNJ.

We appreciate the opportunity to present our views and commend you for your efforts and continued work in this area.

IEPNJ is a not-for-profit trade association that represents New Jersey's generators of electric power. IEPNJ members generate over 80% of the electricity produced in the State. Members include companies that sell electricity into the wholesale market for sale to the state's utilities, which, in turn, sell that power to New Jersey homes and businesses.

As such, members of IEPNJ are active participants in the region's wholesale power market and have a continuing interest in assuring that there are adequate supplies of electricity to fuel the region's growth in an environmentally and economically sound manner.

IEPNJ and its members have been on the forefront of the dramatic changes that continue to transform the power business. Since 1992, IEPNJ has been directly involved in shaping the laws and policies that affect New Jersey's power industry and

has been an active contributor to the State's Energy Master Planning process over the years.

We support New Jersey's direction to create a cleaner, more environmentally advanced energy industry throughout the consumption, transportation, and production chain. The power generation industry is a vital component of this chain and generators are committed to continuous improvements in the efficiency, reliability and environmental performance of its plants. In this regard, the one factor I wish to emphasize is that the most efficient way for New Jersey to achieve its goals is to rely on competitive markets and let them work. Competition forces market participants to respond to competitive pressure by improving efficiency which in turn reduces costs and improves environmental quality. New Jersey's generation fleet has evolved and improved significantly over the years through this process. We recommend that you continue your good work in fostering the competitive energy marketplace.

IEPNJ looks forward to continuing to work with New Jersey to promote policies that encourage the responsible development of generation resources needed to meet New Jersey's demand for power. In addition, we are always available to serve as a resource of information as you think through important issues.

Thank you for the opportunity to submit these comments.

**Contact Information:**

Holly Reed, Vice President  
Gabel Associates

[REDACTED]  
Highland Park, NJ 08904

Phone: [REDACTED]

Email: [REDACTED]

[REDACTED]

---

**From:** Robert Fort [REDACTED]  
**Sent:** Tuesday, August 18, 2015 12:04 PM  
**To:** EMPupdate  
**Subject:** Bedminster Industrial Solar Site

**Categories:** Blue Category

NJBPU Board Members:

Please include strong language that prohibits the siting of large solar panel power plants on forestlands, farmlands, wetlands, critical habitat lands and any other environmentally sensitive lands. It is counterproductive to destroy sustainable land in order to sustain the environment; it makes no sense. The KDC Solar proposals in Jackson and Bedminster are just two examples of how to destroy the environment while trying to save it. The Energy Master Plan and all NJBPU rules and regulations should prohibit this.

Thank you,  
Robert Fort  
Bedminster, NJ

Sincerely,  
Robert Fort



**CONFIDENTIAL NOTICE:** This message (together with any attachments thereto) contains information which may be privileged, confidential or exempt or prohibited from disclosure under applicable law. If the sender of this message is not the intended recipient, or the approved or agent responsible for delivering the message to the intended recipient, you should be NOTIFIED that any dissemination, distribution, retention, forwarding or copying of this message, and/or the contents thereof is strictly prohibited. If you have received this message in error or by contrast with the above, please notify the sender immediately by return e-mail.

[REDACTED]

---

**From:** Paul Matinho <[REDACTED]>  
**Sent:** Tuesday, August 18, 2015 12:12 PM  
**To:** EMPupdate  
**Subject:** Proposal to update the NJ energy master plan

**Importance:** High

**Categories:** Blue Category

NJBPU Board Members:

Please include strong language in the new Energy Master Plan that will prohibit the siting of **ALL** (net-metered or grid-supply) photovoltaic solar arrays on forestlands, farmlands, wetlands, critical habitat lands and any other environmentally sensitive lands. It is counterproductive to destroy sustainable land in order to sustain the environment; it makes no sense. The KDC Solar proposals in Jackson, NJ and Bedminster, NJ are just two examples of how to destroy the environment while trying to save it. The Energy Master Plan and all NJBPU rules and regulations should prohibit this.

Thank you,

Paul & Amy Matinho

Bedminster, NJ

[REDACTED]

---

**From:** Chick Cirona <[REDACTED]>  
**Sent:** Tuesday, August 18, 2015 12:27 PM  
**To:** EMPupdate  
**Subject:** Fwd: Proposal to update the NJ energy master plan

**Categories:** Blue Category

NJBPU Board Members:

Please include strong language in the new Energy Master Plan that will prohibit the siting of ALL (net-metered or grid-supply) photovoltaic solar arrays on forestlands, farmlands, wetlands, critical habitat lands and any other environmentally sensitive lands. It is counterproductive to destroy sustainable land in order to sustain the environment; it makes no sense. The KDC Solar proposals in Jackson, NJ and Bedminster, NJ are just two examples of how to destroy the environment while trying to save it. The Energy Master Plan and all NJBPU rules and regulations should prohibit this.

Thank you,

Chick & Joe Cirona  
Bedminster, NJ

[REDACTED]

---

**From:** Zachary Nickerson [REDACTED]  
**Sent:** Tuesday, August 18, 2015 12:48 PM  
**To:** EMPupdate  
**Subject:** EMP comments  
**Attachments:** Nickerson-EMPupdateComments.docx

**Categories:** Blue Category

My comments on the updated Energy Master Plan are attached.

Zachary Nickerson

[REDACTED]

Seaville, NJ 08230



The Energy Master Plan should take the full social and environmental cost of fossil fuels, from extraction to release in the atmosphere, will all of the attendant groundwater contamination, land use degradation, respiratory health impacts, and climate change, into account. A cost-benefit analysis that takes into account the whole picture, including the rapidly falling cost of solar and wind energy technologies, shows that a rapid transition to a clean energy-powered economy is the best available option. The EMP should return to the 2008 target of at least 30% renewable energy by 2021. Recently released federal regulations mean that we will have to increase our share of clean energy in the coming years, and that there are clear advantages, and federal incentives, for early action. NJ used to be second in the nation in installed solar power, but we have lost our momentum and allowed ourselves to fall further behind other states, which has led to job losses in what is one of the fastest growing industries in America. The EMP should strengthen the solar industry by raising targets, strengthening the SREC market, raising net metering caps, and promoting technologies that facilitate grid integration. In addition, as the state at the forefront of Hurricane Sandy, and likely to continue to experience similar impacts due to climate change in the future, the EMP should include upgrades to the latest technologies to improve grid resiliency, integration of distributed energy sources, and energy storage.

I would like to remind BPU that there is a legally-binding target to get 1,100MW of offshore wind power in NJ by 2020. Even if it is no longer possible to meet that target (due in large part to BPU's own actions), you have an obligation to go to the elected representatives who passed that law, and the citizens who voted for them, and present a detailed plan on exactly what you will do to meet that legally-binding target as soon as possible. The EMP is an opportunity to do that, but the current draft misses the mark. The obvious first step would be to approve Fishermen's Energy's proposed 25MW demonstration project. Of all the places in NJ that could use a new industry to diversify their economy right now, Atlantic City is at the top of the list. NJ is the perfect staging ground for this new American industry, due to our relatively shallow outer continental shelf. We have already lost the opportunity to be the first to Rhode Island; we should not squander the opportunity to make Fishermen's Energy the second offshore wind farm in America, and to use it as a first step towards becoming a regional hub of new economic activity. If BPU cannot even approve the first 25MW, how do you expect to reach the legally-binding target of 1,100MW?

Zachary Nickerson

  
Seaville, NJ 08230

[REDACTED]

---

**From:** Steve Frantz - [REDACTED]  
**Sent:** Tuesday, August 18, 2015 1:20 PM  
**To:** EMPupdate  
**Subject:** Proposal to update the NJ energy master plan  
**Categories:** Blue Category

NJBPU Board Members:

Please include strong language in the new Energy Master Plan that will prohibit the siting of **ALL** (net-metered or grid-supply) photovoltaic solar arrays on forestlands, farmlands, wetlands, critical habitat lands and any other environmentally sensitive lands. It is counterproductive to destroy sustainable land in order to sustain the environment; it makes no sense. The KDC Solar proposals in Jackson, NJ and Bedminster, NJ are just two examples of how to destroy the environment while trying to save it. The Energy Master Plan and all NJBPU rules and regulations should prohibit this.

Thank you,

Steve and Laura Frantz

Bedminster, NJ

[REDACTED]

---

**From:** Anthony [REDACTED]  
**Sent:** Tuesday, August 18, 2015 2:11 PM  
**To:** EMPupdate  
**Subject:** Renewable energy

**Categories:** Blue Category

Public Comment:

We need more renewable energy and you need to stop blocking Fisherman's Energy from building the wind farm. They are going ahead with the Block Island farm in Rhode Island. Your argument against it is ridiculous. You are just being paid by the fossil fuel industry. Start representing the people.

Anthony Cekada  
Sent from my iPhone

[REDACTED]

---

**From:** Kellner Linda <[REDACTED]>  
**Sent:** Tuesday, August 18, 2015 2:24 PM  
**To:** EMPupdate  
**Subject:** EMP Update - NJNG Comments to the 2011 EMP  
**Attachments:** 8-18-15 NJNG EMP Comments.pdf

**Categories:** Blue Category

Dear Secretary Asbury,

Pursuant to the July 22, 2015, Energy Master Plan (EMP) Update Notice, New Jersey Natural Gas (NJNG) is hereby submitting its written comments. Hard copies of our comments are also being sent to the Board today via U.S. mail. NJNG appreciates the opportunity to be a part of the EMP update process.

With many thanks,

Linda Kellner  
Chief of Staff  
[REDACTED]



August 18, 2015

The Honorable Richard Mroz, President  
New Jersey Board of Public Utilities  
44 South Clinton Avenue  
Post Office Box 350  
Trenton, New Jersey 08625-0350

***Re: New Jersey Natural Gas, Comments on the 2011 Energy Master Plan***

Dear President Mroz:

New Jersey Natural Gas (NJNG) is pleased to offer comments on the 2011 Energy Master Plan (EMP). Through the EMP, New Jersey has charted a course for our energy future. It is one that is deeply rooted in the tenets of sustainability – social responsibility, economic prosperity and environmental stewardship – and will effectively meet the needs of New Jersey residents and businesses.

As a lifeline service provider, NJNG is guided by these very principles. The focus of our comments is on the elements of the EMP that will allow NJNG to help ensure the delivery and efficient use of safe, abundant, low-cost, and reliable natural gas.

***Support the Development of Natural Gas Infrastructure***

NJNG's extensive transmission and distribution pipeline system keeps our customers' homes warm and businesses running. And, the reliability of that system is critical to meeting their needs every day. As such, we have always been, and remain committed to investing the necessary capital to ensure the safety, reliability and resiliency of our system. Every year, we invest tens of millions of dollars in our infrastructure. In addition to these ongoing investments, the unprecedented and devastating impact of Superstorm Sandy on New Jersey's utility infrastructure necessarily resulted in an increased emphasis on system resiliency and infrastructure investment. As a result and in partnership with the New Jersey Board of Public Utilities (BPU), NJNG has undertaken projects directly aimed at improving reliability and building a more resilient system to better protect our customers from supply disruptions, whether from natural or manmade events and disasters.

In pursuit of a significant 2011 EMP goal, New Jersey has made great strides in moving from coal to natural gas-fired generation. In fact, in a recent PJM Interconnection analysis, New Jersey was noted as having the lowest emissions rate within the power grid. Given the continuing low cost and abundance of domestic natural gas (it is estimated that the future supply of natural gas is enough to meet the country's energy needs of more than 100 years) there has never been a better

August 18, 2015

Page 2

opportunity to invest in the necessary infrastructure to serve electric generation plants, without overburdening customers.

In the long run, these investments can create jobs, lower energy costs and improve the overall quality of life for New Jersey residents and businesses. These investments can also significantly move New Jersey toward compliance with the aggressive goals set in the U.S. Environmental Protection Agency's recent Clean Power Plan. NJNG, therefore, respectfully requests that the updated EMP continues to support investment in natural gas infrastructure development.

#### *Advance Supply Diversity*

Reducing New Jersey's reliance on petroleum-based foreign fuels is a crucial step toward ensuring safety, reliability, and predictability, and can be accomplished through a portfolio approach. The use of renewable resources will help us meet our energy needs, while offsetting peak demand across the grid and lowering fossil fuel emissions. Additionally, the use of natural gas for electric generation, as previously mentioned, provides a clean source of reliable, competitively priced power that can be supplemented with renewable generation.

New and evolving distributed generation, including combined heat and power (CHP) units and fuel cells, reduce the need for expensive investment to meet peak demand, improve grid reliability, lower emissions and stimulate economic growth. Further, in the wake of Superstorm Sandy, such technologies clearly demonstrated their role in ensuring more resilient energy infrastructure. While the value proposition for CHP may have expanded since Superstorm Sandy, the initial cost of this and other technologies continues to present a barrier to investment. As a result, it is our opinion that the continuation of certain properly established incentives is essential to encourage further adoption of these technologies. Also, because of the long lead time associated with these projects and the need for greater certainty in the marketplace to spur action, we recommend consideration of funding on a rolling-year basis.

NJNG also believes there is additional opportunity for New Jersey to take a lead role in the advancement of these technologies by working with the utilities to identify the tools and resources necessary for the inclusion of distributed energy in their integrated resource planning.

In addition, as the importance of supply diversity was recognized in the 2011 EMP, and given the long-term cost advantages of natural gas as a clean, abundant fuel source, NJNG urges continued support for oil-to-gas conversions in the updated EMP. Fuel oil customers who convert to natural gas heating systems help to reduce the consumption of petroleum-based fuels in the region, lower their energy bills by utilizing cleaner burning, cheaper priced natural gas, and eliminate the risk of potential soil and/or groundwater contamination associated with their oil storage tank. To help facilitate customer investment and advance conversions, we respectfully request that the State encourage utility conversion program offerings.

#### *Grow Energy Efficiency through Utility Engagement*

When implemented thoughtfully and effectively, energy efficiency is an important tool for reducing energy costs. Equally important, energy efficiency fosters economic development and helps reduce greenhouse gas emissions. To make wise energy decisions that have long-term benefits, customers need reliable information about energy efficiency opportunities and options. Utilities can and should play a role in the advancement of energy efficiency, leveraging their ongoing relationship and frequent communication with customers.

We are recognized and trusted partners in the communities we serve. For example, NJNG has been offering BPU-approved energy-efficiency programs through our SAVEGREEN Project (SAVEGREEN) since 2009. We have been able to maximize the benefits of customers' energy efficiency investments by offering programs that complement and enhance those available through the state's Clean Energy Program (NJCEP). Through SAVEGREEN, NJNG has hired 29 full-time employees and grown the number of contractors participating in our program from 100 to more than 2,200 over the last six years. Since its inception, SAVEGREEN has generated nearly \$285 million of economic activity in the state.

Results like this would not be possible without the proper regulatory framework that our BPU-approved Conservation Incentive Program (CIP) established. In fact, since 2006, NJNG has helped customers reduce their natural gas usage by more than 315 million therms – saving approximately \$322 million and preventing the release of nearly 3.7 billion pounds of CO<sub>2</sub> into the atmosphere. To put that into perspective, this is equivalent to the annual energy use of more than 152,000 homes, planting nearly 1.4 million acres of trees or removing over 351,000 cars from New Jersey's roadways each year.

NJNG's experience is consistent with the general findings of the American Council for an Energy Efficient Economy's (ACEEE) annual nationwide review of successful energy-efficiency programs. The 2014 ACEEE report shows that 39 states have structures in place to engage utilities as partners in addressing the inherent disincentive from traditional ratemaking. Today, it is more the norm than the exception. By supporting efforts to address the throughput incentive, the EMP can offer an opportunity to engage the utilities as strong advocates in meeting energy-efficiency goals.

NJNG is active in the State and Local Energy Efficiency Action Network, which has a robust collection of resources, discussion forums, and free technical assistance that can assist the State in considering the benefits and implications of policy and program approaches that can help advance energy efficiency in New Jersey.

#### ***Showcase Alternative Fuel Vehicles and Other Innovative and/or Emerging Technologies***

As with generation sources, transportation needs can also be met through a portfolio approach, comprised of a diverse fuel mix. Taking advantage of various fuel sources for differing transportation needs will lessen the State's dependence on petroleum-based foreign fuels and help reduce our carbon footprint. NJNG has transitioned more than 245 fleet vehicles to compressed natural gas, hybrid, electric and bio-fuel and we continue our efforts to replace additional vehicles with alternative fuel vehicles (AFVs) as appropriate.

New Jersey could considerably increase the emphasis on and, potentially, expand market acceptance and demand for AFVs if it were to convert the State's fleet and/or purchase AFVs as current fleet vehicles are retired. NJNG's efforts to date have reduced our fleet emissions by 22 percent. Just imagine the impact a State fleet of AFVs could have. Also, similar to other innovative and emerging technologies, the AFV market would benefit from an incentive that helps offset the incremental cost of the vehicle purchase until AFVs gain greater market penetration.

As recognized in the 2011 EMP, the State should continue to facilitate the infrastructure needed to support AFVs. NJNG appreciates the BPU's partnership in our compressed natural gas (CNG)

August 18, 2015

Page 4

refueling infrastructure program. As a result of this program, three host companies are able to accelerate their purchases of natural gas vehicles, facilitating the removal of older, more polluting diesel or gasoline vehicles from their fleets. Further, these CNG refueling stations are open to other fleet operators and the general public, with the intent of expanding access and fueling options.

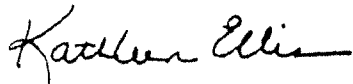
New technologies are constantly emerging and present New Jersey with an opportunity to be at the forefront, using state facilities as incubators for technology investment, including fuel cells, battery storage, micro-grids, etc. We would encourage the State to continue its support for innovation and to be open to collaborative opportunities with energy technology companies.

*Conclusion*

I'll conclude where I began, the tenets of the EMP are sound and sustaining. NJNG's comments are provided to simply offer some observations and ideas, whether in programming, policy or initiatives, regarding the role natural gas can play in achieving the EMP goals and ensuring the high quality of life we enjoy in New Jersey.

NJNG appreciates being a part of the process and looks forward to working with the BPU, Rate Counsel and other stakeholders in the development and implementation of a new EMP.

Sincerely,



Kathleen T. Ellis  
Chief Operating Officer

CC: Commissioner Upendra Chivukula  
Commissioner Joseph Fiordaliso  
Commissioner Mary-Anna Holden  
Commissioner Dianne Solomon  
Secretary Irene Kim Asbury