



LEAGUE OF WOMEN VOTERS®  
OF NEW JERSEY

EMP Committee  
Irene Kim Asbury, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Trenton, New Jersey 08625-0350

December 2, 2015

Re: 2015 Energy Master Plan Update

Dear Committee Members:

The League of Women Voters of New Jersey is guided by a principle of active and informed participation by citizens in government. We are a nonpartisan political organization, not an environmental organization, and our comments directly address the impact of the updated 2015 Energy Master Plan (EMP) on the residents of New Jersey.

We believe that all efforts should be made to ensure citizen participation and promote a fair, transparent and open public process. The initial hearings, held in August with little notice, were not in the best interest of good government, and neither is this brief comment period conducted during the holidays. We had previously requested you make a commitment to robust public participation and allow adequate time and notice for testimony and comments for the updated EMP. We continue to be disappointed in the lack of opportunity for significant public testimony.

With the damaging effects of Super Storm Sandy still evident in many parts of our coastal state, we cannot pretend our electric power distribution system is adequate for dealing with future weather events. Increased warming and resulting sea level rise - already being observed in the amount and frequency of nuisance flooding - guarantee that similar and even more severe storms lie ahead. The public deserves more resilient planning. Power outages of up to 12 days in widespread areas of our state - that can be caused by even 'ordinary' storms - are unacceptable.

We are encouraged that the updated EMP has focused on making the state's energy grid more resilient. Using federal funding to invest in "micro-grids" that can operate after a storm is a start - it is pragmatic and cost-effective. However, a plan that doesn't even mention climate change and global warming is inadequate. It is only geared to addressing crises, not planning to prevent them. The word "sustainable" rather than "cost-effective" should have been the most repeated word in the updated EMP. Where is the longer view in this plan?

The League of Women Voters is well aware that no source of energy exists without some costs - it takes energy to create energy. But this plan again fails to educate policy makers, legislators and the public about energy from a comprehensive, "cradle to grave" perspective that would no longer undervalue renewables and overvalue fossil-fuel energy. Including the costs of historic subsidies and

of damage to health and the environment would lead to a more accurate assessment than a simplistic analysis that only looks in the short-term at direct costs.

When we testified four years ago, the League noted that the goals in the 2011 EMP represented a step backwards from the ambitious goals in the 2008 plan which stated: “New Jersey is faced with an opportunity to transform its current energy system from one whose flaws threaten to undermine the security of our economy, to one that is responsible, efficient, clean, affordable and reliable” (2008 EMP, p. 101). These goals are still missing in the 2015 update.

The State's goal is not just to reduce costs. It should encourage residents to reduce energy consumption, to encourage conservation and greater efficiency, and to support renewable sources of energy. Measures such as smart grids, smart metering, energy efficient appliances, and ongoing public education and outreach are integral to the plan's success. Despite this, more than \$1 billion was cut from New Jersey's Clean Energy Fund over the past six years and that money was instead used to plug deficits in the annual state budget. In 2011, when New Jersey was removed from the Regional Green House Gas Initiative, we forfeited the opportunity to earn over \$200 million in the sale of CO2 allowances. According to the American Council for an Energy-Efficient Economy<sup>1</sup>, this cost our residents and businesses money that could have been used to develop clean energy technology and retrofit homes and businesses to make them less costly to heat and cool.

New Jersey was an example for other coastal states in the Northeast when the 2008 EMP proposed the aggressive development of solar and offshore wind power - sustainable energy produced exclusively from within the state. But today, of the fifteen percent of the state's electricity generated by renewable energy, only four percent is produced in New Jersey. And now the 2015 EMP has dismissed wind entirely, concluding that it is “not economically viable at this time.” We disagree. The goal of generating 1,100 megawatts of offshore wind capacity along our coast is still worthy of our efforts. There have been great improvements in battery storage since 2008 that have removed many of the intermittency problems raised by critics of renewable energy sources. New Jersey may no longer lead, but we could be following the innovators like Rhode Island, which has broken ground on the Northeast's first offshore wind project, and New York, which will be mandating – through regulations, not just plans - that 50% of the state's power come from renewables by 2030.

Eighty percent of residents now say that New Jersey should invest more in renewable energy, according to a recent survey by Fairleigh Dickinson's Public Mind. Public attitudes may have changed since 2011, but the updated EMP hasn't. It still aims to have 22.5 percent of its electricity come from renewable energy by 2021 – rejecting once more the 30% goal of the 2008 plan. The 2015 plan leaves to others, like the sponsors of S-2444, the work of developing a program of sustainable, renewable energy choices that will benefit future generations. The goal of the New Jersey Global Warming Response Act of 2007 – to achieve 80% of our energy from renewable sources by the year 2050 – has been abandoned in the updated EMP.

As the US market for coal and nuclear energy contracts, renewables will become a hedge against future market dominance by natural gas. We need to be investing more in renewables for when the price of gas goes back up. Instead, the state is intensifying its reliance on natural gas. The League of Women Voters recognizes that all energy comes with costs, and that no form of energy is free from risk. But

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<sup>1</sup> <http://www.njspotlight.com/stories/15/10/26/nj-continues-to-fall-behind-other-states-in-energy-efficiency-efforts-report-says/>

the Board has an obligation to protect our residents from possible contamination of their water, land and air. The updated EMP, like the 2011 plan, emphasizes the benefits of natural gas but does not discuss its consequences: the dangers of extracting gas from underground shale deposits, the consumptive use of water, the difficulty of disposing of waste from fracking operations, and the risks to the public health and the environment when natural gas is transported by rail, barge and pipelines. Once again, we ask for a moratorium on hydrofracking in the Delaware Basin until rigorous, unbiased scientific studies are completed. This is no time to be calling for “cost effective” solutions while ignoring the long-term hazards inherent to every stage of natural gas production and use.

The League of Women Voters of New Jersey agrees that there are “...vexing economic, safety, and environmental problems” regarding the use of nuclear energy (EMP-2011 p. 84). Our investigations have shown, however, that problems with nuclear energy are so inherently dangerous, profoundly intractable and extremely costly, especially as regards nuclear waste, that the League’s official policy position opposes on-going support for nuclear fission.

This plan ignores the consequences that it will bring. As we’ve pointed out before, this administration will be a distant memory in 20 years’ time and the residents of this state deserve to know their future is not at risk because of myopic choices to save money in the short term.

Sincerely,

A handwritten signature in black ink that reads "Nancy K. Hedinger". The signature is written in a cursive style with a large, prominent initial "N".

Nancy Hedinger  
President  
League of Women Voters of New Jersey  
204 West State Street  
Trenton, New Jersey 08608