

**Beth Robinson  
Ocean, NJ**

New Jersey Board of Public Utilities  
Office of Policy and Planning  
Attention: Draft EMP Comments  
Two Gateway Center  
Newark, NJ 07102

Dear BPU,

**“The evolution of the energy sector is determined by the interaction of technology, policy, and markets. The regulatory and legislative policies adopted have a major influence on how the market environment for distributed generation will evolve, and therefore, on the behavior of private market players. (A. Lovins, Small Is Profitable)”**

These comments are in response to the tenants proposed in the Draft Energy Master Plan. As an environmentally aware person, I am sickened by the fact that New Jersey currently does not have a higher percentage of energy generated from renewable sources. The EMP still proposes a nuclear reactor as a solution – which is completely unacceptable! As I read thru this plan I find it more and more difficult to see a clear picture as to where private enterprise fits in helping the State reach its proposed 2020 renewable energy target.

I am interested in building *small* renewable energy substations in communities throughout the State. Under the current plan, there is little to no place for private enterprise to generate renewable energy and the sad state of affairs is that the utility companies have not been allowed to do so either. In this draft, while generation is possible it will take time for the utilities (except PSE&G) to change their strategy when we have no time to wait. There is no clear delineation that private enterprise can do so either unless we are in support of a municipality, homeowner or retail business with a flat roof and land – or unless we have a vessel carrying consumption load; there is no clear path to renewable generation for the environments sake.

My premise is that the need for generating more renewable energy – as oppose to relying on fossil fuel energy - is the load incentive. Private enterprise should be able to develop properties to generate renewable energy for the sake of generating renewable energy and providing more energy to the grid – but it is not clear in the EMP.

In Amory Lovins book “Small is Profitable” he states in the Executive Summary: “The electricity industry is in the midst of profound and comprehensive change, including a return to the local and neighborhood scale in which the industry’s early history is rooted.” I am confused with the use of the terminology and the rational for why we are using it; such as why we are using the term “community” wind, solar, biomass when the concept of providing energy for the community has been around for eons? We seem to need something to hang our hats on like “community solar” and make a big deal of it by making adding a novel twist or add specific definitions that lead to limiting all possibilities. Meanwhile we fail to recognize that electrical substations are

all over the state, on small parcels of land and we never called them *community fossil fuel generation stations!* What's the big deal now?

Private enterprise or renewable energy developers should be allowed to do the same thing the utilities have done – which is to develop small parcels of land for renewable energy generation in front or behind the meter without specific connotations or limits. While recognizing that more parcels may be located in communities near the generation spot! The purpose for small community generation is to distribute the energy to the community as close to the source as possible; it is not to impose strict limitations that would prohibit community development. So, BPU please explain why must a return to concepts of the past - such as neighborhood scale generation - be so stringently delineated and limited in the EMP?

### **Jersey Fresh – Home Grown Energy**

If we could only embrace the concept of Home Grown Renewable Energy like we do Jersey Fresh produce it would be greatly, greatly appreciated! Just picture this - wind turbines operating in the distance as we walk thru a Jersey Fresh corn field at harvest!

**“We have not made specific recommendations for the private sector, because each company has unique strategic objectives, market conditions, and organizational capabilities. Instead, we provide *implications* for the private sector: for investor-owned utilities, public power utilities, financial markets, commercial and industrial customers, and real estate developers.” (A. Lovins, SIP)**

Please feel our pain!! Net metering, PJM, FERC, etc. What does all this mean and who goes where? The operant word in that passage is “implications”. As a private enterprise interested in developing community renewable energy I am daunted by the process. How could the State have made this process more convoluted and harder than necessary? Let the private sector join the ranks of the utilities and get serious about generating renewable energy – what would be the harm? Could it be that we could possibly make our renewable energy targets earlier - like in 2015! What about having a sub-utility or micro-utility business category for serious developers? As noted above by Lovins, there are implications in the plan – and no specific recommendation – by design I trust; by default we falter. Please make a clear distinction in the EMP as to where the private sector has opportunities to be partners in developing, generating renewable energy for the State and forego the implications.

### **Rational Radicalism**

It is extremely disheartening in this day and age of technology to see references to building nuclear reactors to help fill the gap in energy production. We are in a budget crunch and on the verge of an energy crises and NJ State is still considering a major financial burden to the State, long lead time to generation and possible long term environmental effects; and this is a viable solution to BPU??

My proposal is that we consider actively promoting and provide funding for homeowners, businesses, villages and towns to go “off-grid”. The meaning of off-grid, allows for each entity (home, business, town or village) to stand alone for their electricity needs by using alternative energy systems to generate energy. Off-grid alternative energy systems will lessen the electrical

burden off the Eastern Electric Grid for all parties involved. The long term effects of these systems are better for the environment, the community and the state. We appreciate the need of the state to make amends in the Draft EMP for the impending energy demands; but there is another component that needs to be explored and which is that many citizens of the state may be more interested and willing to take responsibility for their individual generation and consumption of electricity.

The benefit of each off-grid alternative energy system (using wind, solar, geothermal micro-hydro technologies) is that they are tailored to the individual site's energy needs as are the costs of the system. Also, there is a greater advantage in that the excess energy produced can be stored in batteries for future use and the site is not dependent on the SREC/REC maze currently in use of people using alternative energy systems and selling their excess energy. Collectively, all parties off-grid lend greater support to environment and the economy.

This proposal may be a radical departure from what is currently being proposed, however it is more rational to slow down, take a more individual approach to generating energy and review it's uses on many levels instead of adding insult to injury with a nuclear reactor or entrusting that the utilities that are currently not generating renewable energy to get up and running in short order. Private enterprise must be allowed clear ports of entry into the EMP to bring new ideas, jobs and to help build the renewable energy portfolio that NJ should have.

Alternative energy (wind, solar, biomass, geothermal, hydro, etc.) solutions can provide a more cost effect means for generating energy with shorter lead times and constructions. Our tax dollars are better spent in this direction. Let the private sector in...

Sincerely,  
Beth Robinson

**Deadline for comments:** Friday, July 25, 2008.

Written comments may be submitted electronically in MS WORD format (or format that can be converted to WORD). Include "Draft EMP Comments" in subject line.

[Email](#) comments or address comments on hard copy to:

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