

Comments of Vineland Municipal Electric Utility On the Draft Energy Master Plan

Vineland Municipal Electric Utility (VMEU) appreciates the opportunity to submit comments on the draft Energy Master Plan (EMP). The VMEU recognizes the considerable challenges that New Jersey is facing and supports the draft EMP's effort to guide the State toward a future with energy supplies that are reliable and environmentally responsible.

The VMEU, the only municipally-owned electric utility in the State which operates its own power generation facilities, has been providing electric service to the residents of the City for over one hundred years. Through the leadership of a new Administration in the City of Vineland, the VMEU is working on plans to improve the overall efficiency of its electric system, which includes reducing costs and developing new renewable sources. As the VMEU makes this transition, its main goals are to maintain and enhance a reliable system; provide and maintain the lowest possible customer cost; and improve the utility's environmental impact.

The VMEU is an advocate for renewable development and strongly supports the renewable goals and action items set forth in the draft EMP. In particular, the VMEU applauds the State on its noteworthy biomass goal of 900 MW by 2020. In order to obtain this goal in the most effective manner possible, the VMEU encourages the State to redefine a Class I renewable resource in the Renewable Portfolio Standard (RPS) to include materials separated from the waste stream, such as wood. By making this modification, it would allow high-quality biomass projects that include separated waste types to receive Class I

renewable energy certificate (REC) value and thereby enhancing the viability of project development and improving project economics to the residents of Vineland. Expanding the definition would demonstrate New Jersey's commitment to the development of biomass projects that utilize advanced renewable technologies.

The VMEU encourages the State to take a proactive approach when determining ways to support biomass growth. The VMEU believes that modifying the Class I biomass definition is a step in the right direction toward accomplishing the State's renewable energy goals.

The VMEU appreciates the opportunity to submit these comments and looks forward to doing its part to enhance environmental quality in New Jersey.