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July 24, 2008

Thank you for this opportunity to comment on the Draft Energy Master Plan. The New Jersey Audubon Society respectfully submits the following comments for your consideration.

The New Jersey Audubon Society (NJAS) is a privately supported, not-for-profit, statewide membership organization. Founded in 1897 and one of the oldest independent Audubon societies, NJAS fosters environmental awareness and a conservation ethic, protects New Jersey's birds, mammals, other animals, and plants, especially endangered and threatened species, and promotes preservation of New Jersey's valuable natural habitats. The New Jersey Audubon Society has nearly 25,000 members.

The New Jersey Audubon Society believes that the Draft Energy Master Plan needs to be strengthened in the following ways:

1. Greater emphasis on reducing energy demand below today's levels through energy efficiency.

The State's first priority must be to promote energy efficiency as aggressively as possible to reduce overall state-wide energy demand. Energy efficiency is the cheapest and fastest strategy available to meet the state's global warming reduction goals. At minimum, we should exceed the State's goal of a 20% reduction of projected demand by 2020.

To that end, the State should:

- Adopt aggressive efficiency standards for appliances that promote state of the art technologies to cut energy use, and should update standards as technologies improve.
- Adopt strong green building construction codes for new construction, redevelopment and major renovations.
- Continue and expand the energy efficiency rebate program within the Board of Public Utilities and should target the most cost effective efficiency strategies to promote efficiency among businesses and residents.
- Set a strong standard for utilities to work with customers to achieve additional reductions in energy demand, and require that such programs are fair and cost-effective for ratepayers.
- Require that government at all levels set a strong example by achieving greater energy reductions than the State as a whole.
- Expand combined heat and power.

2. Greater emphasis on building a sustainable electricity supply by maximizing the State's renewable energy potential.

In addition to curbing demand, the state should maximize renewable energy potential by setting strong and visionary goals and policies for adopting renewable technologies as swiftly as possible.

To expand the State's renewable energy generation, the State should:

- Meet the State's original goal of generating 22,500GWh of electricity from clean, renewable energy by 2020.
- Set a 2025 renewable portfolio standard (RPS) that requires that 40% of the State's electricity demand be generated by renewable technologies, including wind, solar, wave, micro-hydro, and geothermal.
- Use funds generated by the existing societal benefits charge to actively promote research and development of new renewable technologies.
- Provide incentives to grow the in-state renewable industry and create thousands of green collar jobs.

- In addition to promoting distributed clean energy projects, support proposals to transition to large-scale renewable energy projects, such as utility scale solar arrays and wind farms, to reduce the state's importation of dirty coal-generated electricity.

3. Address energy use and emissions from the transportation sector.

Transportation emissions account for roughly half of New Jersey's greenhouse gas emissions. While the energy master plan does not address transportation, significant advances in this sector must be made by 2020 to meet the state's long-term global warming goals.

The State should:

- Set goals to electrify transportation.
- Promote low carbon fuels that are efficient to process and do not interfere with food supplies.
- Employ strategies to reduce vehicle miles traveled.
- Reduce plans for highway expansions.
- Support an expansion of public transportation.
- Transition the State's fleet of vehicles to more efficient alternatives.
- Champion stronger, more comprehensive CAFE standards by being an advocate at the federal level.

4. Begin a transition toward sustainable space and water heating.

Heating accounts for a significant portion of New Jersey's greenhouse gas emissions. To reduce emissions from, and increase the sustainability of this sector, the State should begin to adopt programs to:

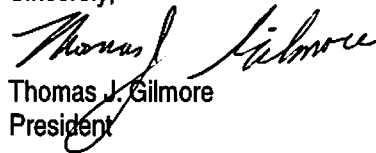
- Promote sustainable biofuels to replace fossil heating fuels.
- Promote passive solar, water pumps, and other renewables for both space and water heating.
- Electrify heating where possible.

5. Ensure long-term success.

To meet the State's ambitious 2050 global warming reduction goals, the energy master plan must be as bold and as visionary as possible. The progress that the State realizes over the next decade will influence the ability to meet the 2050 goals. The State should set strong benchmarks, ensure frequent review and updates, and demonstrate measurable yearly progress toward the goals outlined in the energy master plan.

Thank you for your consideration of these comments.

Sincerely,



Thomas J. Gilmore
President