

From: [Brendan Havner](#)
To: [comments_EMP](#)
Subject: [EXTERNAL] The Murphy Administration's Draft 2019 Energy Master Plan
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Hello,

The Murphy Administration's Draft 2019 Energy Master Plan commendably takes a more holistic and broader approach to combating climate change than its predecessors. It recognizes that we are far off track in meeting our clean energy goals and bold action is needed. It recommits the Administration to the specific targets and legal requirements of the Global Warming Response Act, and similar targets for offshore wind, solar, energy efficiency, electric vehicles, and storage, many of which were precedent-setting when announced.

However, the latest overwhelming scientific consensus dictates that much more needs to be done much sooner than previously realized. Unfortunately, the draft clearly fails to address this urgent situation even after discounting the fact that it is only a draft, while other states have already surpassed our efforts. The Administration must strengthen the final master plan along the following lines and accompany these changed policies with aggressive implementation:

- The EMP must include a moratorium on all new fossil fuel projects until GHG's are effectively regulated per below. Even the State's existing goals for reducing GHGs cannot possibly be met if New Jersey permits any of the dozen or so proposed fossil fuel projects. These new projects alone will increase GHG emissions by well over 30%. Fracked natural gas, with the supposed promise of short-term savings at the expense of higher and lethal future costs, will continue to stymie renewable energy projects. New fossil fuel projects make no economic sense, as they will need to be abandoned before the end of their useful life if we are to achieve 100% clean energy economy wide by 2050. When pressed on the need for a moratorium on these projects, Governor Murphy has responded that he is waiting for recommendations in the EMP yet the EMP does not even mention the word moratorium and is totally silent on these fossil fuel expansion projects.
- The goal of 100% carbon neutral energy by 2050 must be replaced with the goal of achieving 100% clean renewable energy by 2050. Carbon neutral includes energy from fossil fuel power plants with ineffective market-based schemes like carbon offsets, pollution credits and other pay to pollute schemes. Carbon neutral also includes garbage incineration, aging and new nuclear power plants, and more fossil fuel power plants with carbon capture and storage, an expensive technology that has never shown any commercial or practical viability. These dirty and dangerous energy sources and pollution trading schemes disproportionately impact low income communities and communities of color and block progress towards achieving the 100% renewable energy economy we urgently need.
- The EMP's goals are inadequate to address the immediate emergency we are facing. While the EMP recommits to the mandate established in the Global Warming Response Act (GWRA) to reduce greenhouse gas emissions 80% by 2050, it provides no interim milestones thus enabling reductions to be delayed. Meanwhile the consequences of climate change are occurring earlier and more rapidly than expected. We only have ten years to act. The latest Intergovernmental Panel on Climate Change [IPCC] report and the latest US National Climate Assessment call for rapid and immediate reductions in GHG's: 45% from 2010 levels by 2030 and net zero emissions around 2050. To meet these critical targets, our clean energy goals must be 100% renewable energy for electricity by 2035 and 100% renewable energy economy wide by 2050. These are readily attainable goals whose obstacles are mainly political, not technological or financial, when all costs and benefits are considered.
- GHG's must be regulated to achieve IPCC's 2030 target and GWRA's 2050 mandate. These pollutants are literally destroying the planet, and the authority to regulate them in NJ currently exists. The EMP only tepidly proposes to "study" this issue. There is nothing more to study here without action. NJDEP must immediately regulate GHGs to meet these targets.

- Total short and long term economic, social, health and total life cycle costs of burning fossil fuels must be calculated, disclosed and utilized by the EMP in setting policies. The draft document is silent on these costs.

- The State must regulate black carbon, pure carbon particulates, aka soot. This by-product of burning fossil fuels is a major contributor to climate change (orders of magnitude more potent as a climate pollutant than CO₂) and an ongoing threat to our respiratory health. It particularly affects our most vulnerable communities.

- The EMP drastically understates the global warming impact of methane released by the extraction, distribution and burning of natural gas. Over a 20-year period, methane is 86 times more potent than CO₂ as a GHG. Yet the EMP (a plan for policies over the next 30 years) only considers the impact of methane over a 100-year horizon. This drastically obscures its real effect on climate change in the near term by a factor of at least two-thirds and dramatically understates the amount of methane emissions occurring today and the volume of reductions required by 2030 and 2050.

- Labor's buy-in is essential, practically and politically, to meet the EMP's goals. This means including a realistic plan to ensure that the tens of thousands of new jobs in the green economy will be high quality jobs with workers having the right to organize. The EMP is completely silent on this issue.

- The EMP admittedly lacks detailed plans and adequate public input to accomplish its goals. It largely lacks any interim goals and milestones when there should be annual milestones for every goal in the report. While more details are expected in the final plan, this process prevents the public from having meaningful input and allows special interests to have undue influence. There must be a substantial opportunity for the public to have input on these details, especially the modeling results from the Integrated Energy Plan, in time to influence the final plan.

Many of the deficiencies in the EMP can be traced back to an apparent unwillingness to offend the natural gas industrial complex. Relying on natural gas is a bargain with the devil - short term electric bill cost savings at the expense of much greater external costs and long-term survival. The coddling of natural gas must end to protect our children and grandchildren. The EMP must speak truth to power, stand up for New Jersey families and provide for the quickest possible path to eliminating natural gas usage, which is not a bridge to clean energy, but a highway to climate catastrophe.

Governor Murphy has repeatedly promised that guidance and rules for constructing new gas power plants and pipelines/compressor stations would be addressed in the EMP and has used this to deflect criticism and defer action. The EMP completely ignores this subject and is effectively allowing these projects to proceed. With each passing day it becomes increasingly difficult to achieve the Administration's stated goals. The time to fulfill these promises is now.

Sincerely,
Brendan Havner