

## **Association of New Jersey Environmental Commissions (ANJEC)**

### **Comments on the Draft Energy Master Plan**

Aug. 23, 2011

The Association of NJ Environmental Commissions (ANJEC) appreciates this opportunity to offer comments on the 2011 Draft Energy Master Plan (EMP) in hopes of advancing New Jersey's clean energy future.

ANJEC works to establish and support environmental commissions in municipalities and counties throughout the state, educate public officials and concerned citizens and advocate for sustainable environmental action at the local level. Our 2,500 members represent approximately 380 municipalities and all 21 counties of New Jersey.

In addition to protecting natural resources and fostering sustainable land use, environmental commissions are very engaged in conducting energy audits and developing sustainability plans for their towns, implementing green municipal initiatives and educating members of their communities about how to save energy and reduce their carbon footprint. It is estimated that energy represents as much as 30 percent of a building's operating costs, so ANJEC's efforts to help environmental commissions promote energy audits and energy conservation measures for municipal buildings is helping cash-strapped local governments reduce costs without layoffs.

We support the EMP's stated objectives for managing our state's energy in a way that:

- drives down the cost of energy for all customers;
- promotes a diverse portfolio of new, clean, in-state generation;
- rewards energy efficiency and energy conservation and reduces peak demand;
- capitalizes on emerging technologies for transportation and power production; and
- maintains support for renewable energy portfolio standard; and

In the spirit of making the EMP as strong as possible, ANJEC offers the following comments.

- New Jersey should stand strong in its commitment to renewable energy by maintaining the Renewable Portfolio Standard goal established in the 2008 EMP of at least 30% renewable energy by 2020, and should provide adequate funding to continue promoting clean energy for all classes of ratepayers. With more than 10,000 solar installations already in place, and over 40 MW of solar capacity installed in June alone, industry momentum is clearly growing and the EMP could dampen that growth by signaling to the marketplace that NJ is flagging in its support for renewable energy.
- New Jersey should implement a strong, statewide plan to reduce energy demand at least 20% by 2020, and should provide adequate funding to continue helping all classes of ratepayers to make homes and buildings more energy efficient.
- New Jersey should continue to participate in the Regional Greenhouse Gas Initiative (RGGI), one of our only tools to tackle air pollution and greenhouse gasses from power

- plants, and should permanently dedicate RGGI funds to the clean energy projects for which they were originally intended.
- The EMP should include a comprehensive transportation component with specific strategies to reduce emissions by promoting electric vehicles, mass transit, transit-oriented development and other approaches to decreasing vehicle miles travelled.
  - Energy generation and transmission facilities should be sited in a manner that avoids negative environmental impacts.
  - Echoing the comments of other environmental organizations, ANJEC agrees that New Jersey should be working harder to:
    - Establish strong building codes for new construction that require new buildings to be 20% more efficient than existing codes.
    - Develop a plan for all new buildings to achieve net-zero carbon emissions by no later than 2030.
    - Do not offer tax breaks or incentives for construction of any new traditional power plants
    - Work to retire or clean up existing coal plants.
    - Oppose new coal plants, including the proposed PurGen coal plant in Linden.
    - When comparing energy generation costs, account for all life-cycle costs of traditional generation, including construction costs, lifetime fuel costs, air pollution, water pollution, public health costs, contribution to climate change, waste storage or treatment, and environmental disruption.

Thank you for your consideration of these comments. We would be happy to discuss them further with you and can be reached at (973) 539-7547.