



# NEW JERSEY HIGHLANDS COALITION

508 Main St. Boonton, NJ 07005 • 973-588-7190 • [www.njhighlandscoalition.org](http://www.njhighlandscoalition.org)

New Jersey Board of Public Utilities  
Energy Master Plan  
Two Gateway Plaza, 8th Floor  
Newark, NJ 07102  
by email: EMP [admin@njcleanenergy.com](mailto:admin@njcleanenergy.com)

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## **RE: Stakeholder comments, 2010 NJ Energy Master Plan**

Thank you for the opportunity to comment on the shaping of the 2010 draft Energy Master Plan. The New Jersey Highlands Coalition has been a force in the preservation of the water and other natural and cultural resources of the NJ Highlands since 1988. These comments are on behalf of our 47 member organizations.

The purpose of the New Jersey Energy Master Plan, as stated in the 2008 Plan is "to guide us toward a responsible energy future with adequate, reliable energies supplies that are both environmentally responsible and competitively priced."

The overview statement of the September 22nd stakeholder meeting in Bordentown this week was different in tone: "The building blocks of a diverse and secure energy future must balance three critical elements—reliability, safety and affordability." This is a true statement. However, the omission of any reference to "environmental responsibility" causes us to wonder if priorities have indeed shifted, and if so, we are greatly concerned. The critical element of "safety" might tangentially allude to vague environmental considerations, but this more so suggests that the sources of energy and its delivery are not going to electrocute us or vaporize us. Where is the assurance that environmental responsibility is as much a building block as reliability, safety and affordability in the shaping of energy policy?

The innovators who first brought to market such concepts as renewable energy, green building, demand response, etc. created these concepts within the context of sustainability and environmental responsibility. States, including New Jersey, in adopting a renewable portfolio standard and issuing solar and other renewable energy certificates have through policy, exerted control over the marketplace, that it grow in order to achieve goals towards a more sustainable future. Please keep it up and build upon it because it is, in the long term, environmentally and economically good policy.

But RECS, SRECS, WRECS, and other "green" certificates cannot be merely market commodities. Clean water, clean air, quality of life, public health and well being must be considered as intrinsically important as any economic factor. You may not be able to offer certificates for such environmental considerations, but they must be certifiable nonetheless.

Let me give you an example. PSE&G's proposed Susquehanna to Roseland transmission line upgrade project in many areas conflicts with the stated goals of the 2008 Energy Master Plan. You could easily develop a master plan that would accommodate such a project, but you would have to first discard any concern for the air pollution that rains on us from the coal fired plants in Pennsylvania, West Virginia and elsewhere that feeds into this transmission line. You would also be allowing avoidable impacts to upland forests, fresh water wetlands, threatened and endangered species and significant recreational and cultural resources. You would also slow any market driven incentives towards incorporating smart grid technology and demand side management.

It would be so easy to develop a Plan that put the environment in the back seat. Well, anyone could accomplish that. We expect you to work harder.

Is the cost of energy forcing business to flee to neighboring states such as Pennsylvania? Well, New Jersey does rank 8<sup>th</sup> in the country in the cost of electricity<sup>i</sup>. Pennsylvania ranks 45<sup>th</sup><sup>ii</sup>. But we don't want the dirty coal fired plants that provides cheap electricity to Pennsylvania. If you recall, just 2 weeks ago, Commissioner Martin petitioned the federal government to enforce the Clean Air Act against a coal fired plant in Pennsylvania that pollutes our air.

Some other statistics that should mitigate any concern about energy costs in New Jersey as an indicator of our business climate and as a place to live. We rank 2<sup>nd</sup> in median household income<sup>iii</sup>. We are first in percentage of households that are millionaires<sup>iv</sup>. We are 30<sup>th</sup> in the rate of personal bankruptcy<sup>v</sup>— Pennsylvania, by the way is ahead of us at 23<sup>rd</sup><sup>vi</sup>. We rank 8<sup>th</sup> in gross state product<sup>vii</sup>—all of the states ahead of us are hugely larger both in size and in population. We are 7<sup>th</sup> in the number of Fortune 500 Companies headquartered in a state<sup>viii</sup>. We rank 6<sup>th</sup> in the percentage of college graduates<sup>ix</sup>. New Jersey remains a choice place to live, to work and therefore, a place to do business. New Jersey is a great place, please do your part in keeping it that way for all of us.



Elliott Ruga  
New Jersey Highlands Coalition

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<sup>i</sup> Dept. of Energy, Energy Information Administration; May 2008 data. Retail price of electricity used by residential, commercial, industrial and transportation sectors.

<sup>ii</sup> Ibid

<sup>iii</sup> US Census Bureau, American Community Service; 2007 data.

<sup>iv</sup> Phoenix Marketing International; 2007 data.

<sup>v</sup> CQ's State Rankings 2008

<sup>vi</sup> Ibid

<sup>vii</sup> US Bureau of Economic Analysis; 2007 data

<sup>viii</sup> Fortune 500; 2008 data

<sup>ix</sup> US Census Bureau, American Fact Finder, 2006 data