

Comments on: New Jersey Board of Public Utilities Energy Master Plan 2024

**Submitted by the New Jersey Environmental Justice Alliance to the New Jersey
Board of Public Utilities**

May 1, 2025

Introduction

The New Jersey Environmental Justice Alliance (NJEJA) respectfully submits our comments to the New Jersey Board of Public Utilities (BPU) in the matter of the 2024 New Jersey Energy Master Plan, Docket No. QO24020126.

The New Jersey Environmental Justice Alliance

The New Jersey Environmental Justice Alliance (NJEJA) is a statewide organization mobilizing other organizations and individuals in order to increase the quality of life and upward mobility opportunities for communities that experience additional burdens resulting from histories of systemic injustice. Our work covers a wide range of areas, and we believe that the community's vision of improvement will always be the most effective and an important part of strategic development.

Therefore, as part of our ongoing work to support communities most impacted by disproportionate pollution burdens - and therefore, at the most risk of natural disaster and storm devastation - we submit these comments today in an effort to assist the BPU in their effort, "to ensure that safe, adequate, and proper utility services are provided at reasonable, non-discriminatory rates to all members of the public who desire such services. To develop and regulate a competitive, economically cost-effective energy policy that promotes responsible

growth and clean renewable energy sources while maintaining a high quality of life in New Jersey.”¹ Our range of work, state-wide and national reach, and diversity of membership give us a unique perspective on environmental protection and allow us to bring the concerns of historically overburdened communities to the forefront of the conversation. We welcome continued conversation on this matter.

Support for Analysis of Stakeholder Feedback and Progress Thus Far

NJEJA first wants to offer support and alignment with the organization of stakeholder feedback outlined in the project as well as the outlined progress, including EO307, EO315, EO316, ACT, ACC II, and NESCAUM rules. These measures, including increased emphasis and support for “no regret” decisions, are in line with the best outcomes for environmental justice communities and realistic, easily implemented measures.

In this space, we offer two points of guidance. First, implementation of “no regret” measures should first begin in overburdened communities as identified by the NJDEP EJ Map. In doing so, the BPU has the opportunity to ensure that communities that are most affected by the burden of toxic air pollution then have the opportunity to experience the benefits of implementation of measures that decrease pollution and create a clean environment.

Additionally, we strongly encourage the BPU to emphasize and highlight the benefit of societal impacts from electrification, including outlined public health benefits, as well as decreased medical bill costs, which have direct benefits to the state’s economic outlook. Furthermore, we encourage the BPU to consider the mental and psychological health benefits of a cleaner environment, including decreasing levels of stress about climate change, natural disasters, and overall community health.

¹ New Jersey Board of Public Utilities. *Mission Statement*. Board of Public Utilities. <https://www.nj.gov/bpu/about/mission/>.

Decentering Carbon

As we have previously stated in our comments, the BPU must make clear that decarbonization efforts do not focus entirely on greenhouse gas emissions (GHG), but instead are expansive in addressing both GHGs and GHG co-pollutants, including but not limited to nitrous oxides (NO_x), particulate matter, and ozone. To this end, a reframing of decarbonization and energy goals can be understood through the lens of NJEJA's Cumulative framework^{2 3} which recognizes that communities burdened by pollution do not experience toxic emissions in disparate silos, but in the aggregation of all of the pollution burden of the area. Therefore, it must be stated plainly: environmental justice communities experience toxic air emissions at higher rates due to the accumulation of pollution from multiple sources in one area.

To this end, NJEJA urges BPU to refrain from considering alternative fuels, low-carbon fuels, decarbonized fuels, or any such synonyms when working towards the goals outlined in the EMP. These fuels often contribute to GHG co-pollutant emissions and are not in line with the vision of environmental justice communities, not just in New Jersey but across the country.

In this context, we re-emphasize our definition of clean energy as outlined in our 2024 comments:

Defining Clean Energy

The definition of clean energy and any other term used to describe energy that transitions us away from fossil fuels and towards sustainable, renewable energy that does not further harm EJ communities⁴ should be grounded by the same understanding and definitional agreement. In defining clean energy, we point to energy generation that neither

² New Jersey Environmental Justice Alliance and Center for the Urban Environment of the John S. Watson Institute for Urban Policy and Research at Kean University. "Cumulative Impacts Basic Primer." New Jersey Environmental Justice Alliance, n.d.

https://njeja.org/wp-content/uploads/2023/11/Cumulative-Impacts-Basic-Primer_English.pdf.

³ Sheats, Nicky. Cumulative Impacts and the Permitting Process, June 2013.

https://njeja.org/wp-content/uploads/2021/08/NJEJA-Statewide-Cumulative-Impacts-Policy_2019.pdf.

⁴ The term "environmental justice communities" refers to communities Of Color and communities with low-income.

accelerates climate change nor contributes to local air pollution levels, including levels of GHG co-pollutants. Therefore, renewable energy must only be defined as solar power, wind power, and small hydropower projects.

To be clear, we do not consider hydrogen combustion, the use of carbon capture utilization and storage/carbon capture and storage (CCUS/CCS), incineration, burning of biomass, liquid natural gas (LNG), renewable natural gas (RNG), or nuclear as clean, renewable, or green.

Similarly, any definition of clean energy that uses “net zero” measurements, offsets, or trading systems/mechanisms.⁵ While analysts debate whether or not these systems are successful in reducing CO2 emissions, assuming these systems were a valid strategy, they do not guarantee reduction of carbon as a whole, nor do they reduce GHG co-pollutants, and therefore are not in line with environmental justice principles.

Reiterating Concerns Regarding CCS and Hydrogen Highlighted in Our Previous Comments

Carbon Management: The Flaws of CCS and Hydrogen

“With regards to the growing conversation regarding CCS and hydrogen (particularly hydrogen co-firing and the federally-funded hydrogen hubs). NJEJA has been active participants in the discussion regarding CCS and hydrogen, having written and provided extensive public comment regarding the risks of such technologies, their lack of financial feasibility, and the ways in which they do not truly provide a pathway to divestment from fossil fuels.

“With regards to CCS, there is significant debate surrounding the efficacy of carbon capture technologies. One such example includes the Petra Nova project, which received

⁵ Sheats, Nicky. “Comments on the Draft 2019 New Jersey Energy Master Plan.” New Jersey Environmental Justice Alliance, September 16, 2019. https://njeja.org/wp-content/uploads/2021/08/Comments-on-the-Draft-2019-New-Jersey-Energy-Master-Plan_2019.pdf.

\$195 million dollars in funding from the Department of Energy.⁶ The project encountered multiple technical difficulties, could not stay consistently operational, and did not capture CO₂ at its promised rate. The project aimed for a 33% capture rate, but averaged around 17%.

“However, if these projects were able to find success, they still do not serve EJ communities in a meaningful way as CCS does not lead to a transition away from fossil fuels nor does it capture GHG co-pollutants, which pose significant risks for local air pollution, health outcomes, and host communities. Furthermore, there are significant risks of pipeline leakage and rupture which can lead to highly hazardous situations. CO₂ is odorless, colorless, heavier than air, and an asphyxiant and intoxicant which can lead to physical harm and death in humans and animals in surrounding areas. Likewise, CCS can lead to seismic activity and groundwater contamination.

“With regards to hydrogen usage, blending, co-firing, and the proposed hydrogen Hubs, there are several similar associated risks. Throughout the entirety of the hydrogen lifecycle, there are risks regarding production, transportation, storage, and usage. Any type of hydrogen produced other than green hydrogen relies on non-renewable energy and thus perpetuates harm. However, even green hydrogen relies on significant water consumption and diverts valuable renewable energy resources that could be more efficiently used elsewhere. Furthermore, the use of hydrogen fuel cells in fleets is not as effective as electrification.⁷

“Hydrogen as an energy source will require significant infrastructural development, even if current pipeline systems are utilized. Production facilities, transportation infrastructure, storage operations, and the ability to utilize hydrogen will require vast public subsidies all of which has not yet seen adequate public engagement, input, or transparency.

⁶ Directors, Clarion Energy Content. “Groundbreaking Petra Nova CCS Project Back up and Running, Owner Says.” *Power Engineering* (blog), September 14, 2023. <https://www.power-eng.com/emissions/groundbreaking-petra-nova-ccs-project-back-up-and-running-owner-says/>.

⁷ “Heavy Duty Trucks | Moving Forward Network,” April 3, 2022. <https://www.movingforwardnetwork.com/heavy-duty-trucks/>.

Furthermore, the risks of leakage, explosion, and increased emissions associated with hydrogen production demonstrates that this technology is not a viable investment. Hydrogen in general, as the smallest element, vibrates at an incredibly high frequency and thus is more prone to creating cracks and fissures in pipelines, especially if rigorous safety measures are not put into place. Such cracks can lead to leaks and explosions as a result of hydrogen's high flammability. Hydrogen explosions are larger and burn hotter than methane, risking the lives of host communities and damage to the environment where this infrastructure is situated. Additionally, hydrogen production holds the potential to increase NOx emissions as well. Such renewable energy would be more effective and better suited to the goals of electrifying sectors currently relying on fossil fuels.

“This infrastructural investment can and should be pivoted to focus on truly clean, renewable sources of energy that does not continue to place EJ Communities in positions of precarity and risk to health, physical safety, and life.”

- NJEJA Comments on NJBPU Energy Master Plan⁸
Submitted June 12, 2024

Decarbonization Versus Electrification

As aforementioned in previous sections highlighting our position on the definition of clean energy, we want to be clear that a Just Transition away from fossil fuels does not include “decarbonized” or “alternative” fuels, but instead focuses on truly renewable and sustainable energy forms, i.e. solar power, land-based wind power, offshore wind power, long-duration battery storage, and energy efficiency mechanisms.

To this end, any sector that is seeking to reduce emissions and transition from fossil fuel energy should first examine the opportunity and long-term stability of implementing electrification

⁸ NJEJA and ICC comments on the BPU Energy Master Plan 2024,
https://publicaccess.bpu.state.nj.us/DocumentHandler.ashx?document_id=1346329

systems. In a concrete example, we strongly encourage the BPU to collaborate with other agencies and entities to consider opportunities for action in implementing electrification measures for all trucks, trains, and other modes of transportation operated by the state by 2035.⁹

Similarly, we encourage co-terminous implementation of battery storage and energy efficiency measures to ensure that dual usage is integrated in state plans as best practices. This not only supports energy usage goals, but supports the state’s long-term energy and climate goals.

Notes on Pace and Funding

We appreciate the emphasis on remaining “laser focused” and acknowledging that the pace must significantly increase in order to reach the outlined goals. As such, we offer a few notes on pace and associated funding costs. As highlighted in the March presentation, funding still presents a barrier to implementation. We encourage the BPU to consider all forms of funding, including but not limited to rebates, tax credits, direct pay grants, low-interest loans, etc., for adaptation for all facilities, buildings, and communities across the state. This may be more specifically applicable to communities and community-based organizations looking to implement clean energy projects, energy efficiency measures, etc., but lack start-up capital to accomplish their goals. To this end, examination of a multitude of funding mechanisms, with inclusion for direct pay options, would support organizations doing community-based work as well as less well-financed municipalities who seek to engage in reaching the state’s clean energy goals but have limits on beginning participation.

Conclusion

These comments are submitted in an effort to share understanding and best practices with the NJ Board of Public Utilities. As a result of our long history engaging in energy work at the local, state, and federal level, we are uniquely positioned to highlight how EJ communities in New Jersey are impacted by toxic air pollution, energy burden, and cost. We support the BPU in their

⁹Jimmy O’Dea. *Zero-Emissions Technology for Freight: Heavy-Duty Trucks*. Moving Forward Network. October 2020.
https://www.movingforwardnetwork.com/wp-content/uploads/2020/10/MFN_ZeroEmissionToolkit-1.pdf

effort to advance the Energy Master Plan to support the state’s clean energy goals and facilitate a robust development of clean energy projects. We offer our continued support in building more resilient communities free from disproportionate burdens of air pollution and have the ability to exercise their right to live, work, play, and pray in a pollution-free community. We are willing to engage in ongoing conversation with the NJBPU concerning the thoughts presented in these comments.

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