



2011 Draft Energy Master Plan

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President Solomon and members of the board:

Thank you for this opportunity to testify on the 2011 Draft Energy Master Plan.

New Jersey Future is a nonprofit, nonpartisan organization that promotes smart growth. From this perspective, we have submitted detailed written comments, a few of which I will highlight today.

Locating Solar Facilities

New Jersey Future encourages increased reliance on renewable energy sources including solar energy. Our state is unquestionably a national leader in solar installations, due in large part to subsidies that make it economically feasible. The Draft Energy Master Plan correctly points out that ratepayer subsidies can be used to incentivize certain types of projects that meet multiple state land-use goals, such as solar on brownfields and landfills.

New Jersey Future recommends:

1. The Energy Master Plan should note that single-use solar facilities are not necessarily the highest and best use for *every* brownfield and landfill location; some brownfields and landfills also happen to be prime redevelopment sites in key locations, such as next to a train station. Each proposed single-use solar site should be evaluated for its near-term redevelopment potential before installing ground-based solar arrays that will prevent more intensive development of the site. We recommend that the BPU require applications for solar incentives to note whether the site is located in an approved redevelopment area, and if so, to seek assurance from the municipality that the proposed solar project will not impede local redevelopment efforts.
2. The Energy Master plan should recognize and incentivize solar facilities in those locations that are consistent with other state policy objectives, including not only brownfields and landfills, but also other impervious surfaces, such as rooftops and parking structures, that have few or no negative impacts on land preservation or redevelopment potential. We recommend “tiered incentives” so that solar projects in the

most advantageous locations — rooftops, brownfields and landfills — receive the most generous incentives.

While we expect solar facilities to continue to be sited on some combination of ground and rooftop, our [research](#) suggests that there is likely to be more than enough rooftop space in New Jersey to meet its long-term goals. We engaged a graduate student intern who approached this question in two ways. First, he estimated the square footage of rooftop needed to meet the state's solar development goals for 2026 at 327 million square feet, a fraction of the state's total impervious surfaces, which are estimated at 22 billion square feet. Second he looked at a national study that estimated the solar output capacity of New Jersey's commercial and residential rooftops, and found a total rooftop potential for New Jersey of over 9,000 MW, which is more than double the state's goal for 2026. Although both approaches apply assumptions across a broad area without detailed analysis, they suggest a great deal of additional potential for further use of rooftops.

Energy Use from the Transportation Sector

Transportation, specifically the private automobile, is by far the largest consumer of energy in New Jersey, and is also the fastest-growing. Yet the Draft Energy Master Plan scarcely mentions it. Numerous studies have shown that electric cars and clean fuels alone will not be nearly enough to reduce transportation energy consumption, because they will be outpaced by the growth in vehicle miles traveled (VMT), so any credible plan must find ways to reduce transportation *demand*.

The 2008 version of the Energy Master Plan opted not to address this sector, leaving it instead for the Department of Environmental Protection's Global Warming Response Act Recommendation report.

The DEP report not only recognized the sizeable portion of New Jersey's energy demand attributable to transportation, but minced no words in identifying the state's sprawling land-use patterns as a major contributor to that demand, and with it to greenhouse gas emissions. Yet since its release in 2009, the DEP report has lain dormant. What we are left with, then, is a Draft Energy Master Plan that pays no attention to transportation, and a Global Warming Response Act Recommendations report that pays lots of attention to transportation but is evidently being ignored by policymakers.

New Jersey Future recommends that the state formally and comprehensively address energy use and greenhouse gas emission from the transportation sector, either by having BPU revise the Energy Master Plan, or by having the DEP update the Global Warming Response Act Recommendation report.

Commitment to a Green Economy and a Green Future

When Governor Christie announced his intention to pull out of the 10-state Regional Greenhouse Gas Initiative (RGGI), New Jersey Future lamented that it signaled a change in direction away from the administration's stated support for a green future. A number of provisions in the Draft Energy Master Plan reinforce this trend.

New Jersey Future recommends that the administration revise the Energy Master Plan to demonstrate a continued strong commitment to the green economy so that New Jersey can attract quality, high-paying jobs in this expanding field. For instance, if the state withdraws from RGGI as planned, it should replace the RGGI-generated funds that were dedicated to increasing the supply of electricity from alternative sources, reducing demand through energy efficiency measures and providing financially strapped municipalities with resources to plan for sustainable land-use and transportation projects. With these funds, the state could make our companies more competitive and reduce the cost of energy for all users.

Thank you for your consideration of these comments.