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NJ Board of Public Utilities
Board Secretary
44 South Clinton Avenue
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Trenton, New Jersey 08625-0350

Attention: Docket # QO24020126

I am writing on behalf of the NJ Asphalt Pavement Association (NJAPA) and the NJ Construction Materials Association (NJCMA) to comment on the 2024 update to the State's Energy Master Plan.

NJAPA and NJCMA collectively represent more than 120 companies involved in asphalt, stone, sand, gravel, ready mixed concrete manufacturing, construction and related industries. Our membership represents 100% market share of asphalt produced in New Jersey and a significant portion of aggregate and concrete production. Our members employ an estimated 10,000 hard working professionals throughout the State.

While we support broadly the goals set forth in the Energy Master Plan including 100% Clean Energy by 2035 and to reduce greenhouse gas emissions 80% by 2050, there are a number of practical concerns which must be acknowledged.

Our industry currently relies on a fleet of heavy equipment which is not yet capable of being electrified. While equipment manufacturers such as Caterpillar are actively working to develop, refine and implement new technologies, it is not yet practical, available or cost effective at size and scale necessary for our operations.

We would fully support implementation or expansion of programs to voluntarily replace older vehicles and equipment with newer models which are more energy efficient.

Many of our operations also run on natural gas. Similar to our concerns about fleet electrification, the technology and cost associated with converting natural gas plants to electric is non-existent, limited and prohibitive on all fronts.

While we support the development of new clean energy production in New Jersey, we should not limit ourselves. We must also consider natural gas, which is clean, safe, affordable and abundant, as an important part of our State's energy portfolio.

We would encourage the BPU to maintain and continue gas modernization programs for the local gas distribution companies in New Jersey so they may continue to replace antiquated gas mains and services to help mitigate leaks and emissions.

Finally, it is important to remember that all of these policy goals, while perhaps admirable, come at a cost to the citizens of our State. Many of the proposals set forth in the Energy Master Plan if implemented as is, and under the timeframes required, will lead to increased costs for public and private construction.

Thank you for your consideration.

Kevin Monaco

Kevin Monaco
Executive Director