

October 9, 2024

Doreen M. Harris
President and Chief Executive Officer
New York State Energy Research and Development Authority
17 Columbia Circle
Albany, NY 12203-6399

Re: Greater Rochester Chamber Comments on Draft Blueprint for Consideration of Advanced Nuclear Technologies

Dear President Harris,

I am writing on behalf of Greater Rochester Chamber to support the New York State Energy Research and Development Authority (NYSERDA) for developing the *Draft Blueprint for Consideration of Advanced Nuclear Technologies* and holding the Future Energy Economy Summit last month to discuss the advancement of new clean technologies, like nuclear generation. These actions help solidify New York's stalwart position of advancing new, innovative solutions to combat climate change.

Additionally, we're encouraged by NYSERDA's commitment to help advance the Public Service Commission's (PSC) on-going investigation of potential clean technologies in support of the Climate Leadership Community Protection Act's (CLCPA) 2040 zero-emissions electricity system target. While the Commission has not yet adopted a definition of "zero emissions" we firmly believe existing nuclear generation, and new advanced nuclear technologies, should be characterized as a zero-emissions resource.

Preserving New York's existing nuclear facilities should be the highest priority and Greater Rochester Chamber strongly supports the state exploring a variety of solutions to build New York's clean energy future including the potential for advanced nuclear technologies. Upstate New York hosts the state's existing nuclear facilities and as discussed at the Summit, panelists discussed co-locating advanced nuclear facilities in places where people are accustomed to them and capable workforces exist, including at existing nuclear power plant sites.

As a leading voice for business across our nine-county Finger Lakes region, Greater Rochester Chamber of Commerce will continue to prioritize the access to energy our businesses need to ensure the upward trajectory of our regional economy. For decades, residents and businesses alike have relied on nearby nuclear energy to support our economy and enhance our quality of life. What's more: nuclear energy is clean, safe, and effective at powering our grid and should remain atop our energy priorities when considering economic development investments.

As acknowledged in NYSERDA's, *Draft Clean Energy Standard Biennial Review*, there are challenges to achieving New York's nation-leading decarbonization, renewable energy, and zero

emission goals established by the CLCPA.¹ Since these goals were established, a myriad of issues have hindered new renewable development while at the same time, New York State is experiencing unprecedented economic growth.

Nuclear energy's always-on, reliable, base-load power is essential to meeting the state's electrical demand now and in the future. The New York Independent System Operator (NYISO) forecasts a 300 percent surge in electricity demand by 2040 due to the state's electrification efforts and significant high-load economic developments.² As more intermittent, renewable resources come online, New York's need for Dispatchable Emissions Free Resources (DEFERs) will increase as demand grows and traditional, fossil-fueled dispatchable resources are phased out and the 2040, and 2050 net-zero economywide emissions deadlines approach.

The Climate Action Council's (CAC) Scoping Plan acknowledges the state's existing upstate nuclear power stations' contribution towards grid reliability and achievement of the state's decarbonization goals - New York's upstate nuclear facilities currently produce 46% of the state's carbon-free electricity, approximately 32,000 gigawatt-hours (GWh).³

Further, the Scoping Plan assumes New York's upstate nuclear fleet will be granted license extensions to operate an additional 20 years and recommends the state should evaluate the role of existing and advanced nuclear facilities prior to the scheduled conclusion of the Zero Emissions Credit program in 2029 while recognizing the time required to relicense and refuel these facilities.

We need to ensure these facilities have the policy support to remain environmental and economic engines for our region while also considering new policy mechanisms to incentivize new, advanced nuclear technologies.

Thank you for your consideration.

Respectfully,



Robert J. Duffy
President and CEO

¹ Department of Public Service | NYSEDA, Draft Clean Energy Standard Biennial Review, (July 1, 2024)

² NYISO, *2021-2040 System & Resource Outlook*, at 9 (Aug 8, 2022), [99fb4cbf-ed93-f32e-9acf-ecb6a0cf4841 \(nyiso.com\)](https://www.nyiso.com/documents/20199/20220808_99fb4cbf-ed93-f32e-9acf-ecb6a0cf4841) (the "NYISO Outlook Report").

³ Department of Public Service | NYSEDA, *Draft Clean Energy Standard Biennial Review*, at 9 (July 1, 2024)