



SCOTT A. GRAY
Assemblyman 116th District

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ALBANY

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Thank you for the opportunity to comment on the critical potential of advanced nuclear technology within New York's energy landscape. As we move towards a future defined by clean, reliable, and affordable energy, nuclear energy must be a cornerstone of our strategy.

Nuclear energy offers a reliable and controllable dispatchable source of power, essential for meeting the high demand of extensive commercial, industrial, or manufacturing facilities. Unlike other renewable resources, nuclear generation requires considerably less land than solar installations while providing significantly more high-paying construction and operational jobs. This not only supports local economies; it also strengthens our workforce.

Larger companies with high load demands, such as Micron, Google, Microsoft, and Amazon, to name a few, are increasingly seeking an emission-free footprint, and advanced nuclear technology which offers emission-free modular siting with scalable capabilities. In addition to economic development opportunities, nuclear technology enhances grid stabilization as well as provides a dispatchable, reliable, and controllable energy source. Nuclear energy sites themselves are similar to existing energy facilities in that they are substantially beneficial to surrounding communities by being sources of quality, high-paying jobs.¹

As for safety and security, proposed advanced nuclear technologies are projected to be inherently safe, even safer than traditional reactors, whose negative experiences are few. However, security is required and we have many assets that currently require high levels of security so it isn't a new concept. Also, cybersecurity is a constant concern in many sectors including energy and threats will remain ever evolving as they outpace security measures in every industry. Armed with innovations similar to those seen in battery storage, these technologies come with enhanced safety measures.

Nevertheless, as NYS advances in nuclear technology, it is crucial to establish thorough design, security, and safety policies when deploying First-Of-A-Kind (FOAK) facilities. NYS formed a working group to design and develop such policies for battery storage only after witnessing several incidents and missteps in the deployment of battery storage facilities. Therefore, it is essential to construct these policies for nuclear reactor sites as much as possible in advance or collaborate with other stakeholders to ensure NYS develops and adopts proper procedures.

¹<https://www.utilitydive.com/news/doe-serial-development-approach-nuclear-reactors-smr-load-growth-ira/729217/>

New York is uniquely positioned to lead in this energy field. A private/public partnership through initiatives by companies could be mutually beneficial and attract them to locate in NYS.

Also, DOD-led initiatives that are scheduled on current military installations² present an ideal partnership opportunity with the federal government. The DOD is committed to energy independence and 100% emission-free electricity. An army installation dedicated to a power projection platform and boasting microgrid infrastructure is the ideal location for this collaboration.

It is a well-known fact that the State of New York hosts qualified US Army facilities. As such, a collaboration would focus, in particular, on technology demonstration, security measures, supply chain development, alleviating safety risk concerns, and a comprehensive understanding of the labor force requirements. It will offer a chance to cultivate and train our workforce, ensuring New York is at the forefront of this energy transition. Collaborating with the federal government would provide the ideal opportunity to develop a policy about all the above-mentioned items in a FOAK setting before community-based small modular nuclear operations.

By embracing advanced nuclear technology, we align with the U.S. Department of Energy's goals and leverage federal support to streamline regulatory processes. This partnership would bolster our energy grid and contribute to a carbon-neutral economy as mandated by the Climate Leadership and Community Protection Act.

The New York Power Authority (NYPA) Robert Moses power project has long been a cornerstone in harnessing hydroelectric power through its iconic dams. One of its significant contributions is supplying energy toward innovative projects such as the Air Products' green hydrogen plant. This facility is a critical player in the transition to sustainable energy, utilizing clean hydrogen electrolyzer production methods powered by renewable energy from NYPA's infrastructure.

Looking forward, there is potential for further enhancement of power generation capabilities by integrating advanced nuclear technology reactors in conjunction with NYPA transmission upgrades currently underway. These reactors could complement the existing hydroelectric power, ensuring a robust, diversified energy supply that supports economic development projects and contributes to a cleaner, more sustainable future.

This is a pivotal moment for New York and the state must position and prepare for technological readiness for commercial deployment. Integrating advanced nuclear technology into our energy strategy can achieve a sustainable, zero-emissions future, create high-paying jobs, and enhance our state's energy security. Let us seize this opportunity to collaborate at every level of government, ensuring that New York remains a leader in clean energy innovation.

Thank you.
Scott Gray

²<https://www.utilitydive.com/news/us-army-seeks-nuclear-microreactors/719120/>