

National Fuel Gas Distribution Corporation's Comments on the Draft Blueprint for Consideration of Advanced Nuclear Technologies

National Fuel Gas Distribution Corporation (“National Fuel” or “Company”) provides natural gas utility services through a local distribution system located in western New York and northwestern Pennsylvania. Its New York service territory spans several counties and includes the cities of Buffalo, Niagara Falls, Batavia and Jamestown. The Company's New York customer base consists of over 540,000 customers among a population of more than 1.6 million people in western New York.

In September, Governor Hochul convened the Future Energy Economy Summit in Syracuse, attended by energy experts from across the state, to spur much-needed discussion around two undeniable truths: the demand for energy in New York is rising, and exploring innovative energy technologies is crucial for meeting that demand. Governor Hochul has also recently expressed support for an “all of the above” energy strategy, recognizing the need to supplement renewable energy sources with other low- and no-carbon energy options to achieve the Climate Leadership and Community Protection Act’s (“Climate Act”) emissions reduction requirements. For several years now, an “all of the above” approach is precisely what National Fuel has advocated for as well. National Fuel believes an “all options” pathway that doubles down on energy efficiency and embraces a broad range of solutions is the optimal path forward because it can meet the state’s emissions reduction goals while safeguarding energy affordability and reliability. National Fuel’s “all of the above” pathway includes priorities and initiatives such as weatherization and energy efficiency, hybrid heating, and the use of low- and no-carbon fuels such as renewable natural gas and hydrogen, provided through a modernized, weather-resistant delivery network.

At the Future Energy Economy Summit, a *Draft Blueprint for Consideration of Advanced Nuclear Technologies* (“Blueprint”) was issued in furtherance of a discussion regarding a potentially expanded role for nuclear energy in New York. In light of recent reports confirming the challenges associated with meeting the Climate Act’s emissions reduction requirements, National Fuel believes that a careful examination of advanced nuclear technology options is appropriate, including issues raised in the Blueprint such as “technological readiness and systemic challenges and issues” and “costs and cost risks.” Evaluating advanced nuclear technologies as a possible emissions reduction solution for the state is consistent with the critical “all of the above” energy strategy espoused by the Governor and advocated for by National Fuel, and the Company supports the Blueprint’s objective “to create a platform for additional analysis and stakeholder input on these options that moves New York forward toward its energy, economic, climate and equity goals.” This kind of thorough analysis will be necessary as the state seeks an appropriate balance of energy initiatives that will address the unique needs of its diverse regions while maintaining safe, reliable and affordable energy for its residents and businesses.