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President and CEO Doreen Harris
NYSERDA
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Albany, NY 12203-6399

Dear President Harris:

We at Generation Atomic write in enthusiastic support of NYSERDA's Blueprint for Advanced Nuclear Technologies. As a pro-nuclear environmental nonprofit dedicated to climate action and energy justice, we believe this blueprint highlights a viable path for New York's energy future.

The blueprint's finding that New York will need at least 20 GW of clean dispatchable power by 2050 to complement wind and solar resources underscores the urgency of embracing nuclear energy. This is not just about numbers – it's about responsibility to future generations. As we work to decarbonize our economy while meeting growing energy demands and maintaining reliable access to power, we cannot afford to exclude any clean energy technology, especially one with nuclear's proven track record.

We are particularly encouraged by the blueprint's recognition of advanced nuclear's potential to support healthy local economies, especially in communities affected by fossil fuel plant closures. Existing nuclear communities are generally highly supportive¹ of the technology and existing plants, as they supply sustained economic prosperity through high-paying jobs and robust local tax bases.² The opportunity to site new nuclear plants at former fossil fuel locations epitomizes the ideals of a just transition - that no community should bear an unequal burden from our energy systems.

The blueprint rightly notes that large-scale advanced light water reactors are currently the only fully commercial nuclear technology available. While we support continued innovation in nuclear design, we shouldn't let perfect be the enemy of good. These proven reactors, combined with their "lowest level of overall safety-related impacts of any major energy source," provide an immediate path forward for clean energy deployment. The AP1000 reactor design, for example, has demonstrated

¹ <https://www.nei.org/news/2022/reverse-nimby-residents-say-nuclear-good-neighbor>

² <https://www.bisconti.com/blog/9th-national-survey-of-nuclear-power-plant-neighbors>

significant improvements in construction from Unit 3 to Unit 4 at Georgia's Vogtle Plant with a 20% reduction in cost and 30% more efficient build schedule.³ Further benefits can be expected to be realized with future builds.

The environmental benefits of nuclear power are particularly striking. NYSERDA's own analysis shows that adding just 4 GW of nuclear capacity could eliminate the need for 12 GW of intermittent generation and 5 GW of storage – a dramatic reduction in land use and material requirements.⁴ To put this in perspective, a single nuclear facility generating 1,000 MW requires approximately 1.3 square miles of land, compared to 75 square miles for an equivalent solar installation or 360 square miles for wind power. This compact footprint helps preserve our precious natural habitats, farmlands, and culturally significant areas.⁵ Our experience in community outreach has shown that public perception of nuclear power transforms when people understand modern nuclear technology's safety features and minimal environmental impact. Communities that host nuclear plants consistently show the highest levels of support – a testament to nuclear's role as a good neighbor and economic anchor. The Wayne County Board of Supervisors' unanimous vote in July 2024 supporting both the relicensing of the Ginna Nuclear Power Plant and the construction of new nuclear facilities exemplifies this local enthusiasm.⁶

While we strongly support the blueprint's thorough analysis, we believe several additional questions merit consideration as NYSERDA moves forward:

- *Regional Market Integration:* How can New York coordinate with neighboring states to create shared market structures and planning processes for advanced nuclear deployment? While the blueprint explores federal incentives, it could examine mechanisms for regional cost-sharing, shared capacity markets, and coordinated deployment schedules to achieve economies of scale.
- *Industrial Cluster Development:* What specific policy frameworks and incentives could enable the strategic co-location of advanced nuclear facilities with energy-intensive industries? While the blueprint mentions process heat applications, a deeper examination of how to

³ <https://www.energy.gov/ne/articles/5-ways-us-nuclear-energy-industry-evolving-2024>

⁴ <https://climate.ny.gov/Resources/-/media/project/climate/files/Appendix-G.pdf>

⁵ <https://ourworldindata.org/land-use-per-energy-source>

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https://www.ftimes.com/news/wayne-county-board-of-supervisors-push-for-new-nuclear-facility/article_283b3a2a-443f-11ef-8f49-c760c57e9372.html

create clean energy industrial hubs could maximize economic benefits while minimizing new transmission requirements.

- *State-Level Innovation Financing:* Beyond federal incentives, what New York-specific financing tools could accelerate nuclear deployment while protecting ratepayers? We recommend exploring state green bonds, public-private partnerships, and rate structures that could provide predictable returns while ensuring energy remains affordable.

The greatest threat to New York's clean energy future is not taking bold action now. Half of the states in the U.S. are already studying or planning deployment of advanced nuclear, and twenty-two nations have committed to tripling nuclear capacity by 2050.⁷ New York's leadership in finance, technology, and environmental protection makes it uniquely positioned to accelerate this clean energy transition.

NYSERDA's Draft Blueprint represents more than a technical document – it's a vision for how New York can maintain its economic vitality while meeting its climate commitments. The International Monetary Fund has found that nuclear power creates the largest economic multiplier effect of any energy technology.⁸ By investing in advanced nuclear, New York can meet its goal of providing 35-40% of benefits within disadvantaged communities while building a reliable, clean energy system.⁹

We stand ready to support the blueprint's implementation through our educational and advocacy work, and we look forward to helping New York lead the nation in clean energy innovation.

Thank you for your leadership in developing this forward-thinking blueprint.

Respectfully,

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⁷ <https://www.nytimes.com/2023/12/02/climate/cop28-nuclear-power.html>

⁸ <https://www.imf.org/-/media/Files/Publications/WP/2021/English/wp2021087-print-pdf.ashx>

⁹ https://www.nyserda.ny.gov/About/Newsroom/2024-Announcements/2024_01_03-DEC-and-NYSERDA-Release-Draft-Disadvantaged-Communities-Investments