



Ken Pokalsky
VICE PRESIDENT

November 7, 2024

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

Subject: Comments on “Draft Blueprint for Consideration of Advanced Nuclear Technologies”

Dear President Harris,

I am writing on behalf of The Business Council to support NYSERDA’s development and finalization of a “Blueprint for Consideration of Advanced Nuclear Technologies.” We appreciate the discussion of the draft Blueprint at September’s “Future Energy Economy Summit,” and the opportunity to review and comment on the draft document.

In working toward achievement of the CLCPA’s aggressive emission reduction and zero-emissions power mandates, we believe it is essential that New York employ an “all options” approach, and consider all viable and developing clean technologies, including advanced nuclear generation. While there are significant challenges to the deployment of additional nuclear generating capacity in New York, nuclear appears to be one of the most likely technologies to meet the essential need for “dispatchable emission free resources” to meet the CLCPA’s mandate for a zero-emission grid by 2040.

Additionally, we are encouraged by NYSERDA’s support for Public Service Commission’s (PSC) on-going investigation of potential clean technologies in support of the CLCPA’s zero-emissions grid mandate. While the PSC has not yet adopted a definition of “zero emissions” we believe that the state’s existing nuclear generation, and new advanced nuclear technologies, should be characterized and endorsed as zero-emissions resources.

Likewise, preserving New York’s existing nuclear generation should be a high priority for New York State in advancing CLCPA goals. (Unfortunately, both the state’s zero-emission energy goals and greenhouse gas (GHG) emission reduction goals took a significant hit from the unnecessary closure of Indian Point.)

Over the next several decades, the state is facing major challenges under the CLCPA. It is unlikely that the state can build sufficient wind and solar to allow for the retirement of fossil fuel generation and accommodate growing electric power demand. These trends make the retention of existing nuclear generation essential for the foreseeable future. Likewise, it is also unlikely that the state can achieve the CLPCA’s forty percent GHG emission reduction goals with its initiatives to date, including but not limited to onshore renewables, offshore wind, major new transmission, electric vehicle mandates, e-building mandates, and others.

Therefore, accommodating economic growth – and providing adequate and affordable energy to support that growth -- under an increasingly stringent statewide GHG cap will become increasingly difficult as well.

Given those concerns, it seems that the development of reliable, dispatchable, high capacity-factor electric power generation – like advanced nuclear power -- is essential for an economically-sound CLCPA implementation.

We are aware that other entities and organizations are submitting far more detailed technical responses to the questions and issues raised in the draft Blueprint, including but not limited to Constellation Energy Generation and Nuclear New York. We greatly appreciate the detailed review and recommendations being provided by these industry experts, and we strongly encourage NYSERDA to work with industry experts and other stakeholders in developing a final Blueprint that provides the state with a realistic, technically-sound approach for evaluating and implementing advanced nuclear power generation.

Sincerely,

A handwritten signature in black ink on a light gray background. The signature reads "Kurt J. Pohly" in a cursive, slightly slanted script.