



November 8, 2024

New York State Energy Research & Development Authority  
17 Columbia Circle  
Albany, New York 12203-6399

**Re: Blueprint for Consideration of Advanced Nuclear Technologies**

Dear New York State Energy Research & Development Authority and Governor Hochul,

New York Energy & Climate Advocates (NYECA) is a non-profit, volunteer-based organization comprised of scientists, engineers, environmentalists, and advocates for social justice who understand the reality of climate change and the moral imperative for timely action, employing effective solutions that work in the real world.

Our organization has been an active participant in state proceedings affecting climate and energy policy since 2020. We have provided technical comments to the state Climate Action Council, the Public Service Commission, NYSERDA, and the New York Power Authority. We have spoken with legislators, testified before legislative committees, and communicated with the Governor's office and agencies. We also engage local governments, trade groups, industry, business, and communities. On September 5<sup>th</sup> we attended the Governor's Future Energy Economy Summit in Syracuse.

Today, we submit comments jointly with *Nuclear New York* and the nationally-recognized organization *Mother for Nuclear* on NYSERDA's draft *Blueprint for Consideration of Advanced Nuclear Technologies*. It has been a privilege to contribute to that filing. We also appreciate the opportunity to provide these additional thoughts.

Governor Hochul deserves tremendous credit for suggesting that New York include Advanced Nuclear Power in its energy portfolio and encouraging policy-makers to rethink the state's decarbonization strategy.

Renewables like solar and wind have a role to play in decarbonization, but they are not enough. Moreover, the system-level challenges and costs of intermittency become increasingly pronounced as more are deployed. The New York Independent System Operator has already warned of dwindling reliability margins as the state tries to replace dispatchable fossil fuels with intermittent sources. Business and labor organizations have also expressed deep concern about harm to the state's economy and workforce if New York does not have access to abundant, reliable energy to support high-demand loads in the age of AI. It is now apparent that New York will miss its 70% by 2030 renewable target. More importantly, however, it is clear that without "firm" generation from advanced nuclear, achieving a carbon-free grid will become impossible, fossil fuel power plants will continue to operate, and the state will fail to attain its greenhouse gas reduction goals.

On the other hand, by investing in advance nuclear technology, New York can decarbonize even as electricity demand doubles or triples in the decades ahead. Capable of generate 24/7 baseload power or dispatched in response to demand, advanced nuclear offers the reliable, abundant electricity (or process heat) that high-tech industry, manufacturing, data centers, and business will need to thrive. By assuming a leadership role in the deployment of advanced nuclear technology, New York can deliver on its climate promises while positioning itself as an engine for economic growth, workforce development, and innovation in the region.

Importantly, because of its very high energy density, nuclear power provides the greatest opportunity to protect natural resources. It has the lowest lifecycle emissions, the smallest physical footprint, and the least reliance upon

mined materials of any energy source. Fast reactors will even be able to recycle spent fuel from today's power plants. Because of its compact footprint, nuclear power is key to conserving farmland and forests, protecting wildlife including endangered species, and maintaining the integrity of ecosystems.

Relating to this, we would add that advanced nuclear power provides an alternative to the intensity of large-scale solar and wind projects that have become immensely unpopular in rural New York. Rather than attempting to meet statewide demand with an extreme buildout of intermittent low-capacity-factor resources, a more diverse energy portfolio that balances high-capacity factor nuclear with intermittent renewables would be far more respectful of rural communities. Numerous analyses, including by the U.S. Department of Energy, find that such an architecture is also more feasible, reliable, and affordable.

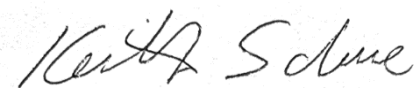
That said, we recognize that nuclear technology is often misunderstood and that ideologically-driven opponents may try to capitalize on ignorance and fear to deprive New Yorkers of the economic, climate, and environmental benefits that advance nuclear offers. In reviewing comments on the draft Blueprint and considering next steps, we urge the Governor and NYSERDA to be guided by science, facts, and reason.

Significantly, communities that host reactors are the most supportive of nuclear power because they understand the technology and witness benefits first hand. In fact, just this July, the entire Board of Town Supervisors in Wayne County adopted a resolution supporting relicensing of the Ginna nuclear plant and expressing the desire to be at the forefront of new nuclear builds.<sup>1</sup> Importantly, nuclear power offers the highest-wages and most unionized jobs within the energy sector. It is "Made in America" and loved by labor.

Other states are already exploring how advanced nuclear power can grow their economies. To not be left behind, New York should maintain momentum from the summit in Syracuse. We recommend that the Governor appoint a technical working group—similar to what has been done in Texas and other states—composed of experts in the nuclear industry itself, the state electric grid, material science, regulation, and finance to prepare a detailed report on strategies and opportunities. We urge the State to develop programs and incentives for new nuclear, as it has done for other carbon-free energy, and to engage state agencies and authorities that in the past were instrumental in developing nuclear. We also recommend creating a multi-state consortium through which information can be shared and regional planning can commence. These are things that should happen immediately so that future policy decisions can be informed by sound analysis rather than conjecture.

We again wish to commend the Governor and NYSERDA for leadership in advancing this climate and economic initiative, and we pledge our support in helping to bring reliable, clean, and abundant energy to the state.

Sincerely,



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CC: The Honorable Governor Kathy Hochul

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<sup>1</sup> S. Buchiere, *Wayne County Board of Supervisors push for new nuclear facility*, Finger Lakes Times, July 19, 2024.  
[https://www.fltimes.com/news/wayne-county-board-of-supervisors-push-for-new-nuclear-facility/article\\_283b3a2a-443f-11ef-8f49-c760c57e9372.html](https://www.fltimes.com/news/wayne-county-board-of-supervisors-push-for-new-nuclear-facility/article_283b3a2a-443f-11ef-8f49-c760c57e9372.html)