



INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS
ORGANIZED JUNE 26, 1915

Affiliated with
NEW YORK STATE A.F.L.-C.I.O.
NEW YORK STATE BUILDING TRADES COUNCIL

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COMMENTS:

Draft Blueprint for Consideration of Advanced Nuclear Technologies

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Please accept this comment on behalf of the New York State Association of Electrical Worker's – Construction Business Managers, representing the International Brotherhood of Electrical Workers locals listed below, regarding the authority's Draft Blueprint for Consideration of Advanced Nuclear Technologies (Blueprint). We are in full support of moving forward with developing Advanced Nuclear Technologies in New York State. Given the unique challenges of developing these facilities, it is essential for New York to work swiftly and methodically to ensure this technology can be utilized to address expected generation needs as we work to meet the goals in Climate Leadership and Community Protection Act (CLCPA).

With Advanced Nuclear Technology nearing readiness for commercialization, New York should work quickly to make commitments to projects and adopt strong labor and supply chain standards. This will ensure we send clear signals to the industry that the state is serious – and provide the time necessary for the industry to meet our expectations. These actions would also galvanize widespread support for this initiative by addressing key policy concerns at the outset. We would recommend that the Blueprint include advanced nuclear generation goals and timelines that explicitly integrate its planning and development into the larger plan to meet the CLCPA's goals. Additionally, the Blueprint should anticipate that labor and supply chain standards, similar to those for other renewable energy systems, will be enacted to cover these projects. The Blueprint could then include the evaluation of the positive impacts of that policy decision on the domestic supply chain and workforce development.

The Blueprint should also include stronger commitments that can strengthen and grow New York's economy. A strong and growing economy is essential to finance the construction and ongoing operation of these facilities. Our existing nuclear operators are likely partners in developing and operating Advanced Nuclear Technologies. Legacy facilities' continued role in our energy portfolio must be unquestioned and their safety, reliability, operational history and outsized role in our state's energy generation portfolio should be better highlighted. More attention should also be given to existing industries in the state that could benefit from and assist in the development of this technology. Advanced Nuclear Technology will be a solution many businesses need in order to comply with the CLCPA. The Blueprint should make it a priority to match generation with business need to provide the private sector a measure of optimism needed to retain jobs in New York. A greater focus on meeting business energy needs will be a powerful statement for perspective businesses as well. Further, a commitment to focus siting of these facilities in areas with underutilized infrastructure assets or those with recent upgrades can drive new economic investment in an efficient and cost effect manner.

Now is the time for New York to integrate Advanced Nuclear Technology into our energy future. The Blueprint can provide a clearer vision and detail that will have positive impacts on the entire process. Thank you for your consideration of our recommendations and we are eager to work together to ensure this technology provides the safe, reliable and affordable energy New York needs to strengthen our economy while meeting the goals of the CLCPA.

- Local 3 (New York City, Westchester-Fairfield) • Local 236 (Schenectady, Troy, Albany) • Local 910 (Watertown) • Local 43 (Syracuse)
- Local 86 (Rochester) • Local 41 (Buffalo) • Local 237 (Niagara Falls) • Local 25 (Nassau/Suffolk)
- Local 363 (Rockland, Orange, Dutchess, Sullivan, Ulster) • Local 139 (Elmira) • Local 325 (Binghamton) • Local 241 (Ithaca)
- Local 1249 (East Syracuse) • Local 106 (Jamestown) • Local 840 (Geneva)