



November 8, 2024

Doreen Harris, President and CEO
New York State Energy Research & Development Authority
17 Columbia Circle
Albany, NY 12203-6399

Dear President Harris,

We submit these comments, jointly, in general support of advanced nuclear technologies on behalf of the New York State AFL-CIO (“NYS AFL-CIO”) and New York State Building & Construction Trades Council (“NYSBCTC”).

The NYS AFL-CIO is a federation of 3,000 affiliated public sector, private sector, and building trades unions throughout the state, representing 2.5 million members, retirees and their families. NYSBCTC includes 14 local building trades councils, 12 district councils and state associations, and 135 local unions representing over 230,000 unionized construction workers throughout the State of New York. Collectively our members live and work in every community in New York and reflect the diversity that makes this State great.

We have consistently noted that we support the various goals of the Climate Leadership and Community Protection Act (“CLCPA”). We want to see renewable energy projects built as fast and efficiently as possible, buildings retrofitted to provide a friendlier carbon footprint, and the State’s grid modernized to better handle the inevitable electrical demand that this new economy will call for; all with requirements to ensure appropriate wage and job protections.

However, none of this is practical or affordable if the State is not making common sense plans for a thoughtful transition to a grid that includes dispatchable generation resources. We are encouraged by NYSERDA’s Draft Blueprint for Consideration of Advanced Nuclear Technologies, with the following points:

General Support with Labor Standards Caveat

First, this technology has a zero emissions profile. Additionally, we view its land use and modularity benefit potential as being able to support large industry and jobs in New York that might otherwise leave if this energy was not made available. This, of course, assumes a smart and timely transition is afforded for the existing grid resources currently being utilized by such industries.

Any process that moves forward with siting new nuclear technologies would need to have statutory labor standards included for our organizations and affiliates to lend their support. Therefore, legislation would be needed, similar to what has been provided for renewable energy development and enshrined in New York State Labor Law §224-d and Public Service Law §66-r. We could then account for wage protections; the operations and maintenance of these technologies; workforce and training needs; and best efforts to ensure that the manufacturing of these prefabricated parts benefits American workers.

Existing Nuclear Facilities

Preserving New York's existing nuclear facilities in conjunction with the exploration of advanced nuclear technologies is an extremely high priority for our organizations. The existing nuclear fleet is important to many of our affiliates and it provides reliable prevailing wage employment. This stable working environment enables our members to live and raise their families in New York State. The Climate Action Council's Scoping Plan assumes New York's upstate nuclear fleet will be granted license extensions to operate an additional 20 years. It also recommends the State evaluate the role of existing and advanced nuclear facilities prior to the scheduled conclusion of the Zero Emissions Credit program in 2029 while recognizing the time required to relicense and refuel these facilities.

We should ensure existing nuclear facilities have the support necessary to remain environmental and economic engines while also considering new policy mechanisms to incentivize new, advanced nuclear technologies.

Supply Chain

As alluded to in Section 4.4.2, because advanced nuclear is a nascent technology, it is imperative that the State make every effort to support and foster supply chain development in New York and the United States. As we have discussed in other areas of supply chain development for new technologies, project and procurement commitments are critical to building out the supply chain. Manufacturers are unlikely to invest in their ability to manufacture components unless they have buyers. In addition to securing commitments, the State should support the development of the supply chain in New York through grants to manufacturers, similar to those available for offshore wind. The State should also collaborate with the federal government and its contractors to better understand advanced nuclear technologies and, where possible, facilitate commitments to help advance the technology.

For example, Centrus Energy and its subsidiary American Centrifuge Operating, LLC have recently won awards from the United States Department of Energy (DOE) for upwards of \$2 million to expand the commercial production of High-Assay, Low-Enriched Uranium (HALEU) and deconvert HALEU from uranium hexafluoride to uranium oxide and/or uranium metal forms. The total amount of the awards will be contingent upon task orders issued by the DOE to Centrus and ACO. The United Steelworkers (USW) represent workers at the Centrus facility in Piketon, Ohio, the facility responsible, in part, for enriching uranium. The State should work in

conjunction with Centrus and ACO to solidify projects, and expand on technological opportunities related to these atomic energy grants.

Additionally, to ensure that the State's efforts result in good union jobs, statutory labor standards mentioned above must extend to the supply chain.

As always, we stand ready to work with you to ensure that New York meets and exceeds its emissions reduction goals while creating and preserving good union jobs.

Sincerely,



Mario Cilento
President, New York State AFL-CIO



Gary LaBarbera
President, New York State Building and
Construction Trades Council