



**Manufacturers Association of Central New York & The Manufacturers Alliance
Comments on the Draft Blueprint for Consideration of Advanced Nuclear Technologies
October 25, 2024**

MACNY, the Manufacturers Association, is a trade association representing more than 300 companies employing over 100,000 Central and Upstate New York residents across more than 25 counties, and the Manufacturers Alliance of New York is a group of seven regional manufacturing associations across the state. Collectively, the Alliance represents over 5,400 manufacturers and businesses which support over 181,300 manufacturing jobs. Our mission is to advance policies that will enable the growth and development of the manufacturing sector in New York, which is the backbone of communities across the state.

The long-term viability of New York's manufacturing sector is dependent on reliable and reasonably priced energy supply. As the State pursues a transition to a decarbonized economy, companies are monitoring the projected energy availability and costs associated with doing business and making new investments in New York. Therefore, it is extremely concerning that the New York Independent System Operator (NYISO) continues to find a shrinking reliability margin. This is in addition to projections that New York will need to build 25-40 GW of new dispatchable emissions free resources (DEFERs) by 2040 to meet our energy needs. To be clear, without swift action to meet the projected energy demands New York's economy will require, in-state manufacturing will not thrive. Communities that desperately need revitalization and investments will be the ones to pay the price of inaction.

With this challenging reality in front of the State, MACNY and the Alliance strongly applaud the Governor and the administration for laying the ground work to explore the build out of nuclear and other emerging technologies. This was demonstrated last year with the Public Service Commission opening a proceeding to explore what technologies will be needed to reach the 2040 Climate Leadership and Community Protection Act (CLCPA) goals. The recent release of New York's Draft Nuclear Blueprint builds on those efforts and sends a clear message to New York's manufacturing community that the State is serious about ensuring energy reliability for all New Yorkers.

As New York advances new nuclear technologies, it is imperative that a strong educational campaign is conducted to highlight the benefits of nuclear energy. This outreach should emphasize the critical role nuclear energy will have in achieving the state's climate goals and detail safety and reliability factors related to nuclear technologies. The State should partner with private developers, universities, associations, labor groups and community organizations to do this outreach. Additionally, the State should leverage partnerships at the federal level and other jurisdictions who have extensive expertise in the area. These relationships can offer technical and procedural assistance in deploying these technologies. In other words, New York does not need to go at this alone.

New York should also make efforts to fast-track siting of facilities that are located close to existing transmission infrastructure. This will allow new development to avoid additional costs and siting delays associated with transmission upgrades. Furthermore, the State must find creative measures to accelerate permitting in a responsible manner. While we are entirely supportive of permitting steps that must be taken to ensure the buildout of safe facilities that meet the requirements of state and federal regulators, if there are areas of opportunity to enhance permitting time, those should be explored. We note that this was the case as the State increased its procurement of land-based renewables with the creation of the Office of Renewable Energy Siting. In exploring which technologies to pursue, the State should strike a balance between doubling down on systems that are ready to deploy today and will meet the needs to the state within the next decade, while also providing support to technologies still in development. Close collaboration with possible developers is needed to entirely understand which technologies can be deployed as soon as possible and which ones need more time.

MACNY and the Manufacturers Alliance appreciate the opportunity to comment on the Draft Blueprint. As the State reviews these comments, we welcome the opportunity to continue a dialogue on how to best advance New York's energy goals in a manner that will lead to New York reaching its climate goals while continuing the revitalization of the manufacturing industry.

Sincerely,

Randy Wolken
President and CEO
Manufacturers Association of Central New York & The Manufacturers Alliance