



Nuclear New York

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Public Comment on the NYPA Renewables Draft Strategic Plan

On behalf of Nuclear New York, an independent, non-partisan advocacy group dedicated to achieving a prosperous, decarbonized future while conserving nature, we appreciate the opportunity to provide comments on the Public Comment Draft of the NYPA Renewables Strategic Plan.

NYPA has long exemplified innovation and reliability in energy. Its legacy—spanning hydropower at Niagara Falls and the St. Lawrence River, the Blenheim-Gilboa pumped storage facility, and critical transmission projects—reflects the pioneering spirit that defines New York. NYPA has consistently succeeded where the market has fallen short, playing a vital role in advancing the public interest.

However, as NYPA expands into renewable energy development, it is important to ask: is this the best use of its unique strengths? Wind and solar projects typically do not face significant barriers to private investment, benefiting from short project timelines, federal tax credits, NYSERDA incentives, and favorable permitting processes. Redirecting NYPA's resources toward these projects' risks diluting its capacity to address challenges that private actors are less equipped to handle.

During recent oral hearings, proponents of an aggressive renewables-only strategy urged NYPA to rapidly develop 15 GW of renewable energy to prevent a climate disaster. This perspective is misleading. While reducing global emissions is essential to mitigate the most severe consequences of climate change, this challenge is fundamentally *technology neutral*.

New York's greatest opportunity for leadership lies in setting an example that other states and nations are willing—and able—to follow. The state must pursue system-wide decarbonization that fosters economic growth and attracts investment, rather than adopting policies that risk economic contraction and diminished prosperity for New York families.

True climate leadership means charting a practical, scalable path that others can emulate. Only by achieving broad adoption of these strategies can New York's local investments contribute meaningfully to global emissions reductions—and only global reductions will effectively mitigate climate change risks.

The growing reliance on intermittent wind and solar energy raises significant challenges. Upstate communities, which are predominantly tasked with hosting expansive renewable projects, are already voicing concerns about their environmental and social impacts. Yet, despite substantial investments, these technologies have achieved only incremental decarbonization, with much more land-intensive infrastructure and unpopular transmission lines needed to meet future goals.

Moreover, as New York attracts industries like advanced manufacturing and data centers, reliable, round-the-clock electricity becomes critical. Dependence on intermittent energy sources creates gaps between supply and demand that undermine these ambitions.

At the Public Service Commission's zero-emission technical conference in December 2023, nuclear energy emerged as the most promising solution for stabilizing the grid while meeting decarbonization targets. Our studies suggested that at least 23 GW of firm dispatchable resources will be needed to fill the gap left by the State's current plan. Research by Professor Lindsay Anderson of Cornell University, which took into account transmission barriers the State's plan would face, highlighted the need for up to 40 GW of dispatchable, emission-free capacity to fully decarbonize the State—even if New York meets ambitious wind and solar targets suggested by the Climate Action Council. Advanced nuclear energy instead could serve as the backbone of New York's energy future, enabling the State to scale back wind and solar deployment, conserve land, and reduce costs, all while respecting community concerns.

Unlike wind and solar, which impose significant costs for transmission, storage, backup, and reliance on foreign supply chains from China and elsewhere, nuclear energy offers unparalleled reliability, efficiency, and longevity. With lifespans exceeding 80 years, nuclear power plants provide enduring value. Yet, their high upfront costs often deter private investment, despite their long-term benefits.

NYPA's unique strengths position it to make a transformative impact on New York's energy future. With the capacity to bridge this investment gap, NYPA can champion advanced nuclear projects that deliver long-term reliability and sustainability. While the Build Public Renewables Act authorized NYPA to invest in renewables, its mandate to support nuclear energy dates back to 1968. Notably, one of New York's three remaining operational nuclear facilities, the James A. FitzPatrick plant, is named after a former NYPA Chairman. Given the urgent need for dispatchable, emission-free resources, nuclear energy must be a central focus of NYPA's strategy.

Recent successes in attracting advanced microchip manufacturing to New York underscore the urgency of building a reliable and resilient energy system. Wind and solar alone cannot meet the demands of these industries. Without dependable energy infrastructure, New York risks squandering this economic opportunity.

NYPA has a proud history of advancing nuclear energy, providing reliable and affordable electricity that continues to benefit New Yorkers. By returning to its roots and championing advanced nuclear energy, NYPA can secure New York's energy future, support economic growth, and set a global standard for effective decarbonization.

Let's position NYPA as a driver of innovation and resilience—an organization that tackles our greatest challenges with solutions that endure. Together, we can build a sustainable, reliable energy system that serves all New Yorkers.

Respectfully,

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