

*Comments from Vote Solar and Solar United Neighbors on the Draft Blueprint for Consideration of Advanced Nuclear Technologies*

We appreciate the opportunity to provide comments on the Draft Blueprint for Consideration of Advanced Nuclear Technologies. As advocates at leading distributed solar organizations, we wish to share two primary concerns about the Blueprint.

**First, the Blueprint does not adequately account for the serious and documented risks associated with developing new nuclear resources.**

Distributed energy resources (DERs) offer a far more viable path forward than new nuclear energy, as they are faster, cheaper, and easier to implement. While new nuclear may appear appealing due to its potential for large-scale carbon-free generation, it is a high-risk option. The safety risks associated with nuclear are well-documented, imperiling nearby communities, posing catastrophic consequences in case of accidents, and generating hazardous waste. It must also be stated that New York's Indigenous communities, on whose land projects would be sited, are vehemently opposed to such projects.<sup>1</sup> Nuclear projects are notorious for delays, cost overruns, and regulatory hurdles, making them an uncertain investment of time and resources. In contrast, DERs—such as solar, thermal energy networks, and battery storage—can safely be deployed quickly, scaled efficiently, and deliver immediate carbon reductions.

We recognize the role that existing nuclear plants can play in maintaining carbon-free generation in the interim, while we work to build out the solar, wind, and storage needed to meet our climate goals. We are indifferent to the continued operation of current nuclear facilities during this transition, as long as they are safe and cost-effective. However, we do not support the development of new nuclear. Given the high costs, long timelines, and risks associated with nuclear expansion, it would be a distraction from the immediate and scalable solutions we need to accelerate the clean energy transition.

**Second, the Blueprint references the economic potential of nuclear while ignoring the faster, safer, and more reliable economic benefits of DERs.**

The serious and long-term costs associated with new nuclear technologies significantly weigh down any projected economic benefits. In contrast, DERs present a major opportunity for economic development in both the short and long terms – saving the state \$28 billion over the next 30 years, while improving resilience in overburdened communities and creating tens of thousands of good-paying jobs.<sup>2</sup>

---

<sup>1</sup>

<https://www.foodandwaterwatch.org/2024/09/05/153-groups-and-onondaga-nation-allies-tell-gov-hochul-no-nuclear-follow-ny-climate-law/>

<sup>2</sup> [https://vibrantcleanenergy.com/wp-content/uploads/2021/10/VCE-VS-NY\\_Final.pdf](https://vibrantcleanenergy.com/wp-content/uploads/2021/10/VCE-VS-NY_Final.pdf)

Pursuing new nuclear generation risks diverting attention and funding away from more effective and proven solutions that are already driving the clean energy transition. By focusing instead on DERs, we can meet climate targets faster, reduce costs, and avoid the pitfalls of nuclear development. We have proven and reliable energy solutions at our disposal, and we need to be investing our resources into bringing them to scale. DERs like solar and thermal energy networks – along with battery storage, energy efficiency upgrades, and demand response – are the way forward. We urge the State to focus on these solutions and to prioritize their deployment in ways that serve disadvantaged communities.

Respectfully Submitted,

Lindsay Griffin  
Regulatory Director, Northeast  
Vote Solar  
[lgriffin@votesolar.org](mailto:lgriffin@votesolar.org)

Elena Weissmann  
Regional Director, Northeast  
Vote Solar  
[elena@votesolar.org](mailto:elena@votesolar.org)

Glen Brand  
Vice President, Policy & Advocacy  
Solar United Neighbors  
[glen@solarunitedneighbors.org](mailto:glen@solarunitedneighbors.org)