



**New York Energy  
& Climate Advocates**

P.O. Box 811 Cooperstown, NY 13326

January 9, 2026

New York State Energy Research and Development Authority  
17 Columbia Circle  
Albany, New York 12203-6399

Submitted electronically via: [rggiprograms@nyserda.ny.gov](mailto:rggiprograms@nyserda.ny.gov)

**Re: Comments Supporting Advanced Nuclear Energy in the RGGI Operating Plan**

Dear NYSERDA Staff, Members of the NYSERDA Board, and DEC Leadership,

New York Energy & Climate Advocates (NYECA) appreciates this opportunity to provide comments on the 2026 Draft Regional Greenhouse Gas Initiative (RGGI) Operating Plan Amendment.

We are a non-profit, volunteer-based organization that understands the reality of climate change and the need for action, employing effective solutions that work in the real world. An active participant in state energy proceedings since 2020, NYECA has provided technical comments to the Climate Action Council, Public Service Commission (PSC), New York State Energy Research and Development Authority (NYSERDA), New York Power Authority (NYPA), and legislative committees. We also communicate with state and local legislators, communities, trade groups, industry, and business.

**Our organization welcomes the draft amendment's recognition of advanced nuclear energy as a resource eligible for funding under the Regional Greenhouse Gas Initiative.** New York has committed to achieving deep decarbonization while maintaining a reliable electricity system. Simultaneously meeting these two objectives will require a diverse portfolio of zero-emission technologies, including those that can operate at any time and around the clock. Advanced nuclear energy offers firm baseload or dispatchable power without greenhouse gas emissions; therefore, including it among RGGI programs is consistent with New York's climate and energy goals.

By authorizing RGGI funds for early-stage development of advanced nuclear projects under the theme of *Energy Abundance, Diversity, and Reliability*, the proposed amendment appropriately acknowledges that emerging nuclear technologies can contribute to emissions reductions, grid resilience, and long-term energy security. With the ability to generate continuous gigawatt-scale power, advanced nuclear can replace fossil fuels and meet the growing needs of business and industry for abundant clean energy.

With respect to other themes of the 2026 amendment—*affordability, energy innovation and economic development, thriving communities, and the environment*—advanced nuclear checks the boxes as well.

Nuclear energy represents a significant economic opportunity for New York. Investment in the sector can sustain high-quality jobs, strengthen domestic supply chains, and benefit economies in and around

communities that choose to host new reactors. Leveraging RGGI funding to support nuclear technology aligns climate action with workforce development and regional economic growth, ensuring the delivery abundant energy vital to business, high-tech manufacturing, and other industries. Moreover, supporting early-stage development of advanced nuclear with RGGI proceeds can help accelerate innovation while keeping New York competitive in this emerging clean energy sector.


Nuclear energy requires up-front investment, which is why partnering with the New York Power Authority is prudent. But since advanced reactors will have all of the same functionality, performance, and durability of today's synchronous fossil fuel plants, a system architecture that embraces nuclear does not require total redesign of the state's electric grid. By avoiding massive amounts of storage, excessive transmission, duplicative backup generation, and additional equipment for frequency/inertia stability, New York can forego the expense and maintenance nightmare of a Rube Goldberg grid, thus ensuring long-term affordability.

In addition to tackling climate change, investing in nuclear energy will also directly benefit the environment by conserving farmland, wildlife habitat, and natural resources. Compact nuclear power not only has the lowest lifecycle emissions of any energy source; it also has the smallest physical footprint and least demand on mined resources of any form of energy, including solar and wind. Notably a single gigawatt reactor occupying a couple hundred acres provides as much energy on an annual basis as 30,000 acres of solar panels or over 700 giant land-based wind turbines spread across hundreds of square miles.

NYECA applauds NYSERDA and DEC for proposing a technologically diverse approach to greenhouse gas reduction that prioritizes reliability and system-level efficiency. We urge the state to include advanced nuclear energy among RGGI-supported programs.

Thank you for your leadership and for considering these comments. We look forward to continued engagement as New York transitions to a reliable and affordable low-carbon energy future.

Sincerely,

A handwritten signature in black ink that reads "Keith Schue". The signature is written in a cursive, slightly slanted style.

Keith Schue  
New York Energy & Climate Advocates  
keithschue@gmail.com  
407-470-9433