



## Nuclear New York

Independent Advocates for Reliable Carbon-Free Energy  
3961 47<sup>th</sup> St, Sunnyside, NY 11104  
[NuclearNY.org](http://NuclearNY.org) | [info@NuclearNY.org](mailto:info@NuclearNY.org)

April 21, 2025

Hon. Michelle L. Phillips, Secretary  
NYS Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223-1350

**Re: Public comments on Clean Path Transmission Project in Case 20-E-0197  
Petition Requesting Designation of Certain Transmission Investments**

Dear Public Service Commission,

On behalf of Nuclear New York, we appreciate the opportunity to provide comments on the petition seeking Priority Transmission Project status for the Clean Path Transmission Project.

Nuclear New York is an independent, non-partisan, non-profit organization working for a prosperous decarbonized future and nature conservation. Our mission is to advocate for the peaceful use of nuclear technology to meet society's need for reliable, emission-free energy and provide well-paid meaningful jobs that underwrite vibrant, healthy communities. We conduct research and educational activities in New York and beyond.

Our organization supports the designation of Clean Path as a Priority Transmission Project. However, we would encourage the Commission to consider benefits and opportunities beyond those discussed in the petition. Although occasionally referring to the value of providing electricity from upstate "renewable and carbon-free" resources to New York City, the petition and accompanying analysis focuses only on "renewable energy" while citing figures reflecting large-scale expansions of intermittent solar and wind.

We recognize that delivery of electricity downstate from solar, wind, and hydropower would be enabled by the 1,300 MW Clean Path transmission project. However, development of the transmission corridor would also enable delivery of electricity from other carbon-free resources, including existing and advanced nuclear power.

We note that the previous "Clean Path New York" concept was specifically structured and financed together with about two dozen wind and solar projects, making use of the Blenheim-Gilboa pumped storage facility to deliver an estimated 7.9 million MWh of electricity downstate annually at an average capacity utilization rate of 69%. However, the new petition is for a

stand-alone transmission project built with NYPA support. As such, this creates greater flexibility to determine the best mix of resources—intermittent generation, pumped storage, and “firm” baseload or dispatchable power— to potentially deliver *more* than 7.9 million MWh of carbon-free energy downstate. A resource-agnostic configuration, enabled by an independent Clean Path Transmission Project as structured in the new petition, could substantially enhance system-level flexibility, efficiency, and reliability.

This is also entirely consistent with action taken by the Governor and NYSERDA to develop a more diverse, reliable, and resilient energy portfolio that expands not only intermittent solar and wind, but also reliable nuclear power. By including advanced nuclear in future energy plans, New York can avoid NYPA’s “lower bound” scenario in which a zero-emission grid is not achieved anytime in its 2052 modelled horizon.

Nuclear has the smallest physical footprint, the least life-cycle emissions, and least reliance on mined resources of any energy source. By pursuing a more balanced energy portfolio—one that recognizes the value and unique attributes of compact carbon-free nuclear power—New York can decarbonize its electric grid, protect nature, and create abundant, reliable energy essential to economic prosperity.

It is with this bright future in mind that we support the Clean Path petition.

Respectfully,

/s/ Dietmar Detering  
Dietmar Detering, Chair  
Nuclear New York  
[dietmar@nuclearny.org](mailto:dietmar@nuclearny.org)

/s/ Eric Scott Dawson  
Eric Scott Dawson, Vice Chair  
Nuclear New York  
[eric@nuclearny.org](mailto:eric@nuclearny.org)