

Nuclear Power is NOT Clean Energy and should not be included in New York's Clean Energy Standard

As part of its Reforming the Energy Vision (REV) proceedings, the NYS Public Service Commission has proposed a set of Clean Energy Standards. Tier 1 and Tier 2 of the proposed Clean Energy Standard will ensure that utilities and other energy companies purchase new and existing renewable energy resources, and should be strongly supported. However, the inclusion of subsidies for aging nuclear reactors as proposed in Tier 3 of the Clean Energy Standard is inappropriate and should be just as strongly opposed. The PSC's rationale for including the Tier 3 nuclear subsidies is the unsupported assumption that New York cannot meet its 2030 greenhouse-gas reduction goals if the financially-unsustainable upstate nuclear plants are allowed to close. This contradicts many analyses done by scientists showing that we can meet aggressive greenhouse gas reduction targets, while closing nuclear reactors. Rather than making rate-payers bail out these dangerous and unprofitable facilities, which owners Entergy and Exelon want to close, the estimated \$3.5 billion in subsidies should be invested truly clean energy: wind, including off-shore wind, hydroelectric, tidal, community- and utility-scale solar, storage and energy efficiency.

Nuclear energy is NOT clean or carbon-free. While it is true that nuclear reactors do not emit carbon dioxide at the point of power generation, the nuclear fuel chain is responsible for carbon emissions during mining, milling, enriching, construction, transportation, and decommissioning. From cradle to grave, nuclear reactors pollute the environment and threaten human health and safety. After mining, milling generates vast amounts of radioactive and toxic tailings that are deposited on the ground or in open ponds. Approximately 25,000 pounds of mining waste (rock, mill tailings, and depleted uranium) are generated for each pound of nuclear fuel delivered to New York's reactors. The nuclear fuel is then enriched in an energy-intensive process. The nuclear life cycle is extremely dangerous to human health. Uranium fuel is mined in or near indigenous communities and communities of color. During power generation, nuclear plants routinely and accidentally release radioactive isotopes to air and water, including newly-generated radioactive carbon, C-14, which results from nuclear fission. The so-called "spent" nuclear fuel rods, which leave the reactor, are approximately one million times more radioactive than when they entered, and must be stored on-site indefinitely, with inadequate decommissioning plans or funds to ensure that this is done safely. The Nuclear Regulatory Commission's legal limit for radiation exposure to the public from the routine operation of a reactor is 100 millirems per year – a dose rate which the agency itself believes will result in one additional cancer fatality per 286 people exposed. There is no safe level of radiation exposure. Subsidizing nuclear power will also increase the amount of highly radioactive fuel rods that each host community will have to store over time.

Bailing out nuclear reactors is a form of corporate welfare subsidized by ratepayers: Under Tier 3 of the proposed Clean Energy Standard, by 2020, nuclear power would become the most heavily subsidized energy source in New York – a cost that would have to be paid by ratepayers. The Nuclear Information and Resource Service projects that these subsidies will cost approximately \$3.5 billion (based on losses reported at some of the reactors). These subsidies would benefit the Exelon Corporation, which owns Ginna and Nine Mile Point, and the Entergy Corporation, which has already announced plans to retire its FitzPatrick reactor. These companies would merely have to show the Public Service Commission how much money they need in order to continue operating, and the cost of the subsidies would automatically be set to that amount. No other criteria would be used for setting the price of the subsidies, and there is no cost-cap proposed. This cost will be borne by local and county governments, colleges and universities, hospitals and health care facilities, large and small businesses and residential customers, including low- and moderate-income families. Further, the jobs argument is equally faulty. About half of the workers at these facilities will need to be retained during closure and decommissioning. Those who are downsized should be retrained for jobs in the emerging green energy economy through a planned and just transition. Note: Tier 3 does not apply directly to Indian Point, since it is currently fiscally profitable; it only applies to the reactors in the western part of the State, which need a subsidy to continue operating profitably. Needless to say, Entergy is appealing the exclusion of Indian Point from Tier-3 payments and has said that it fully expects to be subsidized through the Clean Energy Standard.

Support for off-shore wind. New York's enormous offshore wind potential has great promise in helping New York meet its goal of 50 percent renewable energy generation by 2030. NYSERDA has already completed a well-researched environmental impact study of the potential impacts of off-shore wind on the marine ecology and has given this technology a clear green light. The cancellation of the proposed liquid natural gas export facility at Port Ambrose removed an important obstacle. The Clean Energy Standard Tier 3 should be dedicated to accelerating the development of off-shore wind, not to subsidizing nuclear power.

Set aggressive energy efficiency goals. The Clean Energy Standard proposal assumes a very modest decrease in electricity demand due to energy efficiency, but does not mandate that utilities invest in energy efficiency retrofits.

Energy efficiency is a key component of a low-carbon energy future. It is the most affordable way to reduce greenhouse gas emissions and displace fossil fuel and nuclear generators.

RECs not ZECs: In summary, we encourage support for Tier 1 and Tier 2 Renewable Energy Credits (RECs) and strong opposition to Tier 3 subsidies, the so-called Zero Emission Credits (ZECs) for nuclear power, which is not emission-free, cost-effective or safe for human health and the environment. In fact, nuclear power should not be subsidized through any mechanism in New York State.

Let your voice be heard: Public comment is due **June 6, 2016**. It should be addressed to:

The Honorable Kathleen H. Burgess, Secretary
New York State Public Service Commission
Empire State Plaza, Agency Bldg. 3
Albany, NY 12223-1350

Re: Case #15-E-0302: Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard.

Your comments can be submitted electronically at:

<http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=15-e-0302>

Click on the Public Comment tab and then scroll to the button for button to post.

The PSC Staff White Paper on Clean Energy Standard is available at: <http://tinyurl.com/zn837a8>

To sign an on-line comment developed by Alliance for a Green Economy, please go to:

www.allianceforagreenconomy.org/nukes-are-not-clean

For more information, please go to: <http://cleanupthecleanenergystandard.org/>

www.allianceforagreenconomy.org/sites/default/files/CES_Summary_Memo_0.pdf

Equally important, please attend an upcoming Public Hearing on the Clean Energy Standard near you:

All hearings, except where noted, will be held twice at each location: 2:00pm - Information Session; 3:00pm - Public Statement Hearing, and 6:00pm - Information Session; 7:00pm - Public Statement Hearing

Tues., May 10, Binghamton City Hall, 38 Hawley St., Binghamton, NY 13901

Weds., May 11, Buffalo/Amherst: Harlem Road Community Center; 4255 Harlem Rd., Amherst, NY 14226

Thurs., May 12, Rochester: Chili Town Hall; 3333 Chili Ave., Rochester, NY 14624

Tues., May 17, Albany: Colonie Town Hall, 534 New Loudon Rd., Latham, NY 12110:

2:00pm - Information Session; 3:00pm - Public Statement Hearing;

Evening session: Albany Law School; East Wing School, Room E211, 80 New Scotland Ave., Albany, NY 12208

6:00pm - Information Session; 7:00pm - Public Statement Hearing

Tues., May 17: Suffolk County Legislative Building, Evans Griffing Building, 300 Center Dr., Riverhead, NY 11901.

12:30pm - Information Session; 1:30pm - 3:30pm – Public Hearing;

6:00pm - Information Session; 7:00pm - Public Statement Hearing

Weds., May 18, Plattsburgh: Town Hall, 151 Banker Rd., Plattsburgh, NY 12901

Weds., May 18, Rockaway: Knights of Columbus, 333 Beach 90th Street, Rockaway Beach, NY 11693

Weds, May 18, Nassau County Legislative Building, 1550 Franklin Ave, Mineola, NY 11501

6:00pm - Information Session; 7:00pm - Public Statement Hearing (no afternoon session)

Tues., May 24, Oswego City Hall, 13 West Oneida St., Oswego, NY 13126

Weds., May 25, Syracuse: Carman Community Room, Liverpool Public Library, 310 Tulip St., Liverpool, NY 13088

Thurs., May 26, Kingston City Hall; Council Chambers, 2nd Floor; 420 Broadway, Kingston, NY 12401

Tues., May 31, New York City: NY State Public Service Commission Boardroom, 4th Floor, 90 Church St., NY, NY 10007