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Comment Received From: Keith Schue
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Support the Continued Safe Operation of Diablo Canyon Nuclear Power Plant Beyond 2025

Additional submitted attachment is included below.

New York Energy and Climate Advocates
310 W. 86th St. #6B, New York, NY 10024

August 12, 2022

California Energy Commission
Docket Unit, MS-4
Docket No. 21-ESR-01
715 P Street
Sacramento, California 95814

RE: Support the Continued Safe Operation of Diablo Canyon Nuclear Power Plant Beyond 2025; 21-ESR-01

Dear members of the California Energy Commission,

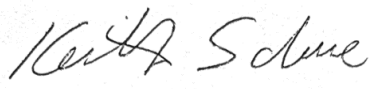
New York Energy and Climate Advocates is a non-profit, volunteer-based organization of scientists, engineers, environmentalists, business professionals, and advocates for social justice who understand the reality of climate change and the moral imperative for timely action employing solutions that work in the real world. To help meet national climate objectives while ensuring the provision of reliable electricity, we strongly urge you to support the continued operation of the Diablo Canyon Nuclear Power Plant beyond 2025.

Like California, New York has set aggressive greenhouse gas reduction goals and is embarking upon efforts to expand the use of renewable energy. Likewise, nuclear has received a certain amount of resistance in our state. Unfortunately, the result of these conflicting priorities has meant limited progress on greenhouse gas reduction. Most recently, downstate New York lost over two gigawatts of carbon-free baseload electricity when our Indian Point nuclear plant was decommissioned—largely due to the misguided efforts of a former governor who has resigned from office. Since its closure, fossil fuel combustion from the electricity sector has increased, resulting in more carbon emissions and air pollution. According to New York's Independent System Operator (NYISO), losing Indian Point has also contributed to reduced reliability margins and higher electric rates.[i]

In politics, modifying prior positions requires courage and a commitment to the common good. We therefore commend Governor Newsom, Senator Feinstein, and other California leaders for announcing their public support for extending the operation of Diablo Canyon. Doing so will give your state a fighting chance of achieving real climate progress and avoiding greater dependence on fossil fuels. Although the future is unwritten, we are also cautiously optimistic that attitudes about nuclear power are changing in New York. The New York Energy Research and Development Authority (NYSERDA) recently included the relicensing of all three of our remaining nuclear plants in its modeling of draft plans for the implementation of state climate legislation.[ii] A growing number of New Yorkers are calling for investments in advanced nuclear technology as well.[iii]

Notably, the International Energy Agency (IEA) finds that extending the life of existing nuclear facilities, like those in California and New York, to be the most cost-effective means of limiting carbon emissions.[iv] In addition to providing carbon-free electricity 24/7, nuclear power has among the smallest land and materials footprint of any energy source.[v] Moreover, objective statistical analyses confirm nuclear to be comparable to renewables in safety.[vi] Consistent with state environmental law and Executive Orders regarding emissions from the power sector, we urge the California Energy Commission to support the ongoing operation of Diablo Canyon.

Sincerely,



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[i] NYISO, *Power Trends 2022: The Path to a Reliable Greener Grid for New York*; the New York ISO Annual Grid and Markets Report. https://www.nyiso.com/documents/20142/2223020/2022-Power-Trends-Report.pdf

[ii] New York State Draft Scoping Plan Integration Analysis Technical Supplement, Appendix G, Annex 2: Key Drivers and Outputs, NYSERDA (updated May 2022). https://climate.ny.gov/-/media/Project/Climate/Files/IA-Tech-Supplement-Annex-2-Key-Drivers-Outputs.xlsx

[iii] Nuclear New York, https://www.nuclearny.org/ ;
see also: ecoAmerica. *Energy Attitudes: Americans Support Clean Energy*. American Climate Perspectives, Volume V 2021. https://ecoamerica.org/wp-content/uploads/2021/11/acps-2021_energy-attitudes-report.pdf

[iv] *Projected Costs of Generating Electricity 2020,* International Energy Agency, December 2020. https://www.iea.org/reports/projected-costs-of-generating-electricity-2020 ;
see also: Aborn, et al. *An Assessment of the Diablo Canyon Nuclear Plant for Zero-Carbon Electricity, Desalination, and Hydrogen* Production, Precourt Institute for Energy, Stanford, 2021. https://energy.stanford.edu/publications/assessment-diablo-canyon-nuclear-plant-zero-carbon-electricity-desalination-and

[v] *Carbon Neutrality in the UNECE Region: Integrated Lifecycle Assessment of Electricity Sources*, UN Economic Commission of Europe, March 2022 (UNECE report). https://unece.org/sites/default/files/2022-04/LCA_3_FINAL%20March%202022.pdf

[vi] Oxford, *Our World in Data* https://ourworldindata.org/nuclear-energy#what-are-the-safest-sources-of-energy