

RE: Comments of the Central and Northern New York Building & Construction Trades Council
on the Advanced Nuclear Policy Options Paper

To the Members of the New York State Department of Public Service:

On behalf of the Central and Northern New York Building & Construction Trades Council, representing 8,500 members across 17 affiliated local unions, we appreciate the opportunity to comment on the Advanced Nuclear Policy Options Paper. We support the development of a durable policy framework that advances New York's Nuclear Reliability Backbone and provides a clear pathway to move advanced nuclear projects from planning to construction.

Our regional workforce is deeply engrained with the existing nuclear industry. Nine Mile Point Units 1 and 2 and the James A. FitzPatrick plant have operated in our footprint for decades, and our members have built, maintained, and upgraded these facilities across that entire history. Central and Northern New York already has a trained, credentialed workforce that understands nuclear-grade construction, safety, and quality standards, and contractors who know how to deliver this work.

We have also made the investments needed to keep that workforce ready. Our council operates 150,000 square feet of training facilities, spends more than \$5 million annually on training, and has graduated over 1,735 apprentices into our local unions in the past decade alone.

Programs like these depend on a steady pipeline of work to sustain them. The Options Paper is right to recognize that a durable, long-term policy framework is what gives contractors and training programs the confidence to keep investing in the next generation of skilled workers.

A sustained commitment to advanced nuclear development would strengthen that pipeline for decades to come. These projects create thousands of construction jobs during the build and long-term operating positions once a facility comes online, all while generating the kind of family-supporting union careers that keep skilled workers in Central and Northern New York rather than following work elsewhere.

For these reasons, we urge the Commission to prioritize development at existing nuclear communities like ours, to support strong labor standards, including prevailing wage and project labor agreements, throughout project planning and construction, and to plan for a sustained pipeline of projects that gives our training programs and contractors the certainty to keep investing in this workforce.

The Central and Northern New York Building & Construction Trades Council respectfully urges the Department of Public Service and the Public Service Commission to adopt a policy framework that provides the long-term certainty needed to bring advanced nuclear projects to construction, and to ensure that the region already doing this work can keep doing it.

Respectfully,

Timothy Morris
Business Representative
Millwrights Local 1163
North Atlantic States Regional Council of Carpenters

Central and Northern New York Building & Construction Trades Council