



350 West 31st, Floor 8
New York, NY, 10001
info@climatejobsny.org | climatejobsny.org

VIA ELECTRONIC SUBMISSION

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

Subject: Case 26-E-0335 – Proceeding on Motion of the Commission to Implement a Nuclear Reliability Backbone.

Case 20-E-0197 - Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act.

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

Dear Secretary Phillips:

Climate Jobs New York (CJNY) respectfully submits the following comments in response to the Notice Soliciting Comments filed June 12, 2026 concerning the Public Service Commission's ("PSC" or "Commission") Order Establishing a Nuclear Reliability Backbone Process, and the accompany Advanced Nuclear Policy Options Paper ("Options Paper") jointly issued by the New York State Energy Research and Development Authority ("NYSERDA") and Staff of the Department of Public Service ("DPS").

Climate Jobs New York (CJNY) is a coalition of labor unions representing 2.6 million working people at the center of New York's economy. We are united around a shared goal of combating climate change while reversing income inequality. CJNY's mission is to advocate for a clean energy economy at the scale climate science demands, create good union jobs and support more equitable communities and a more resilient New York.

At the outset, CJNY want to be clear that if New York is to establish a carbon-free energy sector, it must rely on nuclear power. There is no other clean firm, or baseload power that can supply industrial operations at scale. Solar, wind and battery storage are essential to our energy supply in the state, but they cannot provide all of the baseload power that our state depends on. For this reason, among others, nuclear must be a key part of New York's energy future.

CJNY commends the Administration and the Commission for acting to support the development of advanced nuclear energy as part of an “all-of-the-above” approach to safely and reliably meeting the State’s growing energy needs, advancing its clean energy goals, and delivering high-quality union jobs for New Yorkers. The Nuclear Reliability Backbone (“Backbone”) process represents a generational investment in New York’s energy system and its clean energy economy, and the Coalition recognizes the importance of developing firm, baseload power alongside continued investment in and deployment of renewable energy. Whether that investment is delivered on time, on budget, and safely will depend in significant part on decisions the State makes now about workforce, labor standards, and structure of its own participation in these projects.

The Coalition’s comments center on a single proposition: a highly skilled, well-trained, and adequately scaled construction and operations workforce is foundational to the Backbone, and the tools the State is already contemplating — an integrated financial package, a proprietary financial role, and a move away from lowest-price procurement — give the State both the leeway and the obligation to secure that highly skilled and trained workforce from the outset. These comments address (I) the role of union labor in the existing fleet; (II) the workforce pipeline the Backbone will require and the timeline for building it; (III) the demonstrated benefits of project labor agreements for complex nuclear construction, labor peace agreements for operations, and the State’s ability to condition its proprietary support on labor standards; (IV) the opportunity created by the State’s role to engage workforce issues at the outset; (V) the workforce and cost advantages of a proven, mature reactor design and committed pipeline; and (VI) the necessity of a strong state coordination role paired with in-state supply chain development by highly skilled workers.

I. Union Labor is Foundational to New York’s Existing Nuclear Fleet and to the Backbone

New York’s existing nuclear fleet has benefited from the sustained work of a highly skilled union workforce. The State’s four operating reactors — R.E. Ginna, Nine Mile Point Unit 1 and 2, and James A. Fitzpatrick — together produce approximately 27.5 terawatt hours (TWh) of electricity a year, accounting for more than 20% of New York’s electricity generation and 40% of its carbon-free power.¹ These facilities have operated safely for decades, and they anchor the 3.4 GW of existing-fleet foundation on which the Backbone will be built.

The operation largely rests on a unionized workforce that leads the way on training generations of skilled tradespeople who build and operate nuclear facilities. The nuclear generation workforce is the most unionized of the energy workforces at 19%—represented by a labor union or covered under a collective bargaining agreement or a project labor agreement— compared to 11% for the overall energy workforce (as measured by the Department of Energy in 2024).²

¹ ADVANCED NUCLEAR POLICY OPTIONS PAPER, NYSERDA & DEP’T OF PUB. SERV. (2026).

² U.S. ENERGY & EMPLOYMENT REPORT 2024, U.S. DEP’T OF ENERGY 39-40 (2024), <https://www.energy.gov/documents/2024-us-energy-employment-jobs-report>.

Nuclear also tends to be higher paying than average U.S. energy sector jobs.³ The union representation is a proven contributor to the safe, reliable operation that has made the existing fleet so valuable to the State's reliable, clean capacity. The Vogtle Plant Units 3 & 4 represented the first newly constructed nuclear units to be built in the U.S. in over 30 years and was built in partnership with the North America's Building Trades Unions (NABTU).⁴ At the peak, NABTU represented 7,000 of the 9,000 workers on site. The Backbone should be built and operated on the same foundation, extending and expanding good union careers for thousands of existing and new workers.

II. The Backbone Process Requires a Deliberately Developed Workforce Pipeline

The scale of new deployment contemplated by the Backbone – 5 GW of new advanced nuclear generation in addition to the existing fleet – will require a workforce substantially larger than the one that exists today. The nuclear industry already reports difficulty sourcing qualified workers. Roughly 90% of professional and business services employers reported at least “some challenges finding qualified workers, despite leading the nuclear field in new hires. Even utilities, which employed 3 in 5 nuclear energy workers in 2023, reported hiring challenges.”⁵ Nationally, the overarching federal goal of quadrupling nuclear capacity over the next 25 years is projected to require a tripling of the nuclear workforce, according to the Department of Energy's Energy Workforce Advisory Board.⁶

Estimates vary, but a single gigawatt-scale reactor project can employ several thousand workers at the peak of construction – up to 4,500 on-site – concentrated in the building trades, with several hundred permanent operations and maintenance positions once the plant enters service.⁷

CJNY recently toured the Hinkley Point C nuclear facility that is under construction in England. The two reactors totaling 3.2GW of generation currently will employ around 15,000 construction

³ 3 *Workforce Trends in Nuclear Energy in 2025*, U.S. DEP'T OF ENERGY (Dec. 17, 2025), <https://www.energy.gov/ne/articles/3-workforce-trends-nuclear-energy-2025>.

⁴ Georgia Power, Fun Facts, [Vogtle Fun Facts: Interesting Insights | Georgia Power](https://www.georgiapower.com/newsroom/press-releases/2020/03/28/nabtu-salutes-southern-companys-vogtle-project-for-reaching-another-significant-milestone/); Press Release, North America's Building Trades Unions Salute Southern Company's Vogtle Project for Reaching Another Significant Milestone NABTU (March 28, 2020), https://nabtu.org/press_releases/north-americas-building-trades-unions-salute-southern-companys-vogtle-project-for-reaching-another-significant-milestone/.

⁵ 5 *Workforce Trends in Nuclear Energy*, U.S. DEP'T OF ENERGY (Aug. 28, 2024), <https://www.energy.gov/ne/articles/5-workforce-trends-nuclear-energy>.

⁶ *Worker shortage looms over new US nuclear power focus*, ROLL CALL (Nov. 5, 2025), <https://rollcall.com/2025/11/05/worker-shortage-looms-over-new-us-nuclear-power-focus>; see also RECOMMENDATIONS OF THE 21ST CENTURY ENERGY WORKFORCE ADVISORY BOARD, JULY 2025, U.S. DEP'T OF ENERGY (2025), https://www.energy.gov/sites/default/files/2025-07/EWAB_Special_Report_Opportunities_for_American_Workers_in_Energy.pdf.

⁷ *Quick Facts on Nuclear Industry Jobs*, Nuclear Energy Institute (n.d.), <https://www.nei.org/advantages/jobs>; see also Press Release, North America's Building Trades Unions Salute Southern Company's Vogtle Project for Reaching Another Significant Milestone NABTU (March 28, 2020), https://nabtu.org/press_releases/north-americas-building-trades-unions-salute-southern-companys-vogtle-project-for-reaching-another-significant-milestone.

and related workers on-site at the peak of construction.⁸ They are staging the construction of this facility with another 3.2GW project called Sizewell C in a different part of England to create a skills and supply chain bridge. This allows for the transfer of supply chains, contractors, and skilled workers directly from Hinkley Point C to Sizewell. It also helps that Sizewell is a near-replica project, wherein the developers can pass on specialized nuclear construction expertise, reduce costs, and avoid supply chain bottlenecks.⁹ In addition, staging these projects will create consistent work for nearly two decades for this workforce, creating stability for tens of thousands of workers.

Assembling a workforce of that size and skill requires significant planning, investment, and coordination in training. It depends on sustained investment in the registered apprenticeship and pre-apprenticeship programs of the relevant trades, which are the mechanism through which the State can grow the diverse, productive, reliable, and highly trained workforce that safe nuclear construction and operation demands.

As further discussed below, this investment must begin well ahead of construction. The State's workforce planning, procurement, and financing decisions must therefore proceed in advance and on a coordinated timeline, so that job volumes and construction and operations schedules are communicated to the trades and other unions early enough for the workforce to be recruited and trained on the right timeframe.

III. Project Labor Agreements and Labor Peace Agreements Improve Cost, Schedule, Quality, and Safety Outcomes in Alignment with the State's Interests

Project labor agreements (PLAs) are well-suited to precisely the kind of large, multi-trade, complex infrastructure projects that advanced nuclear power represents. A substantial body of research on the use of PLAs in construction associates them with cost savings, greater productivity, improved project quality, and higher worker safety – the very outcomes that allow complex projects like nuclear to be built at the scale and speed New York needs.¹⁰ By establishing wages, work rules, dispute-resolution mechanism, and no-strike commitments in advance, PLAs reduce the risk of labor disruptions, jurisdictional disputes, and other workplace issues that can cause schedule delays, which are especially costly on a multi-year, multi-billion dollar nuclear build. Labor peace agreements (LPAs) serve a similar function on the operations side, protecting the continuity of a facility that will supply firm, baseload power to the grid for decades. Both instruments advance the reliability and affordability objectives of the Backbone to meet rising demand with zero-emission power.

⁸ *Hinkley Point C construction creates 3,000 new jobs*. BBC News (Feb 10, 2025). [Hinkley Point C construction creates 3,000 new Somerset jobs](https://www.bbc.com/news/health-67444444)

⁹ *How Britain Got Investors to Line Up for Nuclear Power*. The New York Times (Nov 1, 2025). <https://www.nytimes.com/2025/11/01/business/britain-nuclear-power-plant-sizewell.html>

¹⁰ MICHAEL MCFADDEN ET AL. QUANTIFYING THE VALUE OF UNION LABOR IN CONSTRUCTION PROJECTS (2022), <https://www.mcaa.org/wp-content/uploads/2023/01/IPA-Study-Quantifying-the-Value-of-Union-Labor-in-Construction-Projects-FINAL.pdf>; see also FRANK MANZO IV ET AL., THE IMPACT OF UNIONS ON CONSTRUCTION WORKSITE HEALTH AND SAFETY: EVIDENCE FROM OSHA INSPECTIONS, ILL. ECON. POL'Y INST. (2021), <https://illinoisupdate.com/wp-content/uploads/2021/11/ilepi-pmcr-unions-and-construction-health-and-safety-final.pdf>.

For projects where the State will bear a share of the financing — such as through the state equity, construction grants, debt finance, Advanced Nuclear Zero Emission Credits (ANZECs) — the schedule certainty, productivity, efficiency, and high-quality project completion benefits of PLAs are directly aligned with the State’s own financial interest in on-time, on budget delivery. Where the State takes on financial exposure to the success of specific projects, a condition of that support should be the project’s entry into a PLA and LPAs. When the State acts as an owner, investor, or financier with financial exposure, the State is a “market participant” and can act to protect its proprietary interest in the specific projects through conditions that ensure efficient, successful project completion. New York has a significant interest in protecting its investments given that the future reliability of the grid to provide safe, reliable, and cost-effective electric service for New Yorkers depends on adding gigawatts of baseload power.

IV. The State’s Active Role Creates Opportunity to Engage Workforce Issues at the Outset

The Options Paper reasons that a conventional, lowest-price Request for Proposals (RFP) process is likely ill-suited to the nuclear context. It reasons that government intervention will involve a number of interacting variables that make price competition difficult to implement (e.g., competitive processes allow only limited room for negotiating and that a lowest-price-bid dynamic could create perverse incentives to bid unrealistically low). The Paper therefore identifies a potential role for competitive negotiation, observing that in this approach, the government participates “not just as a typical government partner but also taking on aspects of a private sector project partner role.”¹¹

CJNY agrees, and emphasizes an important implication: if the State is to engage these projects as an active partner through a negotiated process, rather than a procurement, then workforce development and labor standards can and should be part of the conversation from the outset. These considerations should be built into project structure and negotiated terms rather than considered as an afterthought. The State, acting through the appropriate combination of entities — NYSERDA, NYPA, the Department of Labor, and others — is well positioned to convene developers, engineering, procurement, and construction (EPC) providers, suppliers, building trades, and other unions as early as possible, so that labor standards and workforce strategies are aligned with siting, financing, procurement, implementation, and supply chain decisions. This is particularly important given the lead time required to train and recruit the workforce through registered apprenticeship and pre-apprenticeship programs on the correct timeframe.

V. Committed Pipeline of Mature, Proven Designs Can Maximize Both Cost Reduction and Workforce Development

The Coalition supports the Options Paper’s recognition that selecting a proven, mature reactor design and committing to a pipeline of like units offers significant workforce and cost advantages. A committed pipeline of a single, mature technology provides certainty and clarity

¹¹ ADVANCED NUCLEAR POLICY OPTIONS PAPER, *supra* note 1, at 66.

on the skills, occupations, and trades that a long-term buildout will require, which is precisely what enables effective, well-timed workforce investment. As the Options Paper observes:

Option 1 also offers several additional workforce benefits. The risk of workforce attrition between projects would be reduced by avoiding delays associated with new procurement processes. Training and certification investments can be deployed more effectively, supported by earlier and more accurate visibility into job volumes and construction timelines. This improved visibility enables the State to better coordinate and plan workforce development efforts, which is important given that labor unions typically require at least five years' notice to scale capacity.¹²

The Options Paper's market assessment reports that the Barakah Nuclear Power Plant (Units 1-4) – the first APR1400 units built outside of South Korea – achieved labor cost reductions on the order of 40% between the first and fourth unit because of effective management and a consistent, repeatable design.¹³

A sustained pipeline is likely to achieve lower costs and a durable, well-defined career pathway for New York workers. The Coalition urges the Commission to ensure that any decisions on design and the selection and sequencing of technology are accompanied by strong workforce development programs suited to the complexities of this work and to the goal of high-quality, on-time production.

VI. Strong State Coordination Role and Shared Risk are Necessary and Should be Paired with In-State Supply Chain Development

CJNY agrees with the Options Paper's assessment that these projects cannot realistically proceed without a strong State role alongside the private sector and a sharing of financial risk across multiple parties. Whether through a cost-overflow backstop, revenue bond financing, an equity stake by NYPA, NYSERDA, pre-Financial Investment Decision grants, or some combination, the full package is important for initial advanced nuclear projects that are too large and expensive for any single party to undertake the financial risk and exposure alone.

Finally, CJNY urges the State to treat the growth of a broader in-state nuclear supply chain as part of that full package. Developing the in-state original equipment manufacturing (OEM) facilities and preparing and training the workforce these facilities will require will ensure both good union careers right here in New York, but also can contribute to broader economic development for local communities.

Conclusion

¹² *Id.* at 53.

¹³ ADVANCED NUCLEAR POLICY OPTIONS PAPER APPENDIX B, NYSERDA & DEP'T OF PUB. SERV., B-1 (2026).

CJNY respectfully urges the State to recognize that a highly skilled, well-trained, and adequately scaled union workforce is foundational to the on-time, on-budget, safe, and high-quality delivery of the Nuclear Reliability Backbone. More specifically, the Coalition urges the Commission and State to:

1. Condition any project-specific State support that establishes a genuine proprietary interest on the project's entry into a project labor agreement and labor peace agreement, limited to those projects in which the State holds actual financial exposure.
2. Use its convenor power to engage unions, developers, EPC contractors, suppliers, and other key partners on workforce strategy and labor standards at the outset of the negotiated procurement process, rather than as a back-end condition. This includes sustained investment in the registered apprenticeship and pre-apprenticeship programs to grow the diverse, productive, reliable, and highly trained workforce that safe nuclear construction and operation demands.
3. Ensure that decisions on design and the selection and sequencing of technology are accompanied by strong workforce development programs suited to the complexities of this work and to the goal of high-quality, on-time production.
4. Adopt a strong, integrated State support package with risk shared across parties, as the Options Paper contemplates, with a strong role for in-state nuclear supply chain development to ensure broad-based economic development and good union manufacturing jobs.

CJNY appreciates the opportunity to comment and looks forward to participating in the subsequent stages of this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Esther Rosario', with a stylized, flowing script.

Esther Rosario

Executive Director
Climate Jobs New York
erosario@climatejobsny.org