

 **Independent
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of New York, Inc. (IPPNY)

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Gavin J. Donohue, *President &
Chief Executive Officer*

RAS E-622

DOCKETED
USNRC

August 21, 2012 (4:08 p.m.)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

August 21, 2012

Annette Vietti-Cook
Secretary of the Commission
Office of the Secretary
Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Fax to: (301) 415-1101

Email to: hearing.docket@nrc.gov

Re: Economic Impact of Indian Point Units 2 and 3 License Renewal Application
NRC Docket Nos. 50-247-LR and 50-286-LR
ASLBP No. 07-858-03-LR-BD01

Dear Secretary Vietti-Cook:

On behalf of the Independent Power Producers of New York, Inc. (IPPNY), a trade association representing companies involved in the development of electric generating facilities, the generation, sale and marketing of electric power and the transmission of natural gas in the State of New York, I am writing to express support for the license renewal of Indian Point Units 2 and 3 in Buchanan, New York as a critical component of the state's energy supply system.

It is my understanding that the Nuclear Regulatory Commission is considering numerous issues in connection with the license renewal application, including: (1) the effect of relicensing on land values in the area near the plants; (2) the potential for alternative energy sources; and (3) environmental justice concerns.

IPPNY believes that Entergy's Indian Point nuclear facility is a positive asset for the State of New York and for its millions of residents. The facility's continued operation serves a key role in preserving local land values due to the significant contributions it makes to the regional economy by ensuring electric reliability, minimizing the cost of power, and reducing greenhouse gas emissions in New York State.

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Effect of Relicensing on Local Land Values

Indian Point has approximately 1,100 full-time local employees and, on average, an additional 200 contractors on site. These high-paying, highly skilled jobs support employees, who live in the area and thus pay personal and property taxes to support the local economy, schools and government. The continued operation of Indian Point supports the local economy and the land values of the region based upon: (1) an annual full-time employee payroll of \$137 million; (2) \$75 million in annual property taxes and revenue sharing with the State of New York; (3) approximately \$1.5 million in annual charitable contributions to local and regional charities; and (4) over \$1 billion in annual economic activity for Westchester, Rockland, Putnam, Orange and Dutchess Counties.

Potential for Alternative Energy Sources

Replacing Indian Point's resources would be challenging due to its essential role both in ensuring electric reliability and in minimizing the cost of power in New York State. Indian Point's 2,083 megawatts of generation provides between 25 percent and 30 percent of the electricity for New York City and the lower Westchester County area and 11 percent of the power used statewide. Through Entergy's considerable efforts, Indian Point is a "base-load" power plant that is capable of supplying electricity 24 hours a day, 7 days a week, 365 days of the year. Communities in New York City and in the lower Hudson Valley rely on the power supplied by Indian Point to maintain their businesses, keep the lights on in their homes, and make sure their electricity costs do not skyrocket.

According to the U.S. Energy Information Agency, New York pays the second highest electricity prices in the nation. Numerous studies show that, without Indian Point, electricity prices would rise significantly in New York. Further, the New York Independent System Operator has stated that Indian Point's closure would drastically reduce grid reliability resulting in blackouts, economic disruption, and serious safety issues.

Environmental Justice Concerns

The continued operation of Indian Point allows localities, including areas in New York City, to have air quality with lower emissions. As an important source of baseload energy, Indian Point is a crucial part of the state's electrical grid. Coupling the benefits of baseload power with virtually no emissions of greenhouse gases, the role that Indian Point plays becomes even more significant as New York and our country address climate change.

Various alternative energy sources have been proposed over the years but would not substitute for Indian Point. Last year, the City of New York's Department of Environmental Protection released the results of an independent study performed by Charles River Associates, which demonstrated that alternatives to Indian Point would be higher-priced, impair air quality, and reduce the reliability of the electrical grid.

Thank you for your time and for taking into account my comments on this issue. I encourage you to renew the operating licenses for Indian Point, after considering these and numerous other benefits resulting from Indian Point's continued operation.

Sincerely,

A handwritten signature in black ink, appearing to read "Gavin J. Donohue", is written over the typed name and title.

Gavin J. Donohue
President & CEO

Independent Power Producers of New York
194 Washington Avenue, Suite 315
Albany, New York 12210

cc: Administrative Judge Lawrence G. McDade
c/o Anne Siarnacki, Law Clerk
Atomic Safety and Licensing Board Panel
Mail Stop T-3F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Fax to: (301) 415-5599 (verification (301) 415-7550)
Email to: anne.siarnacki@nrc.gov

Docket, Hearing

From: Radmila Miletich [radmila@ippny.org]
Sent: Tuesday, August 21, 2012 4:08 PM
To: Docket, Hearing; Siarnacki, Anne
Cc: 'Gavin J. Donohue'; radmila@ippny.org
Subject: NRC Docket Nos. 50-247-LR and 50-286-LR - IPPNY comments Indian Point License Renewal and Benefits
Attachments: IPPNY Indian Point letter economics 8-21-12.pdf

Please find attached IPPNY's comment letter to express support for the license renewal of the Indian Point units and economic and other benefits of those units.

Thank you for the opportunity to provide these comments.

Regards,

Radmila P. Miletich
Legislative & Environmental Policy Director
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