

From: [PSC Public Comment](#)
To: [REDACTED]
Cc: [PSC Public Comment](#)
Subject: RE: NEI Comments: Case No. 2025-00186
Date: Monday, July 14, 2025 10:44:00 AM

Case No. 2025-00186

Thank you for your comments on the application of Electronic Investigation of Nuclear Energy, Generation, Storage, and Related Matters. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2025-00186 in any further correspondence. The documents in this case are available at [View Case Filings for: 2025-00186 \(ky.gov\)](#).

Thank you for your interest in this matter.



Please refer to attached to be logged as public comment.

From: HARTMAN, Kristy [REDACTED]
Sent: Friday, July 11, 2025 5:59 PM
To: PSC Executive Director <PSCED@ky.gov>
Subject: NEI Comments: Case No. 2025-00186

Hello,

Please accept these comments on behalf of the Nuclear Energy Institute regarding the PSC request for topic suggestions in preparation for an upcoming informal conference on nuclear energy. I am sure this is an error on my part, but the website is not allowing me to electronically submit a document.

Thank you for including NEI's comments.

Kristy



Kristy Hartman | Director, Stakeholder Strategy & Engagement

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Nuclear Energy Institute
Topics for Consideration
Case Number 2025-00186

Kentucky Public Service Commission
July 11, 2025

The Nuclear Energy Institute (NEI) appreciates the Kentucky Public Service Commission's interest in nuclear energy in the Commonwealth. NEI also welcomes the opportunity to provide suggestions for consideration in response to the PSC's request for topics to cover during an upcoming informal conference.

NEI is the trade association for the commercial nuclear technologies industry, and our mission is to promote the use and growth of nuclear energy through efficient operations and effective policy. NEI has more than 300 members, including companies that own or operate nuclear power plants, reactor designers and advanced technology companies, architectural and engineering firms, fuel suppliers and service companies, consulting services and manufacturing companies, companies involved in nuclear medicine and nuclear industrial applications, radionuclide and radiopharmaceutical companies, universities and research laboratories, labor unions, and international electric utilities.

Nuclear energy is the single largest carbon-free electric generating source in both the United States and around the world. In the U.S., our 94 nuclear reactors produce about half of all carbon-free energy. The energy sector in the U.S. has undergone significant transformation over the last decade and that transformation will continue. NEI recently conducted a survey of its member utilities and found that these utilities anticipate adding more than 100 gigawatts of new nuclear power by the 2050s to guarantee reliable access to clean energy. Non-electric sectors such as industrial heat and transportation are also considering nuclear energy to transition to a reliable, clean, and affordable energy supply.

New advanced reactor designs are being developed by entrepreneurial U.S. companies seeking to expand the value of nuclear technology to our energy system. These designs will be commercially operational this decade and will be ready for large-scale deployment by the early 2030s to meet domestic and global clean energy needs. Enacting state policies and regulations that encourage the use of these new nuclear technologies is particularly timely, as the U.S. Energy Information Administration forecasts the retirement of 140 gigawatts of capacity by 2040 across the U.S.A. key focus of the energy sector will be to replace this retired generation with sources that are clean, reliable, and affordable.

State officials—from Governors, to legislators, regulators, and state agency staff—are playing a critical role in shaping state policies and regulations that can accelerate the development and commercial deployment of next generation nuclear energy and the related supply chain. With

over 60 new nuclear projects being considered for construction across the country, Kentucky is smartly considering the world's largest form of clean energy at the right time.

As the Kentucky PSC examines the potential for nuclear in the Commonwealth, NEI suggests the following topics for inclusion in future conversations:

Signaling Regulatory Support

- The Kentucky Public Service Commission may want to explore providing regulatory preapproval for projects and support cost recovery of early site permits, initial licensing and project development costs, and other early-stage activities as this could reduce risks associated with next generation nuclear projects. These signals do not commit the commission or the ratepayer to unnecessary costs but allow the industry to take essential first steps towards exploring next generation nuclear deployment. These initial steps of support by the public service commissions across the U.S. allow utilities to adequately plan for long-lead-time generation assets and without these initial approvals, utilities may be unable to meet operation timelines for proposed next generation nuclear deployment.
- The Commission should also consider allowing annual adjustments for recovery of Construction Work In-Progress (CWIP) through regulation or through legislation introduced by Kentucky General Assembly.

Community, Public, & Stakeholder Engagement

- Strong and continuous engagement with communities and the public is essential as the U.S. looks to deploy next generation nuclear technologies. The Commission should examine industry efforts to build strong relationships in communities, as well as the many independent opinion polls which show public support for nuclear energy is high.

Supply Chain & Workforce

- There are many efforts underway to build out and ensure a strong nuclear supply chain and workforce as new nuclear projects move forward around the country. The Commission may want to explore some of the efforts currently underway in the Commonwealth and the ways in which the PSC can enhance and support those activities. This may include support for companies like Global Laser Enrichment, who are pursuing efforts in Paducah with their laser-based uranium enrichment technology which would re-establish the Commonwealth as a leader in the nuclear fuel supply chain. This could also include collaboration with the Kentucky Nuclear Energy Development Authority on workforce development initiatives.

Exploring Regulatory and Permitting Frameworks

- The Kentucky PSC may want to examine the regulatory and permitting frameworks and opportunities to streamline and prepare for advanced nuclear deployment. While the Nuclear Regulatory Commission (NRC) has sole authority over safety regulation, Kentucky may wish to provide perspectives on the need for regulatory modernization and the desired attributes of a more modern framework. Opportunities to provide input include the Part 53

rulemaking and following the industry-proposed “Regulations of Rapid High-Volume Deployable Reactors in Remote Applications (RHDRA)” that would improve the ability of nuclear energy to protect the public health and safety, as well as the business and economic interests of the state. The Commonwealth may also want a role in the emergency preparedness and environmental considerations of advanced nuclear, and working with the NRC and industry will help to ensure that these state-level permitting and regulation frameworks align with the NRC’s and are effective and efficient for advanced reactors

Understanding Federal Policies

- There are several key recent federal actions that provide critical support for advanced nuclear technologies. The commission may want to explore how the commonwealth can support these federal efforts, ensure the key policies are retained, and support additional federal efforts that reduce risks to customers, especially related to new construction.

We appreciate and applaud the Kentucky PSC for exploring the potential of nuclear energy in the Commonwealth.

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