

January 13, 2023

Alaska Department of Environmental Conservation
Siting of Microreactors – Public Scoping for Regulation Development
PO Box 111800
Juneau, AK 99811

To Whom it May Concern,

Copper Valley Electric Association (CVEA) appreciates the opportunity to provide comments for this public scoping for regulation development related to the siting of microreactors in Alaska. Alaska's electric utilities are actively taking part in the ongoing energy transition and microreactors can play a key role in that transition.

CVEA is an electrically isolated electric cooperative located in interior Alaska, headquartered in Glennallen, and serving the City of Valdez, 160 miles north along the Richardson Highway and 100 miles east and west along the Glenn and Tok Cutoff Highways. CVEA serves nearly 4,000 meters utilizing a mix of hydroelectric and liquid fossil fuels from five power generation plants.

As the Alaska Department of Environmental Conservation (DEC or the department) considers the elements to include in regulations related to siting of microreactors, the department should adhere to the law as established by Senate Bill 177, which was passed in 2022 during the 32nd Alaska legislature. This legislation was carefully considered through the legislative process with expert testimony and input from legislators and state agencies.

Importantly, the law as passed in SB 177 exempts the requirement for microreactors to only be situated on legislatively designated lands. This exemption provides local control to cities, municipalities, and boroughs and avoids a potentially long political process under legislative siting authority. In situations where a proposed microreactor is in an unorganized borough, the legislature retains siting authority.

DEC's draft regulations should respect this local authority and remove DEC from any involvement in siting decisions unless specifically asked by a local governing authority. The department, per SB 177, will still be involved in the eventual permitting of a microreactor due to provisions in AS 18.45.030(c) that require DEC to coordinate and submit comments from the departments or agencies referenced in AS 18.45 to the Nuclear Regulatory Commission licensing process specific to the microreactor.

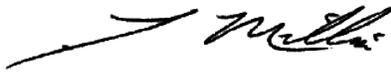
The intent of SB 177 was to streamline a portion of the process necessary to construct and operate a microreactor in Alaska. This technology is part of a growing toolkit of alternative

energy infrastructure that can diversify electric generation and potentially lower costs and increase reliability in many parts of the state.

The department's draft regulation on siting of microreactors should recognize that an in-depth state and federal permitting process still exists before a microreactor can be constructed and operated. DEC should craft microreactor siting regulations that take a minimal approach to the siting process except in those situations where the agency is specifically asked to weigh in.

Thank you again for considering CVEA's comments. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Million". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Travis Million
Chief Executive Officer

CC: Governor Mike Dunleavy
John Espindola