



November 21, 2025

Director Tina Francone
Grid Deployment Office
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Subject: Advanced Nuclear First Mover Initiative Response to the U.S. Department of Energy’s Speed to Power Request for Information

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Institution Focus: Representing 56 Governor-Designated State Energy Offices

Dear Director Francone,

The National Association of State Energy Officials (NASEO) appreciates the opportunity to provide input on the U.S. Department of Energy’s (DOE) Request for Information (RFI) on the Accelerating Speed to Power Initiative on behalf of NASEO’s members, and in particular the 11 states comprising the NASEO Advanced Nuclear First Mover Initiative.

To support the work of key states interested in nuclear power, NASEO facilitates the Advanced Nuclear First Mover Initiative in partnership with Idaho National Laboratory (INL) and DOE’s Gateway for Accelerated Innovation in Nuclear. The Initiative is led by the state co-chairs New York, Indiana, Kentucky, Tennessee and Wyoming, and the participating states Louisiana, Maryland, Pennsylvania, Utah, Virginia, and West Virginia. These states are committed to accelerating advanced nuclear projects by working with private sector partners and DOE and ensuring the continued safety and reliability of nuclear power. Twelve states have also joined the initiative as Observers: Connecticut, Idaho, Massachusetts, Michigan, Minnesota, Missouri, Montana, New Jersey, North Dakota, Texas, Washington, and Wisconsin.

NASEO supports participating First Mover states by:

- Identifying pathways to accelerate advanced nuclear projects;
- Reducing financial and technology risks;
- Devising supportive market adoption policies;
- Defining supply chain needs;
- Developing coordinated procurement options;
- Identifying opportunities for early site permits; and
- Creating public-private partnerships.

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In response to this RFI and in consideration of the Advanced Nuclear First Mover Initiative, NASEO offers the following comments and recommendations:

I. Implement a Federal-State Competitive Request for Advanced Nuclear Proposals

The eleven First Mover states have demonstrated a commitment to work together and collaborate on new nuclear deployment. To support the momentum on the state-level, NASEO recommends DOE explore a competitive request for proposals aimed at accelerating deployment in conjunction with State Energy Offices. For example, a DOE competitive funding opportunity, informed by state input, could support a multi-state or topical advanced nuclear accelerator program that builds on existing relationships among the First Mover states and the private sector and fosters stronger multi-state collaboration to leverage resources and lower costs. Such an accelerator program could integrate relevant components of the orderbook strategy under development by the First Mover states and also involve coordinated state policy incentives in addition to federal support.

II. Federal Support for the Pre-Qualification of Sites for Advanced Nuclear

Support for states on pre-qualification of sites and Early Site Permitting activities is critical to advance new nuclear. The Advanced Nuclear First Mover Initiative has very limited funding to support preliminary state site screening work in partnership with INL and Oak Ridge National Laboratory (ORNL). However, additional federal support is needed to help all First Mover states take the next step in site preparation, review, and selection. This effort could be enhanced by the NASEO recommended DOE-state assessment of technology readiness and supply chain feasibility to ensure that state-supported sites are matched with deployable reactor designs aligned with the emerging state and federal orderbook strategies.

DOE should also consider working with NASEO and the First Mover states to develop a competitive funding opportunity aimed at kick-starting essential Early Site Permitting for advanced nuclear projects. The Early Site Permitting competitive funding approach could include multi-state coordination and agreement on a particular advanced nuclear design(s), based on technology and market criteria, aimed at lowering development costs and project risks consistent with an orderbook strategy. This Early Site Permitting approach would open the market for new nuclear, speed development, and ensure greater private sector investment and decision making.

III. Utilize the First Mover States as Pilot States for Streamlining Permitting Processes

The First Mover states could serve as pilots for streamlining the permitting process for new reactors (both large light water reactors and SMRs) utilizing AI and other tools in partnership with DOE and the Nuclear Regulatory Commission. Coordination with DOE on public education and local stakeholder engagement approaches would complement this work, helping states address important concerns early and transparently. The lessons learned and work done by the First Mover states could be replicated across the country.

IV. Engage International Partners on Relevant Issues

DOE should facilitate engagement and partnerships between U.S. states and allied-nation governments relevant energy agencies in such nations as the United Kingdom, Japan, France, and South Korea, as well as nuclear supply-chain companies in those nations. Information

sharing on issues such as nuclear waste reprocessing, supply chain, orderbooks, and workforce would speed deployment and put downward pressure on costs.

V. Collaborate with States in Assessing Ready-Now Nuclear Technologies

We recommend that DOE build on the excellent technical assistance being provided to the First Mover states by INL, ORNL, and GAIN, in partnership with NASEO, to assess and characterize advanced nuclear technologies readiness for deployment. This could be accomplished through a DOE-First Mover set of criteria that includes, for example, technology readiness levels, consideration of domestic and allied-nation supply chain capacity, affordability, and performance data from existing prototypes and demonstrations. The resulting information and analyses would support coordinated state and federal deployment, as well as federal and state decisions on the prioritization of incentives and siting.

IV. Partner with States to Support Local Stakeholder Education for Advanced Nuclear

NASEO recommends that DOE support states in developing comprehensive stakeholder education strategies for advanced nuclear. Robust stakeholder education will accelerate project timelines and build sustained public trust. These DOE-state efforts could include:

- Providing data, training, and communications support for state and local officials;
- Supporting best practices approaches and transparent data and analyses that address public concerns (e.g., safety, fuel, costs).
- Offering support for state-led pilots demonstrating successful public-private education models; and
- Coordinating state and federal information and priorities on workforce and economic development.

Thank you for the opportunity to provide comments. The Advanced Nuclear First Mover Initiative looks forward to working with DOE on this important issue.

Best regards,



David Terry, NASEO President