



***In the Matter of Docket # CN-24-68 (Additional Dry Cask Storage at PINGP)***

Chair Sieben and Members of the Public Utilities Commission,

The Minnesota Land & Liberty Coalition® (L&LC) is a statewide organization made up of farmers, landowners, taxpayers, ratepayers, business and community leaders, and proponents of an all-of-the-above energy future here in Minnesota. The coalition is united by support for protecting private property rights, investing across Minnesota, building a resilient and reliable energy grid, and ensuring the United States' national security.

Minnesota L&LC is writing in support of issuing a Certificate of Need for additional dry cask storage at the Prairie Island Nuclear Generating Plant, located on the land of the Prairie Island Indian Community. The need for this action could not be clearer: as Minnesota races toward its 100% carbon-free energy mandate by 2040, our state requires reliable baseload carbon-free sources to ensure grid stability and prevent service interruptions. The sun is not always shining, and the wind is not always blowing. Even with the broad and aggressive deployment of battery storage systems, an electric grid without nuclear baseload power is unreliable.

Minnesota's two nuclear generating plants account for over 20% of Minnesota's domestic energy production.<sup>1</sup> Failing to extend the lifespan of the plant at Prairie Island would reduce our state's nuclear energy production by half, leaving Minnesota vulnerable to service interruptions.

Minnesota L&LC is also mindful of the concerns of the Prairie Island Indian Community as well. It is noted extensively, however, in the Final Environmental Impact Statement that any radiological impacts with a lifespan extension are "minimal and indistinguishable from [normal, everyday] background radiation" provided that monitoring and maintenance continue as required.<sup>2</sup>

Nuclear energy in 2025 is safe, reliable, and remains the most efficient form of carbon-free energy. If Minnesota hopes to hit its 100% carbon-free goal by 2040, nuclear energy must continue to be a significant generator in the fuel mix.

Thank you for your consideration.

Respectfully,

Nathan Dull  
Senior Field Manager  
Minnesota Land & Liberty Coalition®

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<sup>1</sup> U.S. Energy Information Administration. "Minnesota State Energy Profile and Energy Estimates," September 19, 2024. <https://www.eia.gov/state/analysis.php?sid=MN#29>. "Electricity"

<sup>2</sup> Ness & Minnesota Department of Commerce, "Final Environmental Impact Statement: Prairie Island Nuclear Generating Plant Additional Dry Cask Storage." S-1 & S-2.