



June 23, 2025

Minnesota Public Utilities Commission
121 7th Place East, Suite #350
Saint Paul, Minnesota 55101

RE: *Public Comment in the Matter of the Application of Xcel Energy for a Certificate of Need for Additional Dry Cask Storage at the Prairie Island Nuclear Generating Plant Independent Spent Fuel Storage Installation*
MPUC Docket No. E-002/CN-24-68

MPUC Chair Katie Sieben and Commissioners:

The City of Red Wing ("City") submits these comments regarding Northern States Power d/b/a Xcel Energy's application for a Certificate of Need for additional dry cask storage at the Prairie Island Nuclear Generating Plant (PINGP). Red Wing supports the continued operation of the PINGP and acknowledges its important role in helping the State of Minnesota achieve its "100% by 2040" clean energy goals. We offer our support for the Certificate of Need application with several proposed considerations to address long-term community impacts.

Red Wing has proudly hosted the PINGP for over 50 years. It remains one of our largest local employers and the top contributor to our property tax base. We appreciate Xcel Energy's economic presence and partnership. However, with that presence come unique responsibilities and challenges. These include the need for long-term public safety readiness and limitations on land use due to the presence of spent nuclear fuel.

Our comments focus on ensuring that the future of this facility, especially as it relates to long-term dry cask storage, is approached with transparency and community input.

Analysis of Long-Term Dry Cask Storage

We request that Xcel Energy provide an updated long-term analysis of spent fuel storage, including clarification on the need for dry cask replacement and the anticipated lifespan of

casks. While spent fuel storage has historically been viewed as “temporary,” court decisions and the ongoing lack of a federal disposal solution suggest this material may remain in Red Wing for decades—possibly a century or longer. Given this reality, we encourage a clear plan to evaluate and prepare for eventual dry cask recasking or replacement. This planning will assist the City of Red Wing and other stakeholders in understanding the long-term stewardship responsibilities that may lie ahead.

Transition Planning and Emergency Preparedness

The City requests that a transition plan be developed collaboratively to address the period after the PINGP ceases energy production. This includes a comprehensive radiological emergency response plan tailored to the independent spent fuel storage installation (ISFSI). As the primary responder to any incident, the City of Red Wing must maintain continuous emergency readiness and infrastructure—resources that will remain essential long after energy production ends. A detailed transition plan will provide much-needed certainty as Red Wing plans for its future.

Support for Reactivating the Renewable Development Account Advisory Board

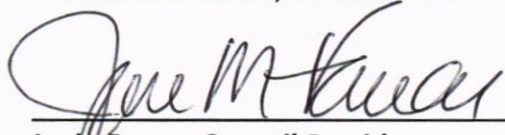
The City supports the reactivation of the Renewable Development Account (RDA) Advisory Board. These funds are collected from storage at Prairie Island and Monticello, and we believe communities that host such facilities should have a voice in how these funds are allocated. If the Advisory Board is reestablished, the City of Red Wing respectfully requests representation to reflect our unique role in hosting and supporting this critical energy infrastructure.

Conclusion

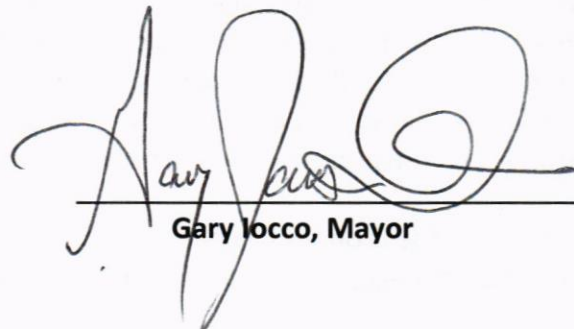
The City of Red Wing supports the Certificate of Need application, contingent on long-term planning commitments and transparent collaboration. We appreciate your consideration of these comments and your service to the State of Minnesota.

Respectfully submitted,

CITY OF RED WING, MINNESOTA



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