

PRAIRIE ISLAND INDIAN COMMUNITY LEGAL DEPARTMENT

April 7, 2025

Jenna Ness, Environmental Review Manager Minnesota Department of Commerce 85 7th Place East, Suite 280 St. Paul, MN 55101-2198

RE: Final Environmental Impact Statement for Xcel Energy's Certificate of Need Application before the Minnesota Public Utility Commission (Docket No. E002/CN-2-68)

Dear Ms. Ness:

The Prairie Island Indian Community ("PIIC") offers the following clarifications to the Minnesota Department of Commerce's Final Environmental Impact Statement ("FEIS") for Xcel Energy's Certificate of Need application to the Minnesota Public Utilities Commission ("Commission") for additional on-site storage at its Prairie Island Nuclear Generating Plant ("PINGP") of spent nuclear fuel ("Project"). Because the final EIS will be used by the Commission to determine whether to grant a Certificate of Need to authorize Xcel Energy to store additional spent nuclear fuel on-site at the PINGP and be used as a reference document for many years, we feel it is important to correct the following:

- Page 6 (top of page). The FEIS states that Xcel will submit the Subsequent License Renewal ("SLR") application after 2024. It is our understanding that the SLR application will be submitted to the US Nuclear Regulatory Commission ("NRC") in late 2026.
- Page 6 (second paragraph). The FEIS states that there are 52 dry fuel storage ("DFS") (as of August 2024) stored at the ISFSI. PIIC has been informed by Xcel that there will be 55 DTS (loading three more in the next few months) by the end of 2025.

Thank you for correcting the record. If you have any questions, please feel free to contact me at jessie.seim@piic.org or Heather Westra at heather.westra@piic.org.

Mvto (Thank you),

Jessie Stomski Seim General Counsel