

1 PUBLIC HEARING

2 MARCH 25, 2025 - 6:00 P.M.

3 BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS
4 FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION

5
6 In the Matter of the Application of Xcel
7 Energy for a Certificate of Need for Additional Dry
8 Cask Storage at the Prairie Island Nuclear
9 Generating Plant Independent Spent Fuel Storage
10 Installation

11
12 OAH DOCKET NO. 25-2500-39971

13 MPUC DOCKET NO. E-002/CN-24-68
14
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17 Red Wing Ignite Building
18 419 Bush Street
19 Red Wing, MN 55066
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24 BEFORE: Judge Megan McKenzie

25 STENOGRAPHIC COURT REPORTER: Jonna Schrupp

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21 WHEREUPON, the following proceedings
22 were duly had and entered of record, to wit:

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1 JUDGE MEGAN McKENZIE: Good evening,
2 everyone. We are now going to convene this public
3 hearing in the matter of the Application of Xcel
4 Energy for a Certificate of Need for Additional Dry
5 Cask Storage at the Prairie Island Nuclear
6 Generating Plant Independent Spent Fuel Storage
7 Installation.

8 This is PUC Docket number CN-24-68 and
9 this is Office of Administrative Hearings docket
10 number 25-2500-39971.

11 My name is Judge McKenzie. I am an
12 Administrative Law Judge with the Office of
13 Administrative Hearings.

14 The Office of Administrative Hearings is
15 an independent entity of state government. It is
16 not affiliated with the Public Utilities Commission,
17 Department of Commerce, the Attorney General's
18 Office or any other entity of state government. It
19 is also independent from Xcel Energy and all of the
20 parties to this proceeding.

21 The Public Utilities Commission has
22 referred this case to me to conduct these public
23 hearings on Xcel Energy's Application, and my job
24 here is to provide a fair and independent assessment
25 of the application and the facts in the record.

1 As I said, this is a public hearing to
2 gather comments on the application filed by Xcel
3 Energy on a Certificate of Need application to store
4 additional spent fuel at the existing storage
5 installation at the Prairie Island nuclear
6 generating plant.

7 The primary purpose of this hearing is to
8 gather input from members of the public about
9 whether or not this project should be approved.

10 What we will do is, after I give a short
11 introduction we are going to have some brief
12 presentations from a few of the panelists, including
13 the PUC, Xcel and the Department of Commerce, who
14 has done the environmental impact statement.

15 After those presentations I will open the
16 floor to public comments. We have a court reporter
17 present here who is taking down everything that
18 occurs at this proceeding. It's important that we
19 get an accurate record. The transcript is something
20 that I will use when I write my report for the
21 Public Utilities Commission.

22 I will write a report that includes
23 Findings of Facts, Conclusions of Law and a
24 recommendation that will go to the Public Utilities
25 Commission, who will make the final decision on this

1 matter this fall.

2 So I ask that everyone -- I do have the
3 register of people who have signed up to speak.
4 When you are called to speak I'll just ask that you
5 try to speak clearly and enunciate, spell any names
6 that may be unfamiliar to myself or the court
7 reporter so that the record is accurate.

8 We are not in a courtroom but this is an
9 official court proceeding, so I do ask that everyone
10 maintain decorum and just speak one at a time.
11 Everyone will get an opportunity to be heard. I
12 just want to make sure that I get to hear from all
13 of you.

14 So I would encourage anyone who wants to
15 make comments, if you have not signed up I will
16 still give an opportunity. What I will do is go
17 through the folks who have signed up and then ask if
18 there's anyone else who wants to make a comment or
19 ask questions. But before we do that I will move to
20 Craig from the PUC to give a brief presentation on
21 their behalf.

22 MR. CRAIG JANEZICH: Hello. My name is
23 Craig Janezich and I work with the Public Utilities
24 Commission, I'm the energy facilities planner.

25 When the Commission makes a decision they

1 look at the Certificate of Need and the requirements
2 of Certificate of Need under 7855120. So you have
3 to look at the probable and direct result and denial
4 of an adverse impact of denying the Certificate of
5 Need or not, whether there's a more prudent
6 alternative available that the Commission should
7 consider, and then evidence in the record showing
8 whether there's a cost benefit, if the cost is more
9 than the benefit, essentially, in that third bullet,
10 and then evidence in the record shows there's no
11 conflict between federal and state rules and laws.

12 This is a general review of the timeline
13 that we're anticipating. As you can see we had the
14 virtual hearing yesterday, today we have the in
15 person meeting. The public hearing comments period
16 closes on April 10th. We expect the Administrative
17 Law Judge to have a report to the Commission on July
18 1st, and tentatively the Commission will make a
19 decision in July or August of 2025, if everything
20 goes as planned.

21 This slide right here is the written
22 comment period, again, it's April 10, 2025, at 4:30
23 p.m., we ask that you get the comments in on that
24 date or before then. There's several ways you can
25 do it, you can do it via our

1 mn.gov/puc/consumers/public-comments. It's also in
2 the paper slides if you want to get a copy of those.
3 U.S. mail and e-mail. We do ask that you include
4 the docket number when you submit it to us, just
5 include 24-68, and then we ask that you focus your
6 questions on the three questions here; is the
7 environmental impact statement adequate, should the
8 commission grant a Certificate of Need and what
9 other additional conditions should be part of that
10 if we do issue that Certificate of Need.

11 I just want to give you a quick overview
12 of eDockets if you're not familiar with eDockets.
13 This is where everything that we get is filed,
14 including the ALJ's report, any comments you submit
15 will go on edockets, and that's the ALJ and the
16 Commission uses what's in that record, exclusively
17 what's on that website to make a decision and apply
18 the Certificate of Need requirements to that.

19 So to get the environmental impact
20 statement, there's the Commerce's website, which is
21 right there, and this will be on edockets, the Power
22 Presentation itself, so all the links will be
23 clickable, because these are kind of long I realize.

24 The full case record is also available
25 through edockets, just put in 24-68. If you see

1 that red box in the left hand side where it says
2 docket number, if you put in 24-68 and hit search
3 you'll see the entire record of every comment that's
4 been filed. You also can subscribe to the docket if
5 you'd like. There's a link to that, you put your
6 e-mail in and so any time someone will file
7 something to the docket it will go in to your inbox
8 and you'll be able to review it instead of having to
9 look at the website. And I'll hand it over.

10 MS. CAROL OVERLAND: Question?

11 MR. CRAIG JANEZICH: One more thing, and
12 I'm not going to answer your question, I know that.

13 One thing to consider about that timeline
14 as well, the Commission will make a decision in
15 July/August 2025 according to the timeline. The
16 legislature then has a session, the 2026 session, to
17 reject it, modify it, whatever they may do. They
18 may not take any action on it but they have the
19 ability to take action on it before it comes
20 official or becomes part of the record.

21 MS. CAROL OVERLAND: Yeah, that second
22 slide, Chapter 216E and Minnesota chapter 7850, but
23 this is not a siting docket, this is a Certificate
24 of Need, so wouldn't it be 216.B243.

25 MR. CRAIG JANEZICH: I'll correct that.

1 JUDGE MEGAN MCKENZIE: We need to get
2 identifications before you speak, please.

3 MS. CAROL OVERLAND: Carol Overland, Red
4 Wing Minnesota.

5 MS. PAM GORMAN: Good evening. My name
6 is Pam Gorman. I work for Xcel Energy. I've worked
7 for the company for 35 years now, most of that has
8 been at the Prairie Island Nuclear Plant. My
9 background is in operations of the plant. I now
10 work at our corporate office on the policy side.

11 So I'm up here tonight to give you a
12 brief overview of the project and background on what
13 we're planning to do.

14 Again, the docket numbers are up there
15 but we saw that earlier in the presentation.

16 This is the filing that we made on
17 February 7th, 2024, for the Certificate of Need
18 application, again, just a picture of the cover.

19 In general, this is a high level
20 overview. We believe operating the plant for
21 another 20 years, to 2053 and 2054, is in the best
22 interest of our customers, our communities that we
23 serve, the environment, the state. And so our
24 application is seeking to extend the operation.

25 We need to increase the spent fuel

1 storage that we have onsite if we're going to
2 operate an additional 20 years, and so what this
3 Certificate of Need really does is extend that
4 storage by the 20 years and gives us enough fuel to
5 keep the plant operating.

6 Again, this 20 year extension is part of
7 -- we have the most recent integrative resource plan
8 that was approved by the Commission in February of
9 2025 and part of that was looking at our nuclear
10 plant operation, and as approved by the Commission
11 we included the Prairie Island extension.

12 Again, we are going to add storage to the
13 existing footprint, which we have some boards here
14 and I'll have a slide that shows the independent
15 spent fuel storage installation. But currently we
16 have 52 containers at the site and we will not be
17 changing the footprint. The left hand picture there
18 shows a drawing of possibly where we will put the
19 additional pads once we need them.

20 Again, Minnesota state statute requires
21 that we do a Certificate of Need to expand spent
22 fuel storage and that is what the application is
23 that we're discussing tonight. It further requires
24 an environmental impact statement, as discussed.
25 That was issued in February of 2025 and the comment

1 period on adequacy goes until April 10th.

2 We've obviously had a previous
3 Certificate of Need that allowed us to have spent
4 fuel storage to get to the current NRC license,
5 which is 2033 and '34, and as mentioned we filed
6 this Certificate of Need on February 7th of 2024,
7 and it supports the storage that allows operation of
8 Prairie Island.

9 Craig already went through the timeline
10 but expecting a decision sometime between now and
11 the end of 2025 and then have that legislative state
12 requirement.

13 As mentioned, we currently have 52 dry
14 spent fuel storage systems at Prairie Island and in
15 the independent spent fuel storage facility. We
16 will be adding a concrete pad for the expansion, but
17 again nothing beyond the footprint itself.

18 For that 2033/'34 to 2053/'54, we are
19 anticipating approximately 34 canisters will be
20 added to the site, and again, of course, that
21 supports the 20 year extension.

22 So we have a state process, which we're
23 in now for the Certificate of Need. We also have to
24 go through a federal process with our regulator,
25 which is the Nuclear Regulatory Commission.

1 So like I said, our license will expire
2 in 2033 and '34 for those two units, and to extend
3 it it's called a subsequent license renewal process,
4 and we anticipate that we will file that SLR,
5 subsequent license renewal, in the fall of 2026.

6 We expect that the review by the NRC,
7 there's also public hearings throughout that
8 process, they come in and evaluate the safety.
9 They're really determining can you safely operate
10 the plant for another 20 years. They're asking us
11 to show our age and management program and
12 evaluating that before they're issuing a license
13 that allows to us continue to operate.

14 So, again, we would expect that license,
15 based on the previous one, to take anywhere from 18
16 to 24 months and completed by fourth quarter of '28.

17 The NRC has already granted nine SLRs to
18 date, including our Monticello nuclear plant, which
19 was approved in December of 2024. There's currently
20 13 under review and then, as mentioned, another 28
21 have submitted a letter of intent that they intend
22 to extend as well.

23 Again, you can see on the drawings over
24 there, you know, pictured up here, as I mentioned,
25 we have 52 casts loaded and we'll add additional

1 pads here to one of the sides, not entirely sure on
2 that. As you see, there's an area with security
3 fences around it. Security is able to monitor that
4 area, and then the whole area is surrounded by an
5 earth and berm. Again, not real easy to see on the
6 slide but you can look at the drawings and the areas
7 surround by an earth and berm, and then you see the
8 plant's two units in the background there.

9 That's kind of it. That's the overview
10 of the project tonight. Again, you're more than
11 welcome to e-mail me with questions or Amanda
12 Jepson, who works for me and is really managing this
13 application, we're happy to take questions.

14 Are we doing questions now? We'll do
15 that at the end.

16 MS. JENNA NESS: My name is Jenna Ness,
17 I'm with the Minnesota Department of Commerce.
18 Thank you for taking time out of your night to come
19 to the public hearing today.

20 I work in energy environmental review and
21 analysis, which means I do environmental review and
22 I wrote the EIS for the project.

23 So we're at the final EIS stage. This is
24 the environmental review document for the project
25 for the Certificate of Need, and analyzes potential

1 human health and environmental impacts as well as
2 alternatives to the project as part of the
3 Certificate of Need proceeding, and this document
4 will be used by the Commission, along with the rest
5 of the record, to make their decisions about the
6 Certificate of Need.

7 So I would urge you to grab a copy of the
8 presentation, so you have all of these links and
9 e-mails we've been talking about. You can find the
10 EIS on Commerce's website if you follow the
11 instructions here, that Craig explained. It's also
12 on the PUC website on edockets. There is a print
13 copy in the public library at Red Wing, so I would
14 encourage you to use that if you want a printed
15 copy, because there is a limited number of print
16 copies on request. They're just very large
17 documents and expensive to print.

18 I'll go ahead and hand it back to the
19 Judge.

20 JUDGE MEGAN MCKENZIE: Thank you. So I
21 am going to open the floor to public comments. I
22 will ask that you begin by stating and spelling your
23 name so that the court reporter gets it right in the
24 transcript and that it's right in my report.

25 We will put the slide back up later about

1 how to make written comments. You are encouraged to
2 make any comments that you wish tonight. You can
3 also make written comments. I just want to note
4 that all comments are given the same weight, whether
5 they are made in person or in writing. So you can
6 make your comments in whichever way feels most
7 comfortable to you and they are all given the same
8 important and due consideration. So I will remind
9 everyone that that deadline is April 10th to make
10 any comments on this project.

11 You can ask questions of the departments
12 or Xcel if you wish, I cannot promise you that they
13 will answer them, but you are welcome to pose any
14 questions that you would or make any comments.

15 What we are focussing on is basically
16 whether this project should be approved, whether the
17 environment impact statement is adequate and any
18 questions or concerns you have I am happy to hear
19 them.

20 So I will turn now to the comments that I
21 have written down. Once we get through the -- I
22 have five individuals who have requested to make
23 comments. Once we get through those I will ask if
24 anyone else has a follow up or has changed their
25 mind and would like to say anything. So the first

1 individual I have is Ms. Carol Overland.

2 MS. CAROL OVERLAND: Do we stay here?

3 JUDGE MEGAN McKENZIE: You can stay
4 seated if you'd like, that's fine. Just project
5 loudly enough so the court reporter can hear you.
6 And I will ask that if you have any trouble hearing
7 of the comments just speak up.

8 MS. CAROL OVERLAND: First I have two
9 quick questions, one for Ms. Gorman. Is this going
10 to remain a part 72 or is it going to change it to a
11 part 50?

12 MS. PAM GORMAN: No, it's going to remain
13 a part 72.

14 MS. CAROL OVERLAND: The next question,
15 where you're talking about weighing the comments.
16 The rules say that under oath makes a difference,
17 will that matter to you if it's under oath or not
18 under oath?

19 JUDGE MEGAN McKENZIE: If you would like
20 me to swear you in I'm happy to swear you in. In
21 general, it's not -- I take the comments, you know,
22 usually folks have questions, they have opinions,
23 and I am here to listen to that. So if anyone would
24 like me to swear you in I'm happy to do that, but I
25 don't necessarily view it as dispositive. So if

1 anyone wants me to do that I can, but in general I'm
2 here to listen to the community's feedback and
3 opinions about the project.

4 MS. CAROL OVERLAND: I would like that.

5 (WHEREUPON, Ms. Overland was sworn in.)

6 MS. CAROL OVERLAND: This is a
7 Certificate of Need hearing, a Certificate of Need
8 docket, and I'm finding that need is -- the whole
9 concept of having a decision on this is questionable
10 because it's really a matter of economics, not of
11 whether the company needs power. And in this
12 situation we have Prairie Island, which is receiving
13 quite a bit of money for having its casks there, Red
14 Wing is now seeking a similar deal. So where does
15 that leave people, and where does that leave the
16 rest of us, as far as what our comments are worth,
17 if the primary participants in this are already
18 agreed to, you know, let it happen, let it be there.
19 So I don't see much opportunity for us to do
20 anything about this.

21 But in the meantime, you know, when we're
22 talking about need, Xcel has had a peak demand of
23 9,859 megawatts back in 2006. That was previous to
24 CapX, and at that time, in the CapX application of
25 2006 for need, they were claiming a 2.49 percent

1 demand, then what's happened is that hasn't
2 happened, it hasn't even come close. And in 2024,
3 based on SEC filings, the demand for 2024, the peak
4 demand, was 8,882. So it's about 400 less. We have
5 not, in 24 minus six years, met that 9,859 peak
6 demand. And what's happening also is we've had a
7 lot of conservation, and more so we've had a massive
8 transmission build out and we had CapX, which was
9 about 700 miles of very (inaudible) transmission, we
10 had the MISO MV project, that was another massive
11 build out, and now we're looking at applications for
12 765 KV lines running across Minnesota.

13 So, you know, need is questionable as far
14 as whether they need the power. And then there was
15 testimony in this docket from Jason Standing of Xcel
16 who was rebutting the testimony by DER Zwig, talking
17 about transmission, and it was questionable whether
18 they needed transmission -- that the generation
19 wasn't needed as much as the transmission was
20 needed, and I interpret this as the transmission
21 isn't where they want it. And we've cited a lot of
22 generation but we've cited generation where there is
23 not transmission and that is a problem of both
24 Xcel's and the Commission for permitting that
25 generation, whether it's transmission -- so when

1 they're talking about transmission here, I think
2 that's something we really need to be paying
3 attention to. I'll be putting more written comments
4 on that, and I think I'll leave it at that and I'll
5 put it in written comments.

6 JUDGE MEGAN MCKENZIE: Thank you very
7 much for your participation and your feedback
8 tonight.

9 I apologize, the next signature on the
10 sign up sheet is in cursive and I can't read it very
11 well. Perhaps Charlotte.

12 MS. CHARLOTTE EASTIN: Eastin.

13 JUDGE MEGAN MCKENZIE: I will ask you to
14 introduce yourself for the court reporter and then
15 make your comments.

16 MS. CHARLOTTE EASTIN: I'd prefer to
17 stand.

18 JUDGE MEGAN MCKENZIE: Go ahead.

19 MS. CHARLOTTE EASTIN: I don't have a
20 very strong voice. My name is Charlotte Eastin,
21 C-h-a-r-l-o-t-t-e E-a-s-t-i-n. I live in Lake City,
22 Minnesota. I'm a retired human service worker. I'm
23 not a lawyer. I'm not a scientist. I'm just a
24 person who has been concerned about this industry
25 for over 50 years and I've been following -- the

1 whole problem of the radioactive waste has been very
2 troubling for me.

3 I've been at these hearings before, this
4 is like deja vu all over again. I don't know how
5 many of these hearings I've gone to. I think the
6 one I went to in 2014, I believe it was, when NSP
7 was asking for more storage -- I'm sorry, Xcel was
8 asking for additional storage back then, and the
9 deal was they were going to get their more storage
10 but we were going to get renewable energy. We were
11 going to get lots and lots of solar and wind energy.
12 But when I went to the hearing last June about the
13 re-licensing I was handed one of these documents
14 (indicating), it's undated, but the meeting was on
15 June 20th, 2024. It's called Advancing the Clean
16 Energy Transition, published by Xcel Energy.

17 So on page two it has a little breakdown
18 here of our customer's energy mix, and in 2024 solar
19 energy is only 4 percent of the mix. They've had
20 decades or more to make solar energy a renewable
21 energy all over the place and we've only got 4
22 percent.

23 So with the new stuff that they want to
24 do by 2030, six more years, they are proposing that
25 they'll have 9 percent solar energy. So that's

1 really not impressive to me. That doesn't blow my
2 socks off. Wow, we're going to get 9 percent solar
3 in exchange for a hundred casks, and that brings me
4 back to the question I was going to ask you. I
5 understood that there's still an additional 15 casks
6 on the current license.

7 MS. PAM GORMAN: There's an additional --
8 we'll go from 52 up to 64.

9 MS. CHARLOTTE EASTIN: Right. 64 plus 34
10 is going to be 99 casks.

11 MS. PAM GORMAN: 98, close enough.

12 MS. CHARLOTTE EASTIN: My big issue here
13 is where is our renewable energy? What happened?
14 Why don't we have it, and now we're going to get
15 stuck with almost a hundred casks of high level
16 radioactive waste on the Mississippi River in the
17 middle of somebody's community.

18 To me this is unethical. This is an
19 unethical industry that needs to stop and we can't
20 continue to make more waste. I don't care what they
21 say about the new nuclear (inaudible), there's no
22 such thing, it's still radioactive, causes cancer
23 and birth defects.

24 So for them to continue to make more and
25 more and more and, what, in ten more years they're

1 going to come back and they're going to want 30 more
2 casks? Where does it end? We need to make it stop.
3 Make it stop. And that's why I'm here tonight to
4 say stop it.

5 JUDGE MEGAN MCKENZIE: Thank you very
6 much for your comments and your participation this
7 evening.

8 The next individual that I have, I'm
9 sorry, it's Kristen Eide --

10 MS. KRISTEN EIDE-TOLLEFSON: It's Kristen
11 Eide-Tollefson, it's K-r-i-s-t-e-n E-i-d-e, hyphen,
12 T-o-l-l-e-f-s-o-n.

13 So I first came into this process, as I
14 know Pam knows, in 1995 when Xcel had projected
15 potential siting of waste off Prairie Island in my
16 township. I was on the Environmental Quality Board
17 Task Force then, and was assigned to figure out the
18 legal and legislative implications, which was a
19 wonderful challenge.

20 I've been -- primarily our community,
21 which formed a group called Communities United For
22 Responsible Energy, our primary concern was
23 responsible nuclear waste storage, and that's been
24 the focus of our -- of I guess now almost 30 years
25 of comments that I've submitted in various dockets

1 to the Public Utilities Commission and others, and
2 that is still my primary concern, the primary
3 concern of our communities which are down river just
4 about 15 miles.

5 One of the questions that I had for Xcel
6 is how many casks of decommissioning waste you're
7 anticipating having to add to the inventory of.

8 MS. PAM GORMAN: I'm going to have Amanda
9 verify this.

10 MS. AMANDA JEPSON: So we'll be at 99
11 casks at the end of this. It's 64 equivalent casks
12 and then the new casks we're installing on the pads
13 moving forward, close to 40, so it will be 99, and
14 then we'll be adding 27 casks for decommissioning,
15 is our current estimate.

16 MS. PAM GORMAN: Thank you.

17 MS. KRISTEN EIDE-TOLLEFSON: So just
18 under another 30.

19 I have another question, let's see, in
20 some of the dockets and in this Commission decision
21 Xcel has been asked to plan out 200 years, in terms
22 of the structuring effect. I'm wondering, and I'm
23 very concerned, about the question of facility cask
24 replacement that may be necessary in that time. You
25 know, I've been reading the latest tri-annual

1 decommissioning report and I must admit I'm not as
2 focussed as I used to be reading that. I can't make
3 out where the funding is going to come from for
4 extended storage, just call it extended storage,
5 long term, indeterminant, where the funding is going
6 to come from for the cask replacement project,
7 recommended cask replacement.

8 MS. PAM GORMAN: So every 30 years we
9 file the Nuclear Decommissioning Trust Filing, and I
10 think that's what you're referring to, is the NDT
11 that we filed December 1st of 2024.

12 MS. KRISTEN EIDE-TOLLEFSON: Right.

13 MS. PAM GORMAN: So then we look out, and
14 like you said, one of the scenarios that we
15 evaluate, that no other utilities do, is how long
16 that fuel might sit there after we're
17 decommissioned, and it could be -- we do 60 year
18 scenario, 100 year, and then like I said, we are
19 unique in that we also model a 200 year scenario.

20 So in that 200 years we look at is it
21 possible that we will have to replace those casks.
22 Right now the NRC has a continued storage rule where
23 they have said -- obviously, we continue to monitor
24 them and check them for aging management, and
25 essentially we're mainly looking at the seals, but

1 do we need to replace them. The NRC now, with their
2 continued storage rule has said that they believe
3 the casks can last a hundred years or more.

4 So we know, though, in that 200 year
5 scenario we'd be looking at possible replacement if
6 needed. And, again we would continue to monitor
7 them as they sat on the pad. If that was required
8 we have built in cask replacements into that NDT
9 filing and so we would pay to recask them. However,
10 because the federal government has a legal
11 obligation to take those casks and move them, and
12 they were supposed to do that starting 1998 and
13 haven't, so we are reimbursed the cost for spent
14 fuel storage, and when we, for example, have a cask
15 project, we continue to sue the DOE, we get recovery
16 of those costs.

17 The Commission the last several times has
18 chosen to do that as a direct refund to customers.
19 And so even when we get out into those years, again,
20 the DOE obligation does not go away, although we
21 have funding in our NDT that looks out that far, we
22 would expect to continue to receive reimbursement
23 from DOE.

24 But, again, we fund that NDT assuming a
25 long runway for how long the casks can be there, and

1 that's a combination, like I said, of the NDT fund
2 and DOE cost recovery which we continue to get. And
3 we are seeing plants that have decommissioned and
4 have only, you know, ISFSI only, so basically a dry
5 cask storage pad, they do continue to get DOE
6 reimbursement for those ISFSIs, even though they are
7 decommissioned. So essentially their costs are
8 being reimbursed by Department of Energy.

9 MS. KRISTEN EIDE-TOLLEFSON: And when was
10 the first cask put on Prairie Island, what year?

11 MS. PAM GORMAN: 1995. I know you were
12 there. In 1994 the legislation happened and then we
13 loaded the first cask the next year, I believe. It
14 was either 94 or 95. We had built the pad and then
15 realized we were going to go to the legislature and
16 loaded it shortly after that.

17 MS. KRISTEN EIDE-TOLLEFSON: Was the
18 funding you're referred to -- I'm not familiar with
19 the acronym.

20 MS. PAM GORMAN: NDT, Nuclear
21 Decommissioning Trust. The NDT that we file every
22 three years.

23 MS. KRISTEN EIDE-TOLLEFSON: Oh, yes.
24 And that is not the same as the tri-annual.

25 MS. PAM GORMAN: It's the same, yes.

1 MS. KRISTEN EIDE-TOLLEFSON: It's the
2 same, okay.

3 MS. PAM GORMAN: Yes, the NDT,
4 tri-annual, file every three years, yes.

5 MS. KRISTEN EIDE-TOLLEFSON: And you were
6 thinking and you were planning for one or two
7 replacements?

8 MS. PAM GORMAN: Yeah. In the 200 year
9 scenario it may be more than two. We look at the
10 replacement, we do scenarios where we replace them
11 at least twice.

12 MS. KRISTEN EIDE-TOLLEFSON: Have you
13 done any cost estimates on that?

14 MS. PAM GORMAN: Yes, and we work with
15 our vendor on that in estimating. We project out,
16 obviously, with some rate of escalation, but, yes,
17 that is built into the model of the NDT filing.

18 MS. KRISTEN EIDE-TOLLEFSON: And do you
19 know offhand, I can Google it online but you're
20 probably a better authority.

21 MS. PAM GORMAN: On what the cost would
22 be?

23 MS. KRISTEN EIDE-TOLLEFSON: Yeah.

24 MS. PAM GORMAN: I don't have that on me,
25 we'd have to get back to you on that.

1 MS. KRISTEN EIDE-TOLLEFSON: Thank you.

2 So I guess the part of the EIS that I
3 appreciated most was the restatement from I think it
4 was the 2009 EIS noted, I'll just read it, Analysis
5 in the ECMO (ph) EIS makes it clear that without
6 monitoring and maintenance of ISFSIs and
7 institutional control to support this monitoring and
8 maintenance, radiological impacts will be
9 significantly ever.

10 The supplemental ECMO (ph) EIS released
11 by DOE in 2022 reaches similar conclusions. If
12 monitoring and maintenance do not continue for the
13 duration of spent fuel storage, then radiological
14 impacts are anticipated to be significant.

15 One of my questions has to do with the
16 concern of what kind of fiscal responsibility, given
17 all the unknowns of the future, that the state may
18 end up being burdened with. Over a 200 year period,
19 I don't know, how old is Xcel?

20 MS. PAM GORMAN: 150 years, I think.

21 MS. KRISTEN EIDE-TOLLEFSON: That's like
22 300.

23 MS. PAM GORMAN: I think we'll still be
24 around, I'm pretty sure we will be.

25 MS. KRISTEN EIDE-TOLLEFSON: It is a

1 question and it is a concern.

2 So my main request, given the focus of my
3 long term advocacy is my main request of the
4 administrative law judge is to seriously consider
5 this statement and the EIS that to ensure
6 institutional control and facilitate long term
7 maintenance of the ISFSI, Commission could, as a
8 condition on any CN amendment, or on its own motion,
9 implement a planning process or framework for
10 institutional controls of spent nuclear fuel in
11 Minnesota generally, or adapt an existing plan to
12 framework that addresses institutional control to
13 make it relatively more public facing, transparent,
14 and inclusive. Legislation adjusting the
15 appropriate relationship between interim storage
16 facilities and repositories would reduce these
17 uncertainties.

18 So I ask the judge to take very seriously
19 that potential condition on the Certificate of Need.

20 JUDGE MEGAN MCKENZIE: Thank you very
21 much for your comments and your participation today.

22 The next individual I have on the list is
23 Mr. Alan Muller.

24 MR. MULLER: Your Honor, my name is Alan
25 Muller, A-l-a-n M-u-l-l-e-r. I reside at 1110 West

1 Avenue in Red Wing.

2 This is, in some respects, a rather
3 puzzling proceeding to me, but I believe I have
4 lived in the 50 mile ingestion zone radius of
5 approximately ten nuclear power reactors in my
6 lifetime. Some of these have been in Maryland, some
7 in Pennsylvania, some have been in New Jersey. So
8 if festivities that go along with the regulation of
9 these reactors are fundamentally similar in these
10 states, at least in my experience, I suppose I've
11 attended a couple of dozen state and federal and
12 local hearings, bearing on different aspects of the
13 operation in these power reactors -- oh, I forgot, I
14 would like to be sworn. I let that go.

15 (WHEREUPON, Mr. Muller was sworn in.)

16 MR. MULLER: I should have remembered
17 that at the beginning.

18 It seems to me the notice for this
19 hearing, and the manner in which this docket has
20 been approached, seems to, unless I misunderstand
21 it, seems to look at the storage facility in
22 isolation, more or less in isolation, but in fact,
23 in order for the two reactors here to operate
24 another 20 years, this storage would have to be
25 authorized or the company would have to find

1 something else to do with the spent fuel, like haul
2 it away one cask at a time.

3 My question here really, I do have a
4 question for the Department of Commerce, does your
5 EIS, which I have not examined in any detail,
6 attempt to consider the broader impacts of continued
7 operation of these reactors?

8 MS. JENNA NESS: Yes. Chapter 6.1
9 specifically, and if you're interested I can bring
10 this paper copy over for you.

11 MR. MULLER: Thank you. Looking at this
12 expansion location, and this is noted as Xcel
13 Energy's slide paginated 15, and there's a picture
14 here of a rectangular fenced area. Does this image
15 represent the proposed expansion panel or does this
16 represent what we have now?

17 MS. PAM GORMAN: This is what we have
18 now. And, actually, if you look at the easel to the
19 left, it's just showing what future pads could look
20 like. They are not yet there, it's just where we're
21 anticipating we could put them so that we would stay
22 within the footprint. And, like I said, that's got
23 security fences around it, it's got an earth and
24 berm around it, and so those are some potential
25 locations of future pads.

1 MR. MULLER: Now, do these images
2 represent the new style of casks your company
3 proposes to use?

4 MS. PAM GORMAN: Yes. The pad is multi
5 purpose so we could use it for either.

6 MR. MULLER: Thank you.

7 When I look here at the considerations
8 slide and say the probable result of denial would be
9 an adverse affect upon the future adequacy,
10 reliability, safety or efficiency of energy supply,
11 a more reasonable and prudent alternative is nothing
12 has not been demonstrated and so on, and yet it is
13 well demonstrated that the cost of either photoable
14 tag power or wind power is less, far less, than new
15 nuclear and commonly less than the continued
16 operation.

17 In fact, we have around the country
18 several shut down nuclear plants whose owners are
19 asking and are receiving, unfortunately, extremely
20 large subsidies to continue those in operation or to
21 restart them. And it seems likely, and I haven't
22 examined this in detail, but it seems likely that
23 the cost of extending the operation of these nukes
24 another 20 years would be greater than alternative
25 sources. Electricity, usually the lowest cost of

1 electricity is conservation and efficiency
2 investments, and after that we have alternatives, as
3 I mentioned.

4 So I'm curious to know, to me this
5 summary of consideration seem credible as a piece of
6 the Applicant's business plan. But as a description
7 of where the public interests would lie, in this
8 it's very counterintuitive, it doesn't make sense to
9 me. I'm wondering, did you -- did Commerce or did
10 the Commission use any consulting resources to
11 evaluate alternatives?

12 JUDGE MEGAN MCKENZIE: Ms. Ness.

13 MS. JENNA NESS: So Chapter 8.2 of the
14 EIS goes over replacement scenarios that include
15 mixing in wind farms, and I'm just reading here,
16 natural gas combustion, solar farms, and many
17 different mixes of those, and it's based on the
18 integrated resource plan docket. So we rely on
19 that, and the Commission's decision is made on that
20 to make that analysis in our EIS. And we do go over
21 cost, we go over social cost, we go over greenhouse
22 gas emissions, land use, you know, all the impacts.

23 MR. MULLER: Is it the conclusion of you
24 and your people, for instance, that the increased
25 storage of spent nuclear fuel on this Red Wing

1 facility, which if I'm straight on my mind on it,
2 this is the only independent facility of this kind
3 in the country, is that correct?

4 MS. JENNA NESS: I can answer the first
5 part of your question but I'm not sure about the
6 second part.

7 MR. MULLER: Not to be snotty, but I
8 think that this is something that everybody involved
9 in this ought to be aware of and be considering, but
10 we want to go from 52 casks, which is the number
11 now, to 86. Inevitably that would involve some
12 radioactive discharges from the facility, if only
13 from the sky showing from the casks. Were the
14 health implications of that considered in a
15 substantial way that I can find in there?

16 MS. JENNA NESS: Yes. I can find the
17 exact chapter for you, if you'd like. Yeah, there's
18 an entire chapter on that, on radiological impacts.

19 MR. MULLER: And so was it concluded that
20 it would be no increase in radiation exposure or
21 that it was an acceptable increase?

22 MS. JENNA NESS: That it would be a
23 minimal increase and that the impacts are expected
24 to be minimal, and that's based on a third-party --
25 not test, I'm trying to think of the right

1 terminology for it, third-party report that was
2 done, and there's other reports we rely on as well
3 that we have in the footnotes. We also passed it by
4 the Minnesota Department of Health to make sure we
5 were interpreting all of the conclusions accurately,
6 among the many other things we discussed in that
7 chapter.

8 MR. MULLER: Thank you.

9 Now, one of the consequences of extended
10 operation of these reactors is the mining of more
11 uranium, obviously. Did your work there consider
12 the health impacts upon uranium miners and their
13 families and communities?

14 MS. JENNA NESS: Yeah, like we talked
15 about at the scoping meetings, that isn't part of
16 the scope of the project. That's outside the scope
17 of the project. It's kind of a downstream impact.
18 The way the project is defined is by environmental
19 review rules that the State of Minnesota kind of
20 confines it, otherwise we would be expanding it to
21 proportions that are not analyzable. And I didn't
22 make those rules, that's MEFA. It's not in the
23 scope so, no, we did not address that, again.

24 MR. MULLER: I'm not sure I understand
25 that, but there is, for example, a proposal to begin

1 or commence, recommence, the mining of uranium ores
2 in the state of Virginia, and some of that will be
3 processed and concentrated and various things done
4 to it and will be loaded in to these reactors and
5 subsequently taken out of the reactors and loaded in
6 to these casks. Is that overall -- do you feel
7 that -- I'm asking a loaded question here -- I'm
8 trying to get at the question whether those issues
9 have been addressed in a meaningful way. I don't
10 see any mention of that in the summary here.

11 JUDGE MEGAN MCKENZIE: I think what she
12 said was it's outside the scope of the proceeding.

13 MR. MULLER: I beg your pardon?

14 JUDGE MEGAN MCKENZIE: The rules that
15 define the Environmental Impact Review, I think what
16 Ms. Ness is saying that the mining of the uranium is
17 outside the scope of what the statute defines for
18 environmental review.

19 MR. MULLER: Yes, I think that's probably
20 true. And what that indicates is the inadequacy of
21 the review process to capture the actual impacts,
22 particularly the open environmental impacts, and as
23 long as major impacts of that nature are not
24 captured by the process the process is not
25 sufficiently robust to be used to justify the

1 expansion of the storage facility.

2 And I think perhaps I'll pipe down with
3 that. I might have a couple of additional comments.
4 But I'm satisfied that we don't have here a rational
5 basis for the approval or the granting of a
6 Certificate of Need for an expanded storage facility
7 in Red Wing, or probably anywhere else, but
8 particularly not here, where the community is
9 already burdened by two reactors and burdened by a
10 storage facility to be expanded, not to mention by
11 two garbage incinerators, also operated by the
12 applicant.

13 So I think that we're looking at a very
14 problematic proposal, and I'll submit some comments
15 but they'll be to the point that this is not a
16 Certificate of Need that ought to be granted.

17 JUDGE MEGAN MCKENZIE: Thank you very
18 much for your comments and your participation, sir.

19 The last individual I have, I'm going to
20 butcher this name. Ralph Rauterkus.

21 JUDGE MEGAN MCKENZIE: First, spell the
22 name for the court reporter.

23 MR. RALPH RAUTERKUS: Ralph Rauterkus,
24 first name is R-a-l-p-h, last name is
25 R-a-u-t-e-r-k-u-s. Many of questions I had tonight

1 were already addressed as well.

2 Really my concerns are on the long term
3 storage out there. In looking at the existing casks
4 and 27 more, I think you mention in here
5 decommissioning 25 casks, the first cask you said
6 went out 30 years ago, and when I -- I spent time on
7 city council for eight years from 2009 to 2016, just
8 for a little background. Back then I was told the
9 first cask had a life span or expected to last 40
10 years, I don't know if that's the old style and the
11 new style is much longer. I mean, how many old
12 style casks are out there versus the newer?

13 MS. PAM GORMAN: They were initially
14 licensed for 40 years, because that's the NRC
15 process. Now they can renewed, again, that is the
16 ISFSI pad, which is what I think you're thinking of.
17 The pad was initially licensed for 40 years and then
18 we renewed it for another 20, the ISFSI itself.

19 The casks themselves, like I said,
20 they're monitored by the NRC. We anticipate that
21 they could last a hundred years or more, that's what
22 the NRC is saying today. We're going to continue to
23 monitor them, we're going to continue to look for
24 signs of aging taking place, like we may have to
25 replace a helium seal, but essentially it's a big

1 piece of steel and bored resin around it to protect
2 the fuel inside. It's got helium cover gas on it.
3 But it's essentially a passive system sitting out
4 there, we will monitor it, but we don't anticipate
5 having to replace those or do anything other than
6 monitor, could be a hundred years, it could be
7 longer than a hundred years, we don't know. But the
8 NRC has done a lot of testing on that and they
9 license it and they monitor it, along with us.

10 MR. RALPH RAUTERKUS: Is there a proven
11 process for repackaging that cask, and have you done
12 that?

13 MS. PAM GORMAN: We have not done that.
14 Other utilities have had to bring casks back inside.
15 We would unload it into the pool, similar
16 to the way we loaded it, and load it into another
17 type of canister or cask based system, but these
18 casks, we can move them on the rail. So, I mean, as
19 we project out what the future looks like we are
20 hoping to be moving them from our facility to either
21 an interim storage facility, a permanent repository,
22 we could be moving them to a facility that recycles
23 the fuel and reuses it.

24 A lot has changed in the last 30 years.
25 We're not just looking at storage and long term

1 storage. We are looking at the possibility this can
2 be feed stock for the advanced nuclear reactors that
3 are being built. I mean, there's medical isotopes
4 that can be used. There's a lot of things that this
5 fuel can still be used to do. So there's a lot of
6 options. It could be storage, it could be
7 recycling, it could be another future with that
8 fuel.

9 MR. RALPH RAUTERKUS: Has there been any
10 of the packaging of a cask outside of a nuclear
11 power plant, you know, say they're decommissioned,
12 now they're gone. Is there anything out there where
13 they have to produce or build a new facility to do
14 that, is there one out there?

15 MS. PAM GORMAN: No. I think there are
16 seven that are ISFSI only. So there are seven sites
17 that the plants have been decommissioned themselves
18 and now it's only the dry cask storage pad. But I'm
19 not aware of any of them having to recask the seal
20 in another form or to move it. It remains there
21 and, again, it's being monitored. We were not the
22 first to load a cask, and I should mention, most
23 plants that are operating today, we have 93, have
24 some type of ISFSI, there's just a couple of them
25 that don't. We are not unique in the industry. We

1 have an ISFSI but most sites do as well.

2 MR. RALPH RAUTERKUS: I just raise those
3 questions because you think a hundred years out, you
4 know, you're going to have to repackage them at some
5 point, and that's my concern. How is that going to
6 be done? Will we have the know how? Will we have
7 the expertise to do that, if the plant is
8 decommissioned and gone.

9 MS. PAM GORMAN: And the other thing I
10 should say, I've observed this personally in France,
11 they have a hot cell facility. So they don't even
12 bring it back it in to a pool. They can use a hot
13 cell and unload a cask, because they recycle fuel,
14 so they take it out of the cask, they recycle it,
15 they're left with a bio product, but they can also
16 re-cask the fuel in the hot cell if needed. Idaho
17 National Lab has a hot cell. We know that sites
18 could build a hot cell if they needed to.

19 But, again, we don't anticipate that cask
20 would fail. I mean, it might be a seal issue that
21 we would have to replace, but we'll continue to
22 monitor it, we'll have oversight by the Nuclear
23 Regulatory Commission, along with all the other
24 sites, the 65 sites that we are monitoring today.

25 The U.S. is moving towards a consent

1 based siting program, with anticipating that they're
2 going to have regional interim storage locations,
3 and so they're moving forward with that consent
4 based siting program. And like I said, a lot of
5 conversation is changing around recycling of that
6 fuel. I mean, personally, that fuel still has a lot
7 of value in it, I think it makes sense to reuse it,
8 just like we do with most things. So we have the
9 ability to recycle that, and the technology exists.
10 The hot cells exist today, repackaging exists today,
11 recycling exists today. Those are all things that
12 we have to make a decision as a country whether or
13 not we're going to move forward with it.

14 MR. RALPH RAUTERKUS: Thank you. All my
15 other questions were asked already.

16 JUDGE MEGAN MCKENZIE: Thank you for your
17 comments and participation today, sir.

18 Is there anyone who has not spoken or
19 made a comment who would like to do so? Is there
20 anyone who already spoke who has a follow up? I'm
21 seeing a few hands. I will start with Ms. Overland,
22 since you went first.

23 MS. CAROL OVERLAND: Some of these have
24 brought up other questions.

25 I too have been doing this for 30 years

1 now and I didn't think I'd be spending my time now
2 at this age doing this again.

3 The first one, how many TN 40s are there
4 right now?

5 MS. PAM GORMAN: 52, and we will load
6 three in 2025, so we'll have 55 TN 40.

7 MS. CAROL OVERLAND: Okay. And then back
8 in 1994, in December, when we were first having that
9 NSP little committee, at that time I was still a
10 truck driver, so I was used to replacing the seals
11 on the trailer wheels. Because they're always
12 talking about the seals on the TN 40 I thought, oh,
13 seals, and it turned out -- and I asked, well, do
14 they have to be replaced and there was no answer and
15 they had to come back with an answer and it was,
16 well, they have to be replaced every 20 years. And
17 now it's 30 years later, how many have been
18 replaced?

19 MS. PAM GORMAN: Again, in the industry
20 we have not seen the need to replace them. They are
21 functioning just as they were designed to. The 20
22 year was an initial license period, like we thought
23 it might happen, that they'd need to be replaced
24 during that period of time. But what we were seeing
25 is they are performing as designed, as in day one.

1 They don't need replacement. We monitor them. We
2 are monitoring the helium pressure seal to make sure
3 that there's no -- what we're monitoring is to make
4 sure that the helium cover gas is keeping the fuel
5 covered, and so we are monitoring to look for any
6 indications that that helium is exiting the seal.
7 But we have had no issues -- actually no issues in
8 the industry as a whole.

9 Like I said, we are not the first one to
10 load a cask. There are sites that are older than
11 us, and we all are monitoring. There may have been
12 other seal replacements, I'm not familiar -- Amanda,
13 do you know if anybody has done a seal replacement?

14 MS. AMANDA JEPSON: No, I'm not aware of
15 any.

16 MS. CAROL OVERLAND: I'll dig up my thing
17 about that.

18 MS. PAM GORMAN: Again, contact me if you
19 have additional questions or I can get you some
20 vendor contacts if you want to talk to our vendor,
21 our joint task vendor, or another -- we know all the
22 vendors and we work with them, so I'm happy to
23 connect. They'd have the bigger picture of what it
24 looks like in the U.S.

25 MS. CAROL OVERLAND: And then has -- I

1 think this was covered, but has any TN 40 been
2 unloaded, first on Prairie Island and then anywhere
3 else?

4 MS. PAM GORMAN: Not at Prairie Island,
5 we have not had the need to do that. I believe it's
6 Peach Bottom that had a bolted metal cask came in
7 and we loaded, but I don't know, I need to confirm
8 that. Again, I'm happy to get back to you with some
9 information but I need to confirm. I know we have
10 not at either site.

11 MS. CAROL OVERLAND: Next question, has
12 DOE nuclear funding been frozen?

13 MS. PAM GORMAN: No. Remember, that fund
14 that we paid into, we get a judgment that says we
15 have to get reimbursed for those costs. It's not a
16 fund. I mean, this is being paid by taxpayers. So
17 we have a judge that has said that we are due those
18 costs. So we, as part of our settlement, submit our
19 costs every year and we get reimbursed by our
20 taxpayers.

21 MS. CAROL OVERLAND: So you're saying
22 there's no way that can be frozen by the feds?

23 MS. PAM GORMAN: Not that I'm aware of.
24 Again, I'm not an attorney, but not that I'm aware
25 of.

1 MS. CAROL OVERLAND: Things are happening
2 that we don't know.

3 MS. PAM GORMAN: I understand, but this
4 is a judgment fund.

5 MS. CAROL OVERLAND: Then for Commerce,
6 has the -- okay, years back, I think it was '98,
7 there was a natural gas replacement option. Has
8 that been addressed in the EIS for this?

9 MS. JENNA NESS: No, it has not been
10 addressed, because it wasn't an option in the IRP
11 proceeding and the Commission determined, I believe,
12 and correct me if I'm wrong, that that -- I'm not as
13 privy to that piece as other people at Commerce, but
14 they've determined that it's adequate and that sort
15 of study didn't need to be addressed. If I'm
16 hacking that up at all I'd appreciate some help but
17 that's why it's not in the EIS.

18 MS. CAROL OVERLAND: I thought that I had
19 put that in as a comment.

20 MS. JENNA NESS: You did, and I did look
21 into it, and I talked about it with my supervisor
22 and that's what we talked about, what I just told
23 you.

24 MS. CAROL OVERLAND: And there will be
25 something in the EIS about that, that review?

1 MS. JENNA NESS: Well, this is the final
2 EIS.

3 MS. CAROL OVERLAND: Right.

4 MS. JENNA NESS: So there's not going to
5 be any more edits, so what's in here is final,
6 unless it's determined not to be accurate.

7 MS. CAROL OVERLAND: So there's nothing
8 in there about the natural gas alternative option
9 from 1998 or so?

10 MS. JENNA NESS: No. Because we looked
11 at the replacement scenarios in the IRP.

12 MS. CAROL OVERLAND: I had thought that
13 you said that this did deal with alternatives?

14 MS. JENNA NESS: It did, yes.

15 MS. CAROL OVERLAND: But are you saying
16 the only ones that you looked at were ones within
17 the IRP?

18 MS. JENNA NESS: Correct.

19 MS. CHARLOTTE EASTIN: That's something
20 I'd like to get into.

21 MS. CAROL OVERLAND: We'll get in to that
22 in a bit.

23 MS. JENNA NESS: More IRP and Certificate
24 of Need in-depth questions, that's not my area of
25 expertise. If we need to go that route we can try

1 to get those questions answered as well.

2 MS. CAROL OVERLAND: And with that, we
3 have the opportunity to put written comments in and
4 also address the inadequacy of the EIS?

5 MS. JENNA NESS: Yes.

6 MS. CAROL OVERLAND: Regarding health
7 impacts, I know that I had submitted the work of
8 Aaron Davisson, who has been working on modeling of
9 impacts of low level radiation. Is that addressed
10 in the final EIS?

11 MS. JENNA NESS: Absolutely.

12 MS. CAROL OVERLAND: Okay. I will check
13 that out. That's all I have for now.

14 JUDGE MEGAN MCKENZIE: Who had also
15 raised their hand?

16 MS. CHARLOTTE EASTIN: This is just
17 really a quick observation. We already know that
18 there's going to be 99 casks or 98 casks at the end
19 of 2053, and now I just learned this evening there's
20 going to be an additional addition of 27 more casks
21 when the decommissioning comes, so that's 126 casks,
22 give or take a few.

23 My point is, you can leave it where it
24 is, you can move it somewhere else, you can recycle
25 it and condense it down and try and put it in a

1 smaller box, it's still radioactive. We're still
2 going to have a problem with radioactive waste that
3 is highly dangerous to health, and that is why I
4 don't care if you're going to move it around or
5 whatever you do with it, it's still going to be a
6 problem until we just say we're not going to do it
7 anymore.

8 JUDGE MEGAN MCKENZIE: Thank you very
9 much. Who else had wanted -- just remind the court
10 reporter of your name, please.

11 MS. KRISTEN EIDE-TOLLEFSON: Kristen
12 Eide-Tollefson.

13 Can anyone here clarify for me the
14 relationship between the scope of this environmental
15 review and the integrative resource plan and whether
16 or not the integrated resource plan has already
17 predetermined the legitimacy of the Certificate of
18 Need, or whether this is still an open question? I
19 didn't do the IRP this year and I'm wondering if
20 there is someone here who can explain that to me?

21 MS. KATHERINE ARNOLD: I can take this if
22 nobody else wants to.

23 Katherine Arnold from the Department of
24 Commerce.

25 So the IRP did not predetermine the

1 outcome of the Certificate of Need. This is still
2 an open contested case process, in which a decision
3 hasn't been made.

4 What the IRP process did is it ran many
5 scenarios, a number of them more of the modeling, I
6 certainly don't have that background, I just do the
7 legal stuff, but looked at different options for how
8 do we get those needs, so those models came out with
9 the answers, and the IRP, what was decided, is that
10 for planning purposes, the plan stream would be
11 extended with the understanding that this process
12 was going to proceed and it's either going to be
13 approved or not approved, but just for planning
14 purposes for the IRP that was what was decided there.

15 MS. KRISTEN EIDE-TOLLEFSON: And that
16 constrained the consideration of alternatives in
17 this proceeding?

18 MR. STEVE RATOW: Steve Ratow from the
19 Department of Commerce, R-a-t-o-w, that was a
20 decision made by EERA. We did not go tell them
21 these are the only alternatives you can consider.
22 We did our work in the resource plan, they then took
23 that into consideration and made their own
24 decisions. Does that help?

25 MS. KRISTEN EIDE-TOLLEFSON: Was that

1 formally part of the scope, that those would be the
2 only alternatives considered, was that in the scope?

3 MS. JENNA NESS: I would have to read the
4 scope to see if it was specifically outlined that
5 way, but I can tell you that the final EIS
6 definitely complies with the scope.

7 MS. KRISTEN EIDE-TOLLEFSON: Thank you.

8 JUDGE MEGAN MCKENZIE: Was there anyone
9 else who wanted to make a comment or ask a question?

10 MR. MULLER: Al Muller again. I'd like
11 to draw the court's attention to Xcel Energy slide
12 paginated 11, in which it says the 20 year extension
13 of Prairie Island is based on our recent resource
14 planning models in our 2024 to 2040 upper midwest
15 integrated resource plan, as approved by the
16 Minnesota Public Utilities Commission.

17 Okay. Now, an integrated resource plan
18 is a planning concept which seeks to treat supply
19 side resources and demand side resources
20 symmetrically. Meaning, for instance, supply side
21 resources are power plants, extended operation of
22 nuclear reactors. Demand side resources are
23 conservation and efficiency programs and such. When
24 you look at these in any kind of symmetrical
25 fashion, almost invariably the demand side resources

1 come out to be the least cost, so that if in fact
2 you do a valid integrated resource plan you may come
3 up with something approximating the least cost of
4 electricity, and in that plan you can assign dollar
5 values to health impacts and all sorts of things.
6 But the problem here is that we don't have a valid
7 integrated resource plan and process in Minnesota.
8 We have a process that consumes a lot of talented
9 people's time and yields little or nothing other
10 than a mirror image of the utility's business plan.

11 So when we say here that the
12 justification for the extended -- for this extended
13 storage facility ties back in to an integrated
14 resource plan that was entirely controlled by the
15 utility itself. It is more or less self-evidently
16 and not a valid process and not an acceptable
17 justification for proceeding with this.

18 Now, what I just said about the
19 inadequacy of the integrated resource plan and
20 process as it's carried out in Minnesota, I have
21 said a few times to the Commission and to various
22 members of the staff and nobody has ever said to me,
23 hey, you know, you're right. Because the appetite
24 for doing that doesn't seem to exist in Minnesota.
25 So we have a very complex modeling process, using

1 very expensive models, which are controlled by the
2 utility. The model runs are, and correct me if I'm
3 wrong, controlled by the utility, and so, again, the
4 outcome of the process is simply a mirror image of
5 what went in, one, it's the commission rubber
6 stamping the utility's business plan. And as such,
7 you know, my testimony here is this is no sound
8 basis for approving this extended storage operation
9 or anything else for that matter.

10 And if you were curious about the
11 consequences of it, you could look at various
12 examples of testimony from the attorney general's
13 office, which has a utility regulatory shop and has
14 shown there that Minnesota has made a transition
15 from being a relatively low electricity cost state
16 to a much higher electricity cost state. The reason
17 for that is the control of the process and the lack
18 of valid ways of addressing this sort of thing that
19 we're here to address. And I don't say that to
20 insult anybody. Xcel Energy is as cleverly managed
21 a utility as you could probably find in the country
22 and rarely seems to experience very substantial
23 opposition, certainly not from members of the
24 Commission. But I don't think there's anything in
25 here that could justify a report recommending to the

1 Commission that the Certificate of Need be granted
2 for this.

3 I could go on and on about this for a
4 long time, and I don't imagine most of the people in
5 the room want to hear it. But the point I hope I
6 made is that the whole justification for this is a
7 pile of quick sand.

8 Thank you, Your Honor, for allowing me to
9 comment further.

10 JUDGE MEGAN McKENZIE: Ms. Arnold.

11 MS. KATHERINE ARNOLD: One quick clean up
12 clarification. The most recent IRP there were three
13 modeling parties, the Department of Commerce did
14 some modeling and then a group of environment
15 organization, like the Clean Energy Organization
16 also responded.

17 MR. MULLER: You know, it's true, and
18 what -- you can go to a meeting of one of the
19 innumerable meetings, IRPs are very good for
20 generating meetings at which people jump on. But I
21 haven't seen any indication that these so-called
22 environmental groups have grasped what's happening
23 and how they're being used. Where are they? I
24 don't see any. Thank you.

25 JUDGE MEGAN McKENZIE: Thank you, sir.

1 What I've put up is the slide reminding
2 everyone how to make written comments. Again, those
3 must be received by April the 10th at 4:30 p.m. So
4 if anyone would like to make a written comment be
5 aware of the timeline and the methods for doing so.

6 As I said, all comments are given equal
7 weight, whether they are made in writing or in
8 person. So if you did not feel comfortable, I know
9 not everyone is comfortable speaking in front of a
10 group, you're more than welcome to submit a written
11 comment and I will get it and I will read it.

12 So thank you very much everyone for your
13 attendance and attention today. Public
14 participation is a very important part of this
15 process and I personally take it very seriously. So
16 thank you everyone for attending, and I hope you
17 drive safely home. With that we are adjourned.

18 (Proceedings were adjourned at 7:15 p.m.)
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1 STATE OF MINNESOTA)

2 COUNTY OF HENNEPIN)

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4
5 REPORTER'S CERTIFICATE

6 I, Jonna Schrupp, do hereby certify
7 that the above and foregoing transcript, consisting
8 of the preceding 55 pages is a correct transcript
9 of my stenographic notes of the proceedings to the
10 best of my ability.

11 Dated April 10, 2025

12
13 /s/ Jonna Schrupp
14 JONNA SCHRUPP
15 Stenographic Court Reporter
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