

BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS  
600 North Robert Street  
St. Paul, MN 55101

FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION  
121 7<sup>th</sup> Place East, Suite 350  
St Paul MN 55101-2147

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. E002/CN-24-68  
OAH Docket No. 25-2500-39971

**SURREBUTTAL TESTIMONY OF DR. STEVE RAKOW**

**ON BEHALF OF**

**THE MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES**

**MARCH 31, 2025**

SURREBUTTAL TESTIMONY OF DR. STEVE RAKOW  
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

DOCKET NO. E002/CN-24-68  
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1     **I.     INTRODUCTION**

2     **Q.     Please state your name.**

3     A.     My name is Dr. Steve Rakow.

4  
5     **Q.     Are you the same Dr. Rakow who previously submitted direct testimony on behalf of**  
6           **the Minnesota Department of Commerce, Division of Energy Resources, (Department)**  
7           **in this proceeding?**

8     A.     Yes.

9  
10    **Q.     What is the purpose of your Surrebuttal Testimony?**

11   A.     I am providing an update on the Department’s overall recommendation in this matter.

12  
13   **Q.     What was your recommendation in Direct Testimony?**

14   A.     I did not make an overall recommendation on Xcel’s CN application.<sup>1</sup> However, I did  
15           recommend, if the Petition is approved, that the Commission apply conditions similar to  
16           those specified in order point 2 of the Commission’s October 17, 2023 *Order Granting*  
17           *Application with Conditions* (Docket No. E002/CN-21-668), which specifies the ratepayer  
18           protections and a reporting requirement ordered by the Commission for a similar

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<sup>1</sup> *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. E002/CN-24-68, Petition (Feb. 7, 2024) (eDocket Nos. [20242-203189-09](#), [20242-203189-07](#), [20242-203189-05](#), [20242-203189-03](#), [20242-203189-01](#), [20242-203185-10](#), [20242-203185-09](#), [20242-203185-08](#), [20242-203185-07](#), [20242-203185-06](#), [20242-203185-05](#), [20242-203185-04](#), [20242-203185-03](#), [20242-203185-01](#)). (Hereinafter, “Petition”).

1 proceeding for the Monticello Nuclear Generating Plant.<sup>2</sup> See Ex. DOC - \_\_\_\_, at SR-D-4  
2 (Rakow Direct) for details.

3  
4 **Q. Did Xcel's rebuttal testimony object to the conditions you recommend?**

5 A. No. The Rebuttal Testimony of Mr. Krug agreed with my recommended condition.

6  
7 **II. SUMMARY OF RECOMMENDATIONS**

8 **Q. Based on your investigation, what do you recommend?**

9 A. Based upon the testimony of Ms. Dietz, Mr. Shah, Mr. Zwick, and myself, I recommend  
10 that the Commission approve Xcel's Petition subject to the conditions similar to those  
11 specified in order point 2 of the Monticello Order. See Ex. DOC - \_\_\_\_, at SR-D-4 (Rakow  
12 Direct) for details.

13  
14 **Q. Have you completed your Surrebuttal Testimony?**

15 A. Yes.

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<sup>2</sup> In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for a Certificate of Need for Additional Dry Cask Storage at the Monticello Nuclear Generating Plant Independent Spent Fuel Storage Installation in Wright County, MPUC Docket No. E002/CN-21-668, Commission, Order at Point 2 (Oct. 17, 2023). (eDocket No. [202310-199638-01](#)). (Hereinafter, "Monticello Order").