

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

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

IN THE MATTER OF THE APPLICATION BY
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

MPUC Docket No. E002/CN-21-668
OAH Docket No. 8-2500-38129

SURREBUTTAL TESTIMONY OF DR. STEVE RAKOW

ON BEHALF OF

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

APRIL 14, 2023

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1 I. INTRODUCTION

2 Q. Would you state your name, occupation, and business address?

3 A. My name is Dr. Steve Rakow. I am employed as a Public Utilities Analyst Coordinator
4 by the Minnesota Department of Commerce, Division of Energy Resources
5 (Department). My business address is 85 7th Place East, Suite 280, St. Paul,
6 Minnesota 55101-2198.

7

8 Q. Are you the same Dr. Steve Rakow who submitted Direct Testimony earlier in this
9 proceeding?

10 A. Yes.

11

12 II. PURPOSE

13 Q. What is the purpose of your testimony?

14 A. The purpose of my Surrebuttal Testimony is to update the record regarding the status
15 of the issues I raised in my Direct Testimony. Specifically, I address the Rebuttal
16 Testimony of Mr. Allen D. Krug on behalf of Northern States Power Company, d/b/a
17 Xcel Energy (Xcel).

18

19 III. ISSUE OF CONDITIONS

20 Q. What did you conclude in Direct Testimony regarding conditions?

21 A. I recommended that points 3a to 3d and 3f of the Minnesota Public Utilities
22 Commission's November 2, 2022 Order in Docket No. E002/M-20-620 be applied to

1 the Monticello Nuclear Generating Plant (Monticello) and the independent spent-fuel
2 storage installation (ISFSI) as proposed in this proceeding.¹

3
4 **Q. Did Xcel agree with your recommendation?**

5 A. Yes. The Rebuttal Testimony of Mr. Krug stated:

6 Xcel Energy views these conditions as reasonably requiring
7 the Company to report and justify variances from the
8 Project's predicted costs and benefits, in order to recover
9 the costs of the Project from customers. The Company
10 understands and agrees that it will bear the burden of proof
11 in any future regulatory proceeding related to the recovery
12 of the costs associated with the Project and will need to
13 demonstrate the reasonableness of those costs. Moreover,
14 the Company agrees to clearly account for all costs incurred
15 for the Project.

16
17 Ex. Xcel-___ at 3-4 (Krug Rebuttal).
18

19 **Q. Do you have anything further on the issue of conditions?**

20 A. No. I consider the issue of conditions to be resolved.
21

22 **IV. SUMMARY OF RECOMMENDATIONS**

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

24 A. Considering the testimony of Mr. Shah, Ms. Winner, and myself, along with the Final
25 Environmental Impact Statement, I recommend that the Commission approve Xcel's
26 certificate of need application subject to the conditions specified in points 3a to 3d
27 and 3f from Ex. DOC-___, SR-D-4 being applied to Monticello and the ISFSI.
28

¹ See Ex. DOC-___, SR-D-4 (Rakow Direct).

1 | Q. Have you completed your Surrebuttal Testimony?

2 | A. Yes.