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May 30, 2023

VIA EDOCKETS

The Honorable Eric Lipman  
Administrative Law Judge  
Office of Administrative Hearings  
PO Box 64620  
St. Paul, MN 55164-0620

**Re: *In the Matter of the Application of 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***  
**OAH Docket No. 8-2500-38129; MPUC Docket No. E-002/CN-21-668**

Dear Judge Lipman:

You requested supplemental filings regarding the impact, if any, of the recent leak at Northern States Power Company d/b/a Xcel Energy's Monticello nuclear generating plant ("Monticello") on this proceeding.<sup>1</sup> While the leak is unfortunate, the Minnesota Department of Commerce continues to recommend that the Public Utilities Commission grant a certificate of need to Xcel to expand its existing spent nuclear fuel storage facility at Monticello, subject to certain cost safeguards and reporting requirements. The Department also concludes that the final environmental impact statement ("EIS") adequately addresses the possibility of tritiated water contamination and does not currently require any supplementation.

### **CERTIFICATE OF NEED**

The Commission should grant Xcel a certificate of need for its proposed Independent Spent Fuel Storage Facility ("ISFSI") expansion because the company has demonstrated need given the applicable factors. Minn. Stat. § 216B.243, subd. 3 (2022); Minn. R. 7855.0120 (2021). Below, the Department briefly summarizes its position on each of the factors that led it to support granting a certificate of need to the company.

#### **A. Forecasted Energy and Storage Needs**

As detailed in the Department's testimony, the Commission should find that Monticello is needed to meet forecasted energy needs and that the proposed ISFSI is similarly necessary to meet forecasted storage demand arising from Monticello's continued operations.

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<sup>1</sup> FIFTH PREHEARING ORDER (May 1, 2023) (eDocket no. 20235-195441-01).

Monticello is needed to meet forecasted energy demand. Minn. Stat. § 216B.243, subd. 3(1); Minn. R. 7855.0120(A)(1). In Xcel's most recent integrated resource planning proceeding ("IRP"), the Department adjusted the company's energy demand forecast after concluding that it was systematically overstated.<sup>2</sup> Despite incorporating these downward adjustments, the Commission still concluded that "Xcel [could] pursue extending the operating life of Monticello Nuclear Generating Plant by ten years."<sup>3</sup> Ex. DOC-26 at 7 (Shah Direct). Regarding forecasted storage need, the Department's expert did not dispute Xcel's claim that it lacks space for the estimated 13 additional spent fuel storage casks required to extend Monticello's operating life or the implication of the Commission's IRP order that there is inadequate storage presently available at Monticello for extended operations. Ex. XEL-1 at 8-28, 9-5 (CN Application); Ex. DOC-25 at 4-5 (Winner Direct). Monticello also is needed in the context of Minnesota's statewide energy needs. Minn. Stat. § 216B.243, subd. 3(3); Minn. R. 7855.0120(C)(1). A review of the most recent IRPs of Minnesota's largest utilities, which serve the majority of the state, showed additional capacity is likely needed during the 2023-2028 timeframe given the transition away from coal-fired baseload generating units. Ex. DOC-26 at 8-13 (Shah Direct).

Given this analysis, continued operations at Monticello likely remain necessary to meet the state's overall, near-term energy needs.

## **B. Conservation and Efficiency Alternatives**

The Commission should find that it is unlikely that Xcel's forecasted energy need could be met through conservation and efficiency programs alone. The Commission should further conclude that this need was not generated by the company's promotional practices.

Conservation and efficiency programs are unlikely to meet forecasted energy demand. Minn. Stat. § 216B.243, subd. 3(2), (6), (8); Minn. R. 7855.0120(A)(2). During the 2019 IRP proceeding, Xcel's existing and expected conservation programs were included in the capacity expansion modeling. The modeling software also had the option to select additional conservation as a least-cost approach to meeting forecasted energy demand. Ex. DOC-24 at 9-10 (Rakow Direct). The result of this analysis, however, showed that pursuit of additional energy conservation in lieu of baseload generation would unreasonably increase system costs.<sup>4</sup> Xcel's new modeling in this proceeding came to similar results. *Id.* at 19; Ex. XEL-1 at 9-23, 9-28, 9-32 (CN

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<sup>2</sup> Xcel's most recent IRP is relevant because "the commission's resource plan decision constitutes prima facie evidence of the facts stated in the decision." Minn. R. 7843.0600, subp. 2 (2021).

<sup>3</sup> *In re 2020-2034 Upper Midwest Integrated Resource Plan of N. States Power Co. d/b/a Xcel Energy*, Docket No. E-002/RP-19-368, ORDER APPROVING PLAN WITH MODIFICATIONS & ESTABLISHING REQUIREMENTS FOR FUTURE FILINGS at 32 (Apr. 15, 2022).

<sup>4</sup> *In re 2020-2034 Upper Midwest Integrated Resource Plan of N. States Power Co.*, Docket No. E002/RP-19-368, Xcel Energy Reply Cmts., Appendix A at 10 (June 25, 2021) (eDocket no. 20216-175386-01).

Application). Given these results, conservation and efficiency efforts do not appear to be viable alternatives to the baseload generation provided by Monticello.

Xcel has not created the need for the forecasted energy or storage through promotional practices. Minn. Stat. § 216B.243, subd. 3(4); Minn. R. 7855.0120(A)(3). Instead, the Department's expert reasoned that the need for the ISFSI and related need for the continued operation of Monticello arose from Xcel's retirement of its Minnesota coal-fired generating units. Ex. DOC-25 at 35 (Winner Direct).

Given this analysis, the Department recommends that the Commission find that it is unlikely forecasted energy needs could be met through conservation and efficiency, and that this need was not generated by Xcel's promotional practices.

### **C. Alternative Facilities Not Requiring a Certificate of Need**

The Commission should find that the forecasted energy and storage needs likely cannot be met through current or planned facilities not requiring a certificate. Minn. R. 7855.0120(A)(4).

Generation alternatives not requiring a certificate of need are not a viable replacement for Monticello. All large energy facilities require a certificate of need. Minn. Stat. §§ 216B.2421, subd. 2(1), .243, subd. 3. Because Monticello is a large 671-MW baseload generating facility, plants small enough to be exempt from the CN requirement are unlikely to viable replacements. Ex. DOC-24 at 12 (Rakow Direct). The Department's 2019 IRP analysis found that extending Xcel's Prairie Island nuclear generating plant tended to be least cost of way of meeting future demand. Like Monticello, extended operations of Prairie Island would likely require a certificate for additional spent fuel storage.<sup>5</sup> But the Commission's rule only requires consideration of facilities not requiring certificates of need. As a result, Prairie Island is not a viable alternative for the purposes of the Commission's consideration of Minn. R. 7855.0120(A)(4).

Storage alternatives not requiring a certificate also are not a viable alternative to the proposed ISFSI. The construction of any "nuclear waste storage" or "nuclear waste disposal facility" would require a certificate of need. Minn. Stat. §§ 216B.2421, subd. 2(8), .243, subd. 2. In addition, the Department's expert found that neither consolidating spent fuel in the existing storage pool nor off-site storage are viable alternatives for the additional spent nuclear fuel generated by Monticello. *See* Ex. DOC-25 at 24 (Winner Direct).

Because alternative facilities both for energy generation and waste storage do appear to be viable, the Commission should find this factor weighs in favor of granting the certificate.

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<sup>5</sup> *In re 2020-2034 Upper Midwest Integrated Resource Plan of N. States Power Co.*, Docket No. E002/RP-19-368, Dep't Suppl. Cmts. at 33–40 (Oct. 15, 2021) (eDocket no. 202110-178845-01).

#### **D. Appropriateness of the Proposed Facility**

The Commission should find that the proposed facility—both Monticello itself and the proposed ISFSI—are appropriate in comparison to reasonable alternatives based on efficiency, size, type, and cost.

Monticello is an appropriate option for meeting forecasted demand in comparison with reasonable alternatives. Minn. R. 7855.0120(B)(1), (2). Monticello is a large 671-MW baseload unit that operates 24-hours a day for weeks at a time. Given these characteristics, the Department's expert concluded that the only plausible alternatives are a new nuclear power or coal plant. Ex. DOC-24 at 12 (Rakow Direct). However, there is currently a state law prohibition on the construction of new nuclear power generating units and coal-fired generation has fallen into disfavor due to environmental and cost concerns. *Id.* at 12–13; Minn. Stat. § 216B.243, subd. 3b(a). The Department also considered alternatives to the proposed ISFSI based on efficiency, size, type, and cost, concluding that the available alternatives would be more expensive, provide less storage than needed, or create additional radiation exposure risks for workers. Ex. DOC-25 at 7-24 (Winner Direct). While not directly addressing the expected reliability of the proposed ISFSI relative to other alternatives under Minn. R. 7855.0120(B)(4), the Department noted that Xcel must select from technologies approved by the federal Nuclear Regulatory Commission (“NRC”) that meet minimum safety and reliability requirements.<sup>6</sup> *Id.* at 6.

Given these considerations, the Commission should conclude that continued operations at Monticello and the proposed ISFSI are appropriate in comparison to reasonable alternatives.

#### **E. Natural and Socio-Economic Environmental Impacts**

The Commission should find that continued operations at Monticello and the proposed ISFSI's natural and socio-economic environmental effects compare reasonably with alternatives. The Commission also should find that these effects are more favorable to society than the consequences of denying the certificate. Minn. R. 7855.0120(B)(3), (C)(2)–(4).

The final EIS found that Monticello's continued operation is expected to create few impacts. Non-radiological impacts are related primarily to the use of river water for cooling. These impacts are anticipated to be minimal. The plant also generates few greenhouse gases emissions. Radiological impacts likewise are anticipated to be minimal Ex. DOC-18 at 53–58 (Final EIS). In addition, Xcel's capacity expansion modeling, despite incorporating Commission-approved externality values, still favored the plant over alternatives. Ex. DOC-24 at 17 (Rakow Direct). The proposed ISFSI also is expected to create minimal impacts. The proposed ISFSI will occur within the existing industrial site. Ex. DOC-18 at 33–34 (Final EIS). According to Xcel, the proposed ISFSI will create common construction wastes that will require appropriate disposal as well as fugitive dust generated by earthmoving equipment. Xcel also states that spent fuel storage itself will not generate any gaseous or particulate emissions. Ex. XEL-1 at 12-6, 12-7 (CN Application).

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<sup>6</sup> U.S. Nuclear Regulatory Comm'n, *Storage of Spent Nuclear Fuel* (last updated Jan. 9, 2023), <https://www.nrc.gov/waste/spent-fuel-storage.html>.

In comparison, the alternatives identified by the capacity expansion modeling would likely generate more significant impacts through additional greenhouse gas emissions, and flora and fauna impacts. Ex. DOC-18 at 79–82 (Final EIS).

Because continued Monticello operations and the proposed ISFSI are expected to only have minor incremental impacts, and alternatives would likely have more significant impacts, the Commission should find these factors support granting the certificate.

#### **F. Consumer Protections**

Xcel estimated that construction of the expanded ISFSI will be about \$72.1 million in 2020 dollars. Ex. XEL-1 at 8-28 (CN Application). To protect ratepayers from cost overruns and hold Xcel accountable for its representations, the Commission should adopt the cost cap provisions discussed in Dr. Rakow’s direct testimony. These types of conditions are reasonable and commonly imposed by the Commission in CN proceedings.<sup>7</sup> Ex. DOC-24 at 23 (Rakow Direct). The Department also understands that Xcel does not object to these conditions. Ex. XEL-11 at 3–4 (Krug Rebuttal).

### **RESPONSE TO XCEL’S TRITIUM LEAK**

Based on Xcel’s supplemental response and the record as a whole, the Department still recommends that the Commission grant the company a certificate of need. The Department also concludes that the final EIS remains adequate and does not currently require a supplement. Finally, the Department recommends that the Commission require Xcel to make quarterly filings describing its remediation activities.

#### **A. Impact on Certificate of Need Recommendations**

Following its review of Xcel’s supplemental filing, the Department continues to recommend that the Commission grant Xcel a certificate of need for the proposed ISFSI expansion. *See* Xcel Suppl. Sub. (May 15, 2023) (eDocket No. 20235-195855-02); Minn. Stat. § 216B.243, subd. 3; Minn. R. 7855.0120. While the tritiated water leak may potentially implicate several subfactors related to the effects of the proposed facility on natural and socioeconomic environments relative to alternatives, Minn. R. 7855.0120(B)(3), (C)(2), this leak event does not fundamentally alter the Department’s position. As addressed in more detail below, the Department accounted for this type of risk when preparing the EIS. In turn, by relying on the EIS’s assessment of the project’s natural and socioeconomic effects, the risks posed by radioactive effluence are embedded into the Department’s original CN analysis. Ex. DOC-24 at 17-18 (Rakow Direct); Ex. DOC-25 at 7-24 (Winner Direct). To that end, the Department’s experts concluded that continued Monticello operations facilitated by the ISFSI expansion would have “minimal impacts” and reasonable alternatives have not been established through this proceeding. Ex. DOC-24 at 17

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<sup>7</sup> *See, e.g., In re Xcel Energy’s Purchase and Sale Agreements: Northern Wind & Rock Aetna Wind Repowering Projects*, Docket No. E-002/M-20-620, ORDER (Nov. 2, 2022) (eDocket no. 202211-190368-01).

(Rakow Direct); Ex. DOC-25 at 24 (Winner Direct). To the extent that Xcel's actions precipitating the leak or its subsequent remediation efforts are imprudent, those should be addressed in a separate proceeding.<sup>8</sup> As such, the Department's recommendations and conclusions are limited solely to whether a certificate of need should be granted for the proposed ISFSI expansion.

## **B. Adequacy of Environmental Impact Statement**

The Department prepared an EIS for Xcel's proposed ISFSI expansion. Minn. Stat. § 116C.83, subd. 6(b) (2022). An EIS must contain "a thorough but succinct discussion of potentially significant direct or indirect, adverse, or beneficial effects," including "[e]nvironmental, economic, employment, and sociological impacts." Minn. R. 4410.2300(H) (2021). The final EIS prepared by the Department meets these requirements with respect to the risk of tritiated water discharge.

The Department addressed the possibility of radioactive effluence contaminating groundwater during EIS preparation. In its EIS scoping decision, the Department expressly committed to addressing possible radiological impacts to the public both under normal operating conditions and in the case of an accident. The Department also committed to addressing the potential impacts to water resources and public health. *See* Ex. DOC-9 at 4-5 (EIS Scoping Decision). The final EIS, in turn, discussed the possibility that "[m]embers of the public could receive a radiation dose from the MNGP's radioactive effluents by ingesting radionuclides . . . [through] drinking water." Ex. DOC-18 at 56 (Final EIS). Based on Xcel's annually filed Radioactive Release Reports, the final EIS explained "[e]stimated radiation doses to the general public from radioactive effluents from the MNGP are minimal. . . . indistinguishable from background radiation, and within NRC standards." *Id.* at 56-57. Based on reporting between 2009 and 2020, the final EIS also noted that radiation exposure had been "essentially stable." *Id.* The final EIS further considered the risk of radiation exposure resulting from off-normal or accident conditions. Relying on the NRC's probabilistic risk assessment performed for Monticello, assuming monitoring and maintenance, the final EIS explained that the radiological impacts from any off-normal or accident conditions at Monticello that might occur during an additional ten years of operation are anticipated to be within NRC standards and are not anticipated to be significant. Ex. DOC-18 at 57-58 (Final EIS).

Because the final EIS "addresses the potentially significant issues and alternatives raised in scoping," including those related to radioactive effluents like tritiated water, the Department issued an order in February 2023 determining that the final EIS for Xcel's CN application is adequate. Ex. DOC-21 (EIS Adequacy Order); Minn. R. 4410.2800, subp. 4 (2021). At the same time, based on the final EIS, the Department issued an order determining that Xcel had demonstrated that the design of the ISFSI is such that it can be reasonably expected that the operation of the ISFSI will not result in groundwater contamination exceeding the standards established in Minn. Stat. § 116C.76, subd. 1(1)-(3). Ex. DOC-22 (Groundwater Order).

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<sup>8</sup> *See, e.g., In re N. States Power Co. d/b/a Xcel Energy's Petition for Approval of its 2023 Annual Fuel Forecast and Monthly Fuel Cost Charges*, Docket No. E-002/AA-22-179.

While the Department appreciates the concerns raised during the public hearing, it is unnecessary to supplement the final EIS at this time. Pub. Hrg. Tr. at 28-29 (Mar. 29, 2023) (Heinrichs). An EIS must be supplemented when “there is substantial new information or new circumstances that significantly affect the potential environmental effects from the proposed project that have not been considered in the final EIS or that significantly affect the availability of prudent and feasible alternatives with lesser environmental effects.” Minn. R. 4410.3000, subp. 3(A)(2). In this instance, the Department expressly considered radioactive effluents risks including drinking water with tritium levels exceeding NRC standards in the final EIS. Ex. DOC-18 at 56-58 (Final EIS). The recently reported leak also does not affect the availability of prudent and feasible alternatives. Capacity modeling demonstrates that the energy generated by Monticello is needed to meet the state’s energy demand. Alternative baseload generating facilities, moreover, such as a new nuclear generating unit or coal-fired generating unit would respectively present similar groundwater concerns or be incompatible with the state’s carbon-free standards. 2023 Minn. Laws ch. 7 § 10 (amending Minn. Stat. § 216B.1691); Ex. DOC-24 at 12, 14–17 (Rakow Direct). This leak event also does not change the availability of alternatives to the proposed ISFSI expansion. Accordingly, the final EIS does not need to be supplemented at this time.<sup>9</sup>

### C. Remediation Reporting

Given the concerns expressed during the public comment period, the Department recommends that the Commission require Xcel to file quarterly reports describing its remediation activities, including groundwater monitoring and treatment as a condition on any certificate of need approval for the project. Xcel should continue to file such reports until the company determines the leak has been remediated. The Department also recommends that Xcel describe in its reports the standards that will be used to determine when the leak has been remediated.

Thank you for your attention to this matter.

Sincerely,

/s/ **Richard Dornfeld**

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<sup>9</sup> Other state regulators, including the Minnesota Department of Health and Pollution Control Agency, will continue to have authority over Xcel should any public health matters emerge from the leak.





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**MPUC Docket No. E-002/CN-21-668**  
**OAH Docket No. 8-2500-38129**

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