

Rebuttal Testimony
Christopher J. Shaw

Before the Minnesota Public Utilities Commission
State of Minnesota

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
Prairie Island Nuclear Generating Plant Independent Spent Fuel Storage Installation

Docket No. E002/CN-24-68
Exhibit____(CJS-2)

Resource Planning

March 17, 2025

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND TITLE.

A. My name is Christopher J. Shaw. I am currently the Manager of Regulatory Policy for Northern States Power Company d/b/a Xcel Energy (Xcel Energy or the Company). Prior to accepting my current role, I was Director of Resource Planning for Xcel Energy Services, Inc. (XES or Service Company), which supports the Xcel Energy operating companies, including Northern States Power Company.

Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS PROCEEDING?

A. Yes. I filed Direct Testimony on behalf of Xcel Energy supporting the Company's Application for a Certificate of Need (Application) to expand the existing Integrated Spent Fuel Storage Installation (ISFSI) at the Prairie Island Nuclear Generating Plant (Prairie Island Plant or the Plant). The Plant is currently slated to operate until 2033/34, and the proposed expansion of the Plant's ISFSI will enable the Plant to operate an additional 20 years through 2053/54. If the ISFSI is not expanded, the Prairie Island Plant would need to close in 2034, and the Company would need to replace the substantial capacity and energy it provides to the NSP System with other resources.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. My Rebuttal Testimony responds to the Direct Testimony filed by the Minnesota Department of Commerce -- Division of Energy Resources (Department), the only other party filing testimony in this matter. I provide an update regarding the status of the Settlement Agreement between Xcel

1 Energy and parties filed in Docket Nos. E002/CN-23-212¹ and E002/RP-24-67,²
2 as it relates to the Company's proposal to extend the life of the Prairie Island Plant
3 in its 2024-2040 Upper Midwest Integrated Resource Plan (2024 IRP) Docket, as
4 discussed in the Direct Testimony of Department witness Dr. Steve Rakow.

5
6 **II. 2024-2040 UPPER MIDWEST IRP**
7 **SETTLEMENT AGREEMENT**
8

9 Q. HAS THE COMMISSION MADE A DECISION WITH RESPECT TO THE SETTLEMENT
10 AGREEMENT REGARDING THE EXTENSION OF THE PRAIRIE ISLAND PLANT IN
11 THE COMPANY'S 2024 IRP DOCKET?

12 A. Yes. Although the Commission has not yet issued an Order in the Company's
13 2024 IRP Docket, the Commission held hearings on February 18 and 20,
14 2025, and approved the portions of the Settlement Agreement related to the
15 extension of the Prairie Island Plant. Specifically, the Commission authorized
16 the Company to pursue the extension of the operating life of the Prairie Island
17 Plant Units 1 and 2 to 2053 and 2054, respectively, for planning purposes.

18
19 The Company will file in this Docket the Commission's Order on the
20 Company's 2024 IRP once it is issued.
21

22 Q. WHAT STANDARDS GOVERN THE COMMISSION'S CONSIDERATION OF AN IRP?

23 A. Under Minn. R. 7843.0300, subp. 3, resource options and resource plans must
24 be evaluated on their ability to:

¹ *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, MPUC Docket No. E002/CN-23-212, Settlement Agreement (Oct. 2, 2024).

² *In the Matter of Northern States Power Company d/b/a Xcel Energy's 2024-2040 Integrated Resource Plan*, MPUC Docket No. E002/RP-24-67, Settlement Agreement (Oct. 2, 2024).

- 1 A. maintain or improve the adequacy and reliability of utility service;
2 B. keep the customers' bills and the utility's rates as low as practicable,
3 given regulatory and other constraints;
4 C. minimize adverse socioeconomic effects and adverse effects upon the
5 environment;
6 D. enhance the utility's ability to respond to changes in the financial, social,
7 and technological factors affecting its operations; and
8 E. limit the risk of adverse effects on the utility and its customers from
9 financial, social, and technological factors that the utility cannot
10 control.

11
12 Q. ARE THESE STANDARDS ALIGNED WITH THE CRITERIA THE COMMISSION
13 CONSIDERS IN A CERTIFICATE OF NEED PROCEEDING SUCH AS THIS?

14 A. The two standards are not completely aligned, but both standards take into
15 consideration the adequacy and reliability of energy supply, cost, and
16 socioeconomic and environmental effects. Thus, while the Commission's
17 decision in the 2024 IRP Docket does not approve the expansion of the ISFSI
18 or the extension of the Prairie Island Plant's operating life, it does indicate that
19 the extension of the Plant's life is an essential piece of the Company's plan
20 that was found to satisfy the IRP criteria.

21
22 **III. CONCLUSION**

23
24 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

25 A. Yes, it does.