

From: Heather Westra <heatherjwestra@gmail.com>

Sent: Friday, January 15, 2021 2:30 PM

To: Staff, CAO (PUC) <consumer.puc@state.mn.us>; MN_PUC_PublicAdvisor <publicadvisor.puc@state.mn.us>

Subject: Comments on Docket E002/RP-19-368

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Attached please find a cover letter and comment letter regarding Xcel Energy's Integrated Resource Plan (E002/RP-19-368).

Sincerely

Heather Westra

Shelley Buck
President

Johnny Johnson
Secretary



Lucy Taylor
Vice President

Valentina Mgeni
Treasurer

Michael Childs Jr.
Assistant Secretary/Treasurer

January 13, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: *Comments of the Prairie Island Indian Community*
Docket No. E002/RP-19-368

Dear Mr. Seuffert:

Attached, please find comments from the Prairie Island Indian Community, a federally recognized Indian tribe, regarding Northern States Power Company d/b/a Xcel Energy's (Xcel or the Company) 2019 Integrated Resource Plan (IRP), Docket No. E002/RP-19-368.

Please feel free to contact Jessie Seim, General Counsel, (651) 385-4137 with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Shelley Buck".

Shelley Buck
Tribal Council President

STATE OF MINNESOTA
Before the
PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Northern States Power Company (d/b/a Xcel Energy) to the Minnesota Public Utilities Commission Petition for Approval of its 2020-2034 Upper Midwest Integrated Resource Plan, DOCKET No. E002/RP-19-368.

INTRODUCTION

The Prairie Island Indian Community (“Community”), respectfully submits these Initial Comments in response to Xcel Energy’s (“Plant”) Petition for Approval of its 2020-2034 Upper Midwest Integrated Resource Plan (IRP).

Because of the close proximity of the Prairie Island Nuclear Generating Plant (PINGP) units 1 and 2 and its Independent Spent Fuel Storage Installation (ISFSI), the Community has a compelling interest in ensuring that we are engaged in any proceedings at the State and Federal levels.

The Prairie Island Indian Community is a federally recognized Indian tribe organized under the Indian Reorganization Act of 1934. The Tribe’s Reservation is located on the ancestral homeland of the Mdewakanton Dakota on Prairie Island, which is formed at the confluence of the Vermillion and Mississippi Rivers in southeastern Minnesota (approximately 35 miles southeast of the Twin Cities of Minneapolis and St. Paul, Minnesota). The Mdewakanton, “those who were born of the waters,” have lived on Prairie Island for countless generations. The Tribe’s current land base (including both trust and fee lands) has grown through various federal acts, beginning with the original reservation land purchase of 120 acres in 1889, and

direct purchases by the Tribal Council, and now totals over 4,500 acres (including both land and water).

The Prairie Island Indian Community is governed pursuant to its Constitution and By-Laws, adopted by tribal members on May 23, 1936, and approved by the Secretary of the Interior on June 20, 1936. The Constitution and By-laws provide that the Community Council (sometimes referred to as the “Tribal Council”) shall be the governing body for the Community. The five-member Tribal Council consists of a President, Vice-President, Secretary, Treasurer, and Assistant Secretary/Treasurer.

The PINGP has been a constant source of concern to the PIIC since it went on-line in the early 1970’s. The tribe had no role in the siting of the power plant. Did not benefit from the plant’s construction nor benefits from its continued operation, such as through job creation or an expanded tax base. In fact, there were negative impacts to the tribe as a result of the PINGP’s construction--several important archaeological sites were damaged or destroyed. In 1979, there was a steam generator tube rupture at the PINGP that resulted in a release of radiation to the surrounding atmosphere, causing great concern for PIIC and the surrounding community. These events, as well as the indefinite storage of spent nuclear fuel, continue to be of great concern to the Prairie Island Indian Community. There is no issue more important to the PIIC than the PINGP and ISFSI.

The Community intends to take an active role in this IRP, as well as future Resource Plans and related dockets. To that end, the Prairie Island Indian Community participated in several of Xcel's stakeholder engagement workshops as well as the host community impacts study.

Xcel's 2020-2034 Resource Plan articulates the company's goals in their Preferred Plan:

- a complete transition away from coal-fired generation by 2030;
- adding at least 4,000 MW of cumulative utility-scale solar resources by 2034, with the first in 2025;
- replacing (not increasing above current levels) about 1,200 MW of wind that will expire by 2034 through repowerings and/or contract extensions;
- operating the Monticello nuclear unit through 2040, 10 years longer than its current license;
- building the approximately 800 MW Sherco CC located in Becker, Minnesota in the mid-2020s;
- achieving energy efficiency savings levels ranging from approximately 2% - 2.5% annually, based on the 2018 Minnesota Energy Efficiency Potential Study; and
- adding 400 MW of incremental demand response (DR) by 2023, consistent with the Commission's 2015 IRP Order.

Given Xcel's ambitious carbon reduction goals—80 percent by 2030 and 100 percent by 2050—it is clear to us that the operation of the PINGP 1 and 2 beyond 2033 and 2034 is key to meeting those goals. This point is reinforced by Xcel's statement in the IRP, "Our nuclear fleet is therefore critical to meeting our "80-by-30" goal and maintaining that level into the future." Indeed, Xcel's nuclear plants generate about half the carbon-free energy for its Upper Midwest customers.

The question of subsequent license renewal for the PINGP 1 and 2 was discussed at length in the MN PUC Staff Briefing Paper in advance of the October 17, 2019 Commission meeting. Xcel did not include license renewal for Prairie Island 1 and 2 because the Company believes it is an issue that can wait until its next IRP, which will be submitted sometime in the mid-2020:

"Given that our operating licenses for Prairie Island run until 2033 and 2034, we believe there is sufficient time to address the future of that plant in upcoming resource plans. Additionally, we believe there is a need for additional outreach and discussions with the Prairie Island Indian Community (emphasis added) and Red Wing before we determine the future for Prairie Island beyond 2034. We, therefore, have not conducted any detailed analyses of costs associated with a license extension of one or both units at Prairie Island."

The Department of Commerce (the Department) also inquired about the process for a possible license extension of the PI units, to which Xcel responded:

"We will evaluate a license extension at Prairie Island in our next resource plan, which we anticipate filing in early-to-mid 2020s. If the Company decides to seek a life extension for one or more units at Prairie Island, we would intend to comply with the five-year safe-harbor. That would require an SRL application to be submitted to the NRC no later than mid-2028 for Unit 1 and mid-2029 for Unit 2.

As Xcel stated, they did not include PINGP license extension because a decision on that will be in the next IRP (for 2024-2039, submitted sometime in the mid-2020's). We want to ensure that the PIIC is at the table when discussions on whether to renew (for a second time) the operating licenses for the PINGP 1 and 2.

Subsequent License Renewals

In the United States, 88 of the 96 operating nuclear power plants have already received their first 20-year license renewal. The NRC is in the final stages of approving a subsequent 20-year license renewal for the Turkey Point reactors in Florida, for a total operating life of 80 years. Other plants going through the subsequent renewal process include Peach Bottom 2 and 3 in Pennsylvania, and Surry 1 and 2 and North Anna 1 and 2 located in Virginia. It is anticipated that other plants will follow. The NRC is also planning two public meetings to discuss the possibility of extended license terms beyond 60 years to 80 years (January 21, 2021 and February 18, 2021).

By the next IRP (mid-2020's) there should be some data and operating experience that could provide insight into any technical issues or concerns related to subsequent renewals. Xcel should be requested to provide general information needed on subsequent license renewals, such as:

- Planned major investments in to the PINGP 1 and 2.
- Have aging management issues be identified? If so, what are they?
- Expectations regarding future nuclear workforce.
- Cyber-security issues or concerns, as plants move from analog to digital systems.
- True comprehensive cost-benefit analysis—that includes potential environmental and economic impacts to the PIIC and Treasure Island.
- How much additional spent nuclear fuel will be generated over a 10- or 20-year period?
- What is the expectation that sent fuel stored on-site will be removed during the next IRP time period?
- What additional State permits or Certificates of Need or federal licenses will be required?

The Community appreciates the opportunity to submit these Initial comments and looks forward to working closely with the Commission, the Department, Xcel, and others ensure that decisions regarding the future of the Prairie Island Nuclear Generating Plant are well considered and in the best interests of the Prairie Island Indian Community and all Minnesotans.