



414 Nicollet Mall  
Minneapolis, MN 55401

June 17, 2021

—Via Electronic Filing—

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: REPLY COMMENTS  
PRAIRIE ISLAND FUEL STORAGE  
DOCKET NO. E002/CN-08-510

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments to the Minnesota Public Utilities Commission (Commission) regarding the Company's planned change to the Certificate of Need authorizing spent fuel storage at the Prairie Island Nuclear Generating Plant at the Independent Spent Fuel Storage Installation.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) or (612) 330-6064 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA  
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosure  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
D/B/A XCEL ENERGY FOR  
CERTIFICATION OF NEED FOR  
ADDITIONAL DRY CASK STORAGE AT  
PRAIRIE ISLAND NUCLEAR GENERATING  
PLANT

DOCKET NO. E002/CN-08-510

**REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments to the Minnesota Public Utilities Commission regarding the Company's planned change to the spent fuel storage at the Prairie Island Nuclear Generating Plant at the Independent Spent Fuel Storage Installation (ISFSI).

Both the Minnesota Department of Commerce, Energy Environmental Review and Analysis (EERA) and the Minnesota Department of Commerce, Division of Energy Resources (DER) filed Comments. We thank them for their participation and involvement in the docket and respond to each below.

**REPLY COMMENTS**

**A. DOC-EERA Comments**

EERA stated they found that our request "represents a substantial change to the Prairie Island ISFSI that could affect the potential environmental effects at the ISFSI," and that they believe the 2009 Prairie Island final EIS should be supplemented. Specifically, EERA cites three issues for which they would like additional information: (1) non-radiological impacts, (2) radiological impacts, and (3) environmental justice.

While we do not believe our request represents a substantial change to the ISFSI as our proposal merely seeks to change the type of storage container we use for some of the spent fuel to be stored at the ISFSI, we appreciate EERA's position. Accordingly, we will work with them to supplement the EIS.

## **B. DOC-DER Comments**

DER recommended that the Commission approve the petition with the following conditions:

*DOC-DER agrees with Xcel that the Company should be required to make a filing providing the Commission with information regarding the selection process and its outcome. DOC-DER recommends the Commission require the following types of information be included in the filing:*

- a. a copy of the request for proposals (RFP);*
- b. a copy of an independent auditor's report regarding the RFP process;*
- c. information regarding how the RFP was advertised;*
- d. a statement of the evaluation criteria used by the Company;*
- e. an overview of each proposal received in response to the RFP—at a minimum the overview should include:*
  - a cost estimate; and*
  - how the casks will facilitate transportation out of state to a permanent or interim storage facility as soon as feasible;*
- f. the Company's evaluation of each proposal; and*
- g. the Company's ultimate determination regarding the RFP and resulting proposals.*

We agree with DER's suggestion that we make a filing providing information about the cask selection process and outcome. We also agree that the types of information suggested by DER for inclusion in the filing are appropriate with one exception: the use of an independent auditor for this RFP process.

For a procurement of this type, where Xcel Energy is not bidding, we would not use an independent auditor. The use of an independent auditor has generally been used to negate any potential conflicts of interests in the Modified Track 2 process, where Xcel Energy itself is bidding into an RFP. Here, instead, the RFP would simply be run by an internal team of Xcel Energy employees with specific knowledge about the Prairie

Island nuclear plant, spent fuel, and cask technology, who would evaluate bids from third parties.

DER's September 12, 2016 Supplemental Comments filed in our last Integrated Resource Plan (IRP) (Docket No 15-21) notes the potential conflict of interest from bidding into our own RFP as a rationale for the auditor on p. 10:

*To address the first disadvantage, the Department notes that the potential conflicts created by having Xcel perform the initial analysis and file the final report could be mitigated through several measures. First, Xcel's proposal includes the use of an independent auditor, as is done in the current Track 1 process. Second, use of the Commission's comment and reply comment process after Xcel makes the filing containing the Company's preferred proposals should mitigate bias in the analysis. For example, it should be far less expensive for bidders to file comments indicating their issues with Xcel's analysis under the proposed process than to participate in the current Track 2 process.<sup>8</sup> Third, Xcel's reply comments indicate that "We have already taken steps internally to segregate employees working on a self-build proposal from the employees overseeing the RFP process." The Department concludes that the above three steps should be sufficient to mitigate any issues regarding Xcel evaluating its own proposal against IPP-provided alternatives and ensure a reasonably fair process.*

Because we will not be bidding, there is no conflict of interest and no reason to engage an independent auditor to perform this review. Accordingly, we agree with all of DER's filing recommendations but the requirement for an independent auditor.

### **CONCLUSION**

Xcel Energy appreciates the opportunity to provide Reply Comments in this Docket.

Dated: June 17, 2021

Northern States Power Company

## CERTIFICATE OF SERVICE

I, Crystal Syvertsen, hereby certify that I have this day served copies of the foregoing document on the attached lists of persons.

xx by depositing a true and correct copy thereof, properly enveloped  
with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**Docket Nos.        E002/CN-08-510**  
**XCEL ENERGY'S MISCELLANEOUS SERVICE LIST**

Dated this 17<sup>th</sup> day of June 2021

/s/

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Crystal Syvertsen  
Regulatory Administrator

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