

June 17, 2022

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

RE: Xcel Energy Request for a Change in Spent Fuel Storage Technology
Prairie Island Nuclear Generating Plant
Docket No. E002/CN-08-510

Dear Mr. Seuffert,

Department of Commerce, Energy Environmental Review and Analysis (EERA) staff provides these comments in response to the Commission's notice of May 31, 2022, concerning Xcel Energy's request for a change in spent fuel storage technology at the Prairie Island nuclear generating plant. Specifically, EERA staff addresses what conditions, if any, should be included in a Commission order regarding the request.

EERA staff has prepared a supplemental environmental impact statement (SEIS) for Xcel Energy's proposed change in spent fuel storage technology. During preparation of the SEIS, EERA staff received public comments suggesting mitigation measures related to Xcel Energy's request. These mitigation measures are noted in the final SEIS. They include:

- The conditions proposed by the Department of Commerce, Division of Energy Resources requiring Xcel Energy to file the results of its competitive bidding process with the Commission.
- A condition requiring Xcel Energy to file: (1) the results of its application to the Nuclear Regulatory Commission (NRC) for a transportation license for the TN-40HT cask and (2) the transportation license for any cask or canister selected for use at Prairie Island through Xcel Energy's competitive bidding process.
- A condition requiring Xcel Energy to file those documents made available for or provided to the NRC for use of a cask or canister other than a TN-40HT cask at Prairie Island.
- A condition requiring the Commission to implement a planning process or framework for institutional control of spent nuclear at Prairie Island (or in Minnesota, generally) or adapt an existing planning process or framework that addresses institutional control to make it relatively more public-facing, transparent, and inclusive.

EERA staff believes that these mitigation measures are reasonable and appropriate conditions on any Commission approval of Xcel Energy's request.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Kirsch". The signature is fluid and cursive, with the first name "Ray" and last name "Kirsch" clearly distinguishable.

Ray Kirsch
Environmental Review Manager