



414 Nicollet Mall
Minneapolis, MN 55401

May 8, 2009

Bill Storm
Minnesota Department of Commerce
85 7th Place, Suite 500
St. Paul, MN 55101-2198

RE: CERTIFICATES OF NEED FOR THE PRAIRIE ISLAND NUCLEAR
GENERATING PLANT FOR EXTENDED POWER UPRATE, ADDITIONAL
DRY CASK STORAGE AND SITE PERMIT APPLICATIONS – COMMENTS –
DRAFT EIS

DOCKET NOS. E002/CN-08-509, E002/CN-08-510 AND E002/GS-08-
690

Dear Mr. Storm:

Northern States Power Company, a Minnesota corporation (“Xcel Energy” or “Company”) offers these comments on the Draft Environmental Impact Statement (“DEIS”) prepared by the Department of Commerce, Office of Energy Security (“OES”) for the Prairie Island Nuclear Generating Plant Additional Dry Cask Storage and Extended Power Uprate Certificate of Need dockets. We believe the DEIS provides accurate descriptions of the Additional Dry Cask Storage and Extended Power Uprate projects and a realistic and thorough review of the potential environmental impacts of the projects.

The DEIS is well organized and presents information that will assist decision makers. Xcel Energy has two primary comments regarding the DEIS and they related to the recognition of our March 20, 2009 Supplemental filing and the discussion on the Socioeconomic benefits of the proposed additional dry casks to support life extension. The remainder of our comments consist primarily of a list of specific edits/corrections with page, paragraph and line references.

Supplemental Filing

The DEIS released for comment is dated March 17, 2009 and was published in the EQB Monitor on April 20, 2009. Xcel Energy made a Supplemental filing in both the Additional Dry Cask Storage and Extended Power Uprate Dockets on March 20, 2009. Thus, any updated information provided in the Supplemental filing is not yet reflected in the DEIS. Although the Supplemental filing does not provide information that will affect the description or analysis of the potential environmental impacts provided in the DEIS, we believe information in the Supplemental filing should be referenced in the final EIS to provide updated reports on the proposed projects.

In our comments we have tried to update specific information affected by the Supplemental filing where noticed. However, we encourage the OES to review the Supplemental filing for any additional updates that may be necessary. Examples of areas where edits were made are in reference to Surplus/Deficit tables, PVRR analysis tables, DSM commitments and emission levels due to alternatives.

Socioeconomic Impacts

Extended Power Uprate (Docket 4220 E002/CN-08-509)

The socioeconomic impacts resulting from implementing the extended power uprate are significantly different than those resulting from the approval of the additional dry casks to support the continued operation of the plant. The extended power uprate will not result in a sizeable increase in workers during construction of upon implementation. Since most of the work will be done during the scheduled refueling outages, there will be many additional workers already on-site. However, the significant investment in the power uprate will provide socioeconomic benefits many years into the future. For instance, our estimate shows that the City of Red Wing alone will receive approximately \$1.5 million dollars more in tax revenue from our investment in 2017 alone. (See Attachment A)

Additionally, expansion of the lowest cost generation facility Xcel Energy owns¹ will displace energy from higher cost plants, avoid the need to build new plants, and reduce air emissions. Use of the lowest cost resource option

¹ Based on expense per net kWh from FERC Form 1.

minimizes rate impacts for our customers, which in turn will help keep area and regional businesses more competitive. Also, the use of an existing generation facility located on an existing transmission system better utilizes existing assets and eliminates the need for additional investment in new transmission and generation sites. This is not only a cost saving to customers, but a land use benefit to society the power uprate provides over the alternatives. While not all of these socioeconomic benefits are easily quantifiable in dollars or otherwise, all provide significant benefits to the local, state and regional economies.

Lastly, we should also keep in mind that the socioeconomic benefits of the power uprate cannot be achieved without the approval for the Additional Dry Cask Storage Certificate of Need. Thus, when considering the socioeconomic impacts of the power uprate, we should also recognize that there are many benefits including tax revenues, employment opportunities, emission reductions, access to low cost reliable energy, and other socioeconomic impacts that will be realized by the local, state and regional economy from the continued operation of the plant.

Additional Dry Cask Storage Docket (Docket 4220 E002/CN-08-510)

The DEIS indicates that the economic impact of a shutdown of Prairie Island is "...more properly framed as economic impact to citizens of Red Wing, not citizens of Minnesota". While we agree the economic loss to the City of Red Wing would be significant, we disagree that the loss would be localized only to the City. We believe it would have more far reaching implications. The DEIS goes on to indicate that the tax revenues would likely be generated elsewhere in the state. This is only true if the replacement generation were built within the state.

Both the analysis performed by the OES and Xcel Energy identified multiple benefits to the economy and society. These range from highly reliable and low cost energy production that will help businesses in Red Wing, but all Xcel Energy customers regardless of location. Additionally, the benefits of emission free extend far beyond Red Wing City limits.

There are many other economic and societal benefits to the continued operation of Prairie Island. Two of the more significant benefits are the taxes that will result from the continued operation, and the employment benefits that accrue to local and regional economies. Prairie Island currently contributes approximately \$4.5 million a year in property taxes to the City of Red Wing. (See Scenario 2 of Attachment A) If the plant does not continue to operate

past 2013/2014, that tax revenue will drop to an estimated \$82,000 per year by 2016. In comparison, the City would receive an estimated \$6,050,000 in 2016 tax revenue if the plant continues to operate.

The plant currently employs approximately 600 plus people full-time, with approximately 92% living within an approximate 35-mile radius of the plant. This amounts to an estimated Prairie Island payroll of approximately \$47 million within a 30 to 45 minute drive from the plant.

In addition to the plants regular employees, the plant employs an additional 1,300 contractors at the plant throughout a given year. Many of the contractors are local to the area and are used during scheduled outages in various jobs including administrative, plant operations, security, inspections, engineering and management. A review of our purchase orders to contractors in the local area codes the past three years reveals that the plant spends an additional \$3.8 million per year on local merchandise and services.

In addition to the tax, labor, and procurement benefits, there are also many benefits the local and regional civic economies that often go unnoticed or unrecognized. These include the charitable contributions to the local Red Wing economy from the Xcel Energy Foundation, which has averaged \$15,000 per year for the last five years, or the \$82,000 match the Foundation made to the local employees who donated \$82,000 of their salaries to the local Unity Way's in 2008 for a \$168,000 United Way contribution to the region.

As shown, the presence of the plant to the local and regional economies is significant. Xcel Energy contributes significantly to the local tax base and the above average incomes of nuclear employees and contracts with local vendors contribute significantly via the spending power they receive in salary and contracts with the Company. All these issues should be carefully considered when assessing the socioeconomic impact of the plant on the local and regional economies. While the continued operation of the plant may not add significant dollars other than the increased taxes that will be paid, the elimination of the plant will cause a very significant negative impact on the local and regional economies. This could affect the low rates and reliability all Xcel Energy customers now receive and would lead to increased emissions for all of society.

COMMENTS

Our suggestions are grouped by Section as titled in the DEIS. To the extent we did not include a section from the DEIS means we had no comments for consideration in that section.

Summary

Page V, paragraph 5: While the need for additional generation starts in 2010 per the Surplus/Deficit Table (Table 9-1) located on page 9-5 of our Application, the extended power uprate cannot be implemented sooner than the scheduled refueling outages of 2012 and 2015. We recommend modifying the sentence to state “Alternatives were evaluated based on Xcel Energy’s stated resource deficit starting in 2010”.

Chapter 1 – Extended Power Uprate

1.0 Introduction

Page 1, paragraph 2: The filing and acceptance dates should be May 16, 2008 (filing), July 15, 2008 (acceptance), and July 22, 2008 (Order).

Page 1, paragraph 3: The PUC order date should be August 15, 2008.

Page 1, paragraph 3: The correct Docket Number for the Site Permit should be: E002/**GS**-08-690 instead of CN.

1.1 Project Description

Page 1, paragraph 6, line 2: The second sentence should be “The initial licenses will expire in 2013 and 2014 for Unit 1 and Unit 2 respectively.

Page 2, paragraph 6: line 1: Red Wing should be Red Wing

Page 2, paragraph 6, line 2: Section should read Sections

1.1.1 Description of Power Generation...

Page 3, paragraph. 5, line 7: The last sentence should indicate that the spent fuel assemblies are stored in the spent fuel pool to cool for approximately 10-12 years.

1.1.2 Description of Proposed Power ...

Page 4, paragraph 5, line 3: add “the” to “completion of ‘the’ power uprate...”

Page 5, paragraph 3, line 1: delete “require to”

Page 5, paragraph 4: NEED RESPONSE FROM MIKE CARLSON

1.1.4 Fuel Supply

Page 8, paragraph 3, lines 1 & 2: Change “criticality” to “critical”

1.1.5 Water Use

Page 9, paragraph 5, lines 1 & 3: change “of the” to “set by the” after appropriation limits.

Page 10, paragraph 2, line 1: change “for the generating plant” to “from the generating plant”

1.1.6 Wastewater

Page 10, paragraph. 6: line 3: delete “(when daily average upstream river temperatures fall below 43° F for five consecutive days)”

Page 11, paragraph 1, line 1: change “exceed” to “exceeds”

Page 11, paragraph 2, line 1: change “operating procedure” to “operating procedures”

1.1.7 Solid and Hazardous ...

Page 11, paragraph. 4, line 4: delete “does” and change “hold” to “holds”

Page 11, paragraph. 5: drop “s” from “generators”

1.1.9 Operation and Maintenance

Page 11, paragraph 9: Change the first two sentence to read “How the PINGP is operated will not change due to the power uprate. However, the power

update will result in an increase in the cooling needs of the circulating water system.”

Page 12, paragraph 1: Space needed between 2nd & 3rd line to create separate paragraph.

1.2 Purpose and Need

Page 12, paragraph 1, line 3: This section should also reference our March 20, 2009 Supplemental filing. To reflect the Supplemental filing, a period should be added after “...one percent per year” and the last sentence should be changed to read “By 2012, the estimated deficit is 154 MW and by 2022, the deficit grows to over 2,400 MW.”

Also, the OES should consider adding a discussion addressing the need to reduce Greenhouse Gas Emissions per Minn. Stat. 216H.02 subd. 1.

2.1 Certificate of Need

Page 15, paragraph 3, line 3: Capitalize “o” in “order”

Page 15, paragraph 6, line 4: Capitalize E, I and S in “Environmental Impact Statement”

Page 16, paragraph 1, line 1: “Statute” ... Subd. 4 add a ‘s’ to “require”

2.2 Site Permit

Page 17, paragraph 2: “certificate of need” should be “Site Permit” and correct file number should be E002/GS-08-690

Page 17, paragraph 4: Qualify Advisory Task Force (ATF) in this paragraph and delete in subsequent paragraph.

2.3 Nuclear Regulatory Commission

Page 19, paragraph 4: Xcel Energy filed for NRC approval for the use of the larger diameter fuel on June 26, 2008 and we anticipate receiving NRC approval by July 2009.

2.4 Other Permits

Page 20, paragraph 3: “215,000 Million Gallons” should read “235,000 Million Gallons”. Also, the “R” in river should be capitalized

Page 20, paragraph 4, line 2: Change “Nation” to “National” Pollution Discharge Elimination System

Page 21, paragraph 4, line 1: “provide” should be “provides”

Page 21, paragraph 7, line 1: insert “the” between from and DNR

Page 22, paragraph 2, line 5: “F” in federal should be capitalized.

3.0 Project Alternatives

Page 23, paragraph 1, line 5: “Scoping Order” should be capitalized.

3.1 No-Build Alternative

Page 24, paragraph 4, line 5: Change “that this” to “it” and change “2,900 MW” to “over 2,400 MW” to reflect the updated numbers in the Supplemental filing.

3.2 Demand Side Management

Page 24, paragraph 5: Capitalize “Side Management” in line 1; in line 5 add an “s” to “Certificate” for “Certificates of Need”.

Page 24, paragraph. 7: change “1.1 percent” to “1.3 percent” to reflect the Supplemental filing.

Page 25, paragraph 2, line 2: Change “Those impacts” to “The impacts”

Page 25, paragraph 5, line 5: Capitalize “Application”

Page 25, paragraph 6: DSM was previously qualified.

Page 25: Delete the last paragraph, as it does not appear to fit with the discussion.

3.3 Purchase Power: Change “Purchase Power” to “Purchase Power”

Page 26, paragraph 2: Use “PPA” as already qualified.

Page 26, paragraph 3: Hyphen “short-term”

Page 26, paragraph 4, line 5: Delete “s” in “Xcel Energy’s” and add “of” in-between “tons” and “air”

Page 26, paragraph 5: Add hyphen to “short-term” and add word “term” & a hyphen to “long-term.” Also, capitalize “Certificate” and add “of Need” in last sentence.

Page 27, paragraphs. 1-3: Add hyphen to “Long-term” references.

3.4.1 Fossil-Fuel Technologies

Page 30, paragraph 1: End the first sentence after “the appropriate 164 MW scale” and start a new paragraph at the end of the following sentence.

Page 30, paragraph 2: Change “capital cost” to “capital costs” in last sentence.

Page 30, paragraph 4, line 1: Hyphenate “simple-cycle”

Page 30, paragraph 5, line 1: Remove second use of word “alternative” Change “through its screening process” to “through its evaluation process”.

Page 30, paragraph 6: Change “a coal PPA” to “the natural gas CT” and change “519 million” to “433 million” to reflect the Supplemental filing.

3.4.2 Renewable Resource Technologies

Page 34, paragraph 1: Change “was burned “ to “is burned”

Page 34, paragraph 3: Add 2 to “CO₂”

Page 36, paragraph 3; Change “approximately 1,179 million” to “974 million”

Page 36, paragraph 4: “coal PPA” should be “biomass plant”

Page 37, paragraph 5: add “gas” after “firing natural”

3.6 New Transmission

Page 43, paragraph 4, line 1: Change reference to “Monticello” to “Prairie Island”

Page 43, paragraph 4: The in-service date should be 2013 as the 2012 outage is a fall outage.

4.1 Biological Resources

Page 49, paragraph 4: Cottonwood should have (*Populus deltoides*) following it and all the scientific names should be in italics.

4.5 Health and Safety

Page 56: A sentence should be added containing the magnetic field strength at peak flow to give meaning to the percent increase. One recommendation would be “The average magnetic field strength from each of the lines, measured in milliGaus, is 107 mG directly under the power line (based on 2008 peak flow). An estimated 15 percent increase due to the power uprate would result in a reading of 123 mg.

4.6 Land Use

Page 59, paragraph’s 3 & 4: Paragraph 3 references Red Wing’s population of 16,116 in 2000 and paragraph 4 states Red Wing’s population grew to 44,127 in 2000. These are inconsistent.

4.10 Water Resources

Page 67, paragraph 4, line 2: Delete the right parentheses “)” after ice cover.

Page 69, paragraph 4, line 4; Change “us” to Xcel Energy

4.13 Radiological

Page 75, paragraph 3: A report by the National Council on Radiation Protection and Measurements titled “*Ionizing Radiation Exposure of the Population of the United States*” indicates that the Americans’ average total yearly radiation

exposure increased from 360 millirem to 620 millirem per year since the early 1980's due to the greater use of computed tomography and nuclear medicine.

Page 79, paragraph 3: "Samples types" should be changed to "sample types"

Page 83, paragraph 3, line 1: delete "the" before "Xcel Energy"

Chapter 2 – Additional Dry Cask Storage

2.0 Federal Regulation

Page 4, paragraph. 4: The draft SEIS is now scheduled to be release in mid June 2009.

Page 5, paragraph 2: Add a space after "Amendments" in the title

Page 5, paragraph 3: The list of NRC-approved spent fuel storage casks available on their web site corresponds to those that may be used in conjunction with a General storage license. Since the TN-40 cask design is license under the Prairie Island Site specific license, it is not included on the list on the NRC website.

Page 6, paragraph 1: Per the NRC letter Dated October 22 2008, the targeted approval date for the TN-40HT License Amendment Request is now 9/27/2009.

Page 6, paragraph 4: Based on the expected approval date of the TN-40HT storage License Amendment Request, it is not expected that the NRC will approve a TN-40HT Part 71 transportation submittal until 2010.

4.3 Water Resources

Page 19, paragraph 2: Per the SAR Section 10.4, the elevation of the top of the storage pads is 694 ft – 6 inches and not 697 ft.

4.7 Socioeconomic Impacts

Page 21, paragraph. 3: See overall comments at the beginning of this document.

5.3 Radiological Impacts – Potential Incidents and Off-Site Normal ISFSI Operations

Page 28, paragraph 6: Per the SAR Section 10.4, the elevation of the top of the storage pads is 694 ft – 6 inches and not 697 ft.

7.2 Alternative to Continued Operation of Prairie Island

Page 51: Need a blank line between the 5th and 6th paragraphs.

Tables & Figures

Table 5-3 Skyshine Dose Estimates to the Nearest Permanent Residence and Assumptions

In the “SAR” column; the fuel burnup should be “45,000” and the cask loading rate should be “2 casks every year”.

Figure 3.3 Transnuclear TN-40 Dry Storage Cask

The picture is slightly distorted and doesn’t indicate its true dimensions. It should be “stretched out” provide a better visual perspective of the cask diameter to its height. See figure 3-13 of the Certificates of Need for an example.

Copies of these Comments have been served on all parties on the attached service lists.

Please feel free to contact me at (612) 330-5641 with questions regarding any of the above-noted comments. We look forward to working with you throughout the Site Permit and Certificates of Need approval processes for the Prairie Island Nuclear Generating Plant Extended Power Uprate and Dry Cask Storage projects.

SINCERELY,

/s/

Brian R. Zelenak
MANAGER, REGULATORY ADMINISTRATION

Attachments

c: Service Lists

Attachment A
Scenario 1

PROPERTY TAX ANALYSIS
Prairie Island Shutdown in 2013/2014

Pay Year	Goodhue County	City of Red Wing	SD 256	Other	Total
2004	4,043,443	4,515,593	2,110,570	1,089,934	11,759,540
2005	3,702,828	3,968,674	1,840,068	956,222	10,467,792
2006	3,747,250	4,318,291	1,979,347	961,504	11,006,392
2007	3,659,135	4,477,581	2,103,889	981,559	11,222,164
2008	3,486,281	4,466,496	1,940,553	819,164	10,712,494
2009	3,280,000	4,200,000	1,825,000	795,000	10,100,000
2010	2,852,000	3,658,000	1,593,000	683,000	8,786,000
2011	3,033,000	3,888,000	1,691,000	701,000	9,313,000
2012	3,223,000	4,132,000	1,794,000	731,000	9,880,000
2013	3,284,000	4,207,000	1,829,000	724,000	10,044,000
2014	3,411,000	4,371,000	1,899,000	735,000	10,416,000
2015	2,714,000	3,476,000	1,510,000	532,000	8,232,000
2016	66,000	82,000	37,000	15,000	200,000
2017	66,000	82,000	37,000	15,000	200,000
	<u>40,567,937</u>	<u>49,842,635</u>	<u>22,189,427</u>	<u>9,739,383</u>	<u>122,339,382</u>

2004-2008 are actuals.
2009-2017 are estimates.

Assumptions:

- a) the certificate of need in E002/CN-08-510 is denied; and
- b) the application to the U.S. Nuclear Regulatory Commission for renewed operating licenses at Prairie Island is denied.

**PROPERTY TAX ANALYSIS
 Prairie Island Life Extension**

<u>Pay Year</u>	<u>Goodhue County</u>	<u>City of Red Wing</u>	<u>SD 256</u>	<u>Other</u>	<u>Total</u>
2004	4,043,443	4,515,593	2,110,570	1,089,934	11,759,540
2005	3,702,828	3,968,674	1,840,068	956,222	10,467,792
2006	3,747,250	4,318,291	1,979,347	961,504	11,006,392
2007	3,659,135	4,477,581	2,103,889	981,559	11,222,164
2008	3,486,281	4,466,496	1,940,553	819,164	10,712,494
2009	3,280,000	4,200,000	1,825,000	795,000	10,100,000
2010	2,852,000	3,658,000	1,593,000	683,000	8,786,000
2011	3,033,000	3,888,000	1,691,000	701,000	9,313,000
2012	3,223,000	4,132,000	1,794,000	731,000	9,880,000
2013	3,284,000	4,207,000	1,829,000	724,000	10,044,000
2014	3,411,000	4,371,000	1,899,000	735,000	10,416,000
2015	4,523,000	5,793,000	2,516,000	887,000	13,719,000
2016	4,725,000	6,051,000	2,629,000	912,000	14,317,000
2017	5,978,000	7,655,000	3,323,000	1,078,000	18,034,000
	<u>52,947,937</u>	<u>65,701,635</u>	<u>29,073,427</u>	<u>12,054,383</u>	<u>159,777,382</u>

2004-2008 are actuals.
 2009-2017 are estimates.

PROPERTY TAX ANALYSIS
Prairie Island Life Extension with Extended Power Uprate

<u>Pay Year</u>	<u>Goodhue County</u>	<u>City of Red Wing</u>	<u>SD 256</u>	<u>Other</u>	<u>Total</u>
2004	4,043,443	4,515,593	2,110,570	1,089,934	11,759,540
2005	3,702,828	3,968,674	1,840,068	956,222	10,467,792
2006	3,747,250	4,318,291	1,979,347	961,504	11,006,392
2007	3,659,135	4,477,581	2,103,889	981,559	11,222,164
2008	3,486,281	4,466,496	1,940,553	819,164	10,712,494
2009	3,280,000	4,200,000	1,825,000	795,000	10,100,000
2010	2,852,000	3,658,000	1,593,000	683,000	8,786,000
2011	3,033,000	3,888,000	1,691,000	701,000	9,313,000
2012	3,223,000	4,132,000	1,794,000	731,000	9,880,000
2013	3,284,000	4,207,000	1,829,000	724,000	10,044,000
2014	4,125,000	5,286,000	2,297,000	892,000	12,600,000
2015	5,262,000	6,740,000	2,927,000	1,049,000	15,978,000
2016	5,488,000	7,029,000	3,054,000	1,080,000	16,651,000
2017	7,164,000	9,174,000	3,983,000	1,338,000	21,659,000
	<u>56,349,937</u>	<u>70,060,635</u>	<u>30,967,427</u>	<u>12,801,383</u>	<u>170,179,382</u>

2004-2008 are actuals.
 2009-2017 are estimates.

CERTIFICATE OF SERVICE

I, Josie Oxley, hereby certify that I have this day served copies of the foregoing document on the attached list 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 No. E002/CN-08-509

DOCKET No. E002/CN-08-510

DOCKET No. E002/GS-08-690

Dated this 8th day of May 2009

/s/

Josie Oxley
Administrative Assistant

Xcel Energy CON for Prairie Island Nuclear Plant
Extended Power Uprate & Additional Dry Cask
Storage
OAH 7-2500-19797-2
MPUC Dockets: E002/CN-08-509 & CN-08-510,
E002/GS-08-690
4-24-2009 OES

Mike Kaluzniak
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101-2147

Phil Smith
MN DOC - Office of Energy Security
85 - 7th Place East, Ste 500
St. Paul, MN 55101

Craig Affeldt
MN Pollution Control Agency
520 Lafayette Road N – 4th Fl
St Paul, MN 55155

David Ahern
Winthrop & Weinstine
225 South Sixth St, Ste 3500
Minneapolis, MN 55402

Sigurd Anderson
PO Box 30
Frontenac, MN 55086

RaeLynn Asah
350 Hope St
St Paul, MN 55106

Becky Balk
MN Dept of Agriculture
625 N Robert St
St Paul, MN 55155

Patrick & Liz Bearheels
15738 Dakota Circle
Welch, MN 55059

Ronald Benjamin
WI Dept of Natural Resources
3550 Mormon Coulee Rd
LaCrosse, WI 54601

Douglas Benson
MN Department of Health
625 N Robert St
St Paul, MN 55155

Anna Brown
5840 Collischan Rd
Red Wing, MN 55066

Tamara Cameron
US COE – Regulatory Functions Branch
190th Fifth St East
St Paul, MN 55101-1683

Mike Carlson
33388 County 3 Blvd
Red Wing, MN 55066

Jack Carter
13889 – 62nd Avenue North
Maple Grove, MN 55311

Steve Castner
1708 West 5th St
Red Wing, MN 55066

Kevin Church
4869 – 130th Street N
Hugo, MN 55038

Gerald Cook
720 Bluff Street
Red Wing, MN 55066

Jen Cullen
2760 North Service Drive
Red Wing, MN 55066

Jen Cullen
2000 Old West Main St
No. 401
Red Wing, MN 55066

Emily Dalager
400 First Avenue N, Ste 535
Minneapolis, MN 55401

Carol Duff
Red Wing City Council
211 East Avenue
Red Wing, MN 55066

Charlotte Eastin
216 South Prairie
Lake City, MN 55041

Kristen Eide-Tollefson
PO Box 130
Frontenac, MN 55026

Jeff Freeman
DEED
332 Minnesota St, Ste E200
St Paul, MN 55101

Travis Germundson
BWSR
520 Lafayette Road
St Paul, MN 55155

Doreen Hagen
1895 Buffalo Slough Train
Welch, MN 55089

William Hefner
133 First Avenue
Minneapolis, MN 55401

John Howe
2603 Pine Ridge Blvd
Red Wing, MN 55066

John Howie
Box 172
Red Wing, MN 55066

Lance Johnson
38180 County 7 Blvd
Goodhue, MN 55027

Ron Johnson
5636 Sturgeon Lake Road
Welch, MN 55089

Kay Kahlmann
315 West 4th St
Red Wing, MN 55066

John Knapp
Winthrop & Weinstine
225 South Sixth St, Ste 3500
Minneapolis, MN 55402

Stacy Kotch
MN Dept of Transportation
395 John Ireland Blvd
Mailstop 678
St Paul, MN 55155

Allan Kronber
2354 Pineview Court
Red Wing, MN 55066

Glen Kuhl
28626 Hay Creek Trail
Red Wing, MN 55066

Matt Langan
MN Dept of Natural Resources
500 Lafayette Rd
PO Box 10
St Paul, MN 55155

Melissa Lorentz
512 E Mulberry St
Mankato, MN 56001

Paula Maccabee
1961 Selby Avenue
St Paul, MN 55104

Phil Mahowald
Prairie Island Indian Community
Legal Dept
5636 Sturgeon Lake Rd
Welch, MN 55089

Joan Marshman
Florence Township
30129 County 2 Blvd
PO Box 62
Frontenac, MN 55026

Oley Nelson
715 South Oaks Drive
Hastings, MN 55037

Emma Onawa
29050 Levoy Avenue
Frontenac, MN 55026

Art Owen
6392 Sturgeon Road
Welch, MN 55089

Kevin Peterson
Local Union 160
846 – 48th Avenue NW
Rochester, MN 55901

Jennie Ross
MN Dept of Transportation
395 John Ireland Blvd
Mail Stop 620
St Paul, MN 55155

Carol Rust
1826 North Alameda St
Roseville, MN 55113

Arnold Nayer
4810 Lock and Dam Road
Welch, MN 55089

Dr Gio Nguyen
ARDI-STC
212 – 3rd Avenue N, Ste 402
Minneapolis, MN 55401

Carol Overland
PO Box 176
Red Wing, MN 55066

Andru Peters
1009 Safari Way
Lake City, MN 55041

Christian Riech
6037 Candace
Inver Grove Heights, MN 55072

Erin Stojan-Ruccolo
Fresh Energy
408 St Peter St, Ste 220
St Paul, MN 55102

Dick Saunders
PO Box 19118
Minneapolis, MN 55419

Lee Samson
20350 Otero Avenue
Hastings, MN 55033

Michael Schultz
886 Pioneer Road
Red Wing, MN 55066

Sara Singer
718 McSorley St
Red Wing, MN 55066

Alberta Suter
5016 Lock and Dam Road
Welch, MN 55089

Carol Taylor
1936 Edoka St
Welch, MN 55059

Amy Trygestad
Northland Concrete Masonry
12026 Riverwood Drive
Burnsville, MN 55337

Andy Vukmir
1862 Bohmbach
Red Wing, MN 55066

John Wachtler
Barr Engineering
4700 – West 77th St
Minneapolis, MN 55435

Dennis Wells
1895 Buffalo Slough Trail
Welch, MN 55089

Pete Wildonberg
903 Burton
Red Wing, MN 55066

Brian Zelenak
Manager, Regulatory Administration
Xcel Energy
414 Nicollet Mall - 7th Fl
Minneapolis, MN 55401-1993

Cynthia Harrington
Xcel Energy
414 Nicollet Mall - 7th Fl
Minneapolis, MN 55401-1993

SaGonna Thompson
Records Analyst
Xcel Energy
414 Nicollet Mall - 7th Fl
Minneapolis, MN 55401-1993

Xcel Energy CON for Prairie Island Nuclear Plant
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Storage
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4-24-2009 (ALJ)

Burl W. Haar (EF or Orig & 14 copies)
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101-2147

Sharon Ferguson (EF or 4 copies)
Docket Coordinator
Minnesota Office of Energy Security
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

John Lindell
Office of the Attorney General - RUD
900 Bremer Tower
445 Minnesota St
St Paul, MN 55101-2130

Michael Ahern Esq.
Dorsey & Whitney
50 South 6th St, Ste 1500
Minneapolis, MN 55402

Janet Shaddix Elling
Shaddix & Associates
9100 W Bloomington Freeway #122
Bloomington, MN 554431

Arshia Javaharian
Interstate Power & Light
200 First Street SE
PO Box 351
Cedar Rapids, IA 52406-0351

Honorable Richard C Luis (1 paper copy)
Office of Administrative Hearings
PO Box 64620
Saint Paul, MN 55164-0620

Julia Anderson (1 hard copy)
MN Office of the Attorney General
1400 Bremer Tower
445 Minnesota St.
St Paul, MN 55101-2131

David M. Aafedt, Esq.
Winthrop & Weinstine, P.A.
225 South Sixth St, Ste 3500
Minneapolis, MN 55402

B Andrew Brown Esq.
Dorsey & Whitney
50 South 6th St, Ste 1500
Minneapolis, MN 55402

Thomas P Harlan
Madigan, Dahl & Harlan, PA
Campbell Mithun Tower
222 South Ninth St, Ste 3150
Minneapolis, MN 55402

Mike Kaluzniak (1 hard copy)
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101-2147

Robert S Lee Esq.
Mackall, Crouse & Moore
1400 AT&T Tower
901 Marquette Avenue
Minneapolis, MN 55402

Andrew P Moratzka Esq.
Mackall, Crouse & Moore
1400 AT&T Tower
901 Marquette Avenue
Minneapolis, MN 55402

Brian Zelenak
Manager, Regulatory Administration
Xcel Energy
414 Nicollet Mall - 7th Fl
Minneapolis, MN 55401-1993

SaGonna Thompson
Records Analyst
Xcel Energy
414 Nicollet Mall - 7th Fl
Minneapolis, MN 55401-1993

In addition to E-filing or paper service, electronic copies should also be emailed to the following persons:

E-Mail list:

ahern.michael@dorsey.com
apm@mcmlaw.com
becker@mdh-law.com
brown.andrew@dorsey.com
Burl.haar@state.mn.us
calatayud@mdh-law.com
daafedt@winthrop.com
Harlan@mdh-law.com
jshaddix@janetshaddix.com
julia.anderson@state.mn.us
karen.hammel@state.mn.us
Michael.lewis@state.mn.us
mike.kaluzniak@state.mn.us
overland@redwing.net
pat.silberbauer@state.mn.us
Richard.luis@state.mn.us
rsl@mcmlaw.com
sagonna.thompson@xcelenergy.com
Sharon.ferguson@state.mn.us