OAH Docket No. 7-2500-19797-2 MPUC Docket Nos. E-022/CN-08-509 E-002/CN-08-510 E-002/GS-08-690

STATE OF MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS

FOR THE PUBLIC UTILITES COMMISSION

In the Matter of the Association of Northern States Power Company (d/b/a Xcel Energy) for a Certificate of Need for the Prairie Island Nuclear Generating Plant for an Extended Power Uprate

In the Matter of the Association of Northern States Power Company (d/b/a Xcel Energy) for a Certificate of Need for the Prairie Island Nuclear Generating Plan for Additional Dry Cask Storage

In the Matter of the Association of Northern States Power Company (d/b/a Xcel Energy) for an LEPGP Site Permit for the Prairie Island Nuclear Generating Plant (PINGP) Extended Power Uprate Project

PETITION TO INTERVENE ON BEHALF OF THE CITY OF RED WING

Pursuant this Court's First Pre-Hearing Order dated October 3, 2008, Minnesota Statute Section 216.B.243, Minnesota Rules 7829.0800 subpart 6, and Minnesota Rules 1400.6200, the City of Red Wing hereby Petitions to Intervene with full party status in the above entitled matters before the Minnesota Public Utilities Commission.

Red Wing is a city of over 16,000 residents located along the Mississippi River. The Prairie Island Nuclear Generating Plant has been operating within the Red Wing City Limits since 1973. The City of Red Wing provides police, fire and ambulance services to its businesses and residents, including the Prairie Island Nuclear Generating Plant. The Red Wing Fire

Department has agreed to provide certain fire, rescue and other non-fire fighting services in the

Prairie Island Nuclear Generating Plant's emergency zone with the city providing other support

services (police, coordination) as the situation may require.

The City of Red Wing meets the criteria necessary to intervene for several reasons.

Specifically, due to the unique and serious potential risks associated with the Prairie Island

Nuclear Generating Plant that directly affect the residents of the City of Red Wing it is unlikely

that any other party currently participating in the above entitled matter can adequately represent

Red Wing's interest in this matter. Additionally, the proposed Certificate of Need Applications

will have a significant financial impact on the City of Red Wing and accordingly, the factual

record must be established to reflect the true costs and impacts of the proposed Applications for a

Certificate of Need.

This contested case will determine the factual record on which the Minnesota Public

Utilities Commission will base its decision to grant or deny Xcel Energy's application for a

Certificate of Need for an Extended Power Uprate and Certificate of Need for Additional Dry

Cask Storage. Because the outcome of this proceeding will undoubtedly directly affect the

health, safety and welfare of the citizens of Red Wing, the city of Red Wing should be allowed to

participate as a party.

For these reasons, the City of Red Wing respectfully requests to intervene.

MADIGAN, DAHL & HARLAN, P.A.

Dated: March 25, 2009

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