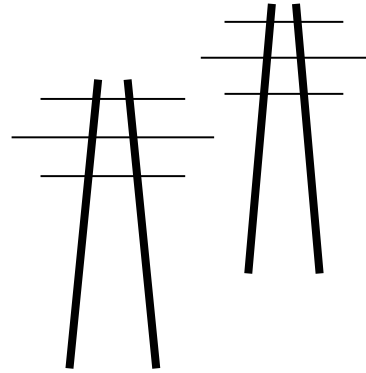


Legalelectric, Inc.

Carol Overland Attorney at Law, MN #254617
Energy Consultant—Transmission, Power Plants, Nuclear Waste
overland@legalelectric.org

1110 West Avenue
Red Wing, Minnesota 55066
612.227.8638



August 14, 2025

Mike Bull
Acting Executive Secretary
Public Utilities Commission
121 – 7th Place East
St. Paul, MN 55101

RE: Comments of Today's Agenda Meeting Discussion **002/CN-24-68**
Status of Transfer or Decommissioning of PINGP Sirens

Dear Mr. Bull:

There was a disturbing discussion during today's meeting during the section about PINGP dry casks. Had I been present, I'd have jumped up and hollered.

Kudos to Chair Sieben for raising the matter of the decommissioning of the sirens for warning of an emergency at PINGP. Her concern is greatly appreciated. As a resident of Red Wing, in section 10SE of the siren map below, I'm extremely concerned about this siren decommissioning and what it means to those of us in the 10 and 50 mile range of PINGP, both about emergency warning and the cost inflicted by Xcel Energy on local governments. Although it's been the news for the last 10 days or so, it's been an issue in the PINGP 10 and 50 mile impact radius for over a year and a half!

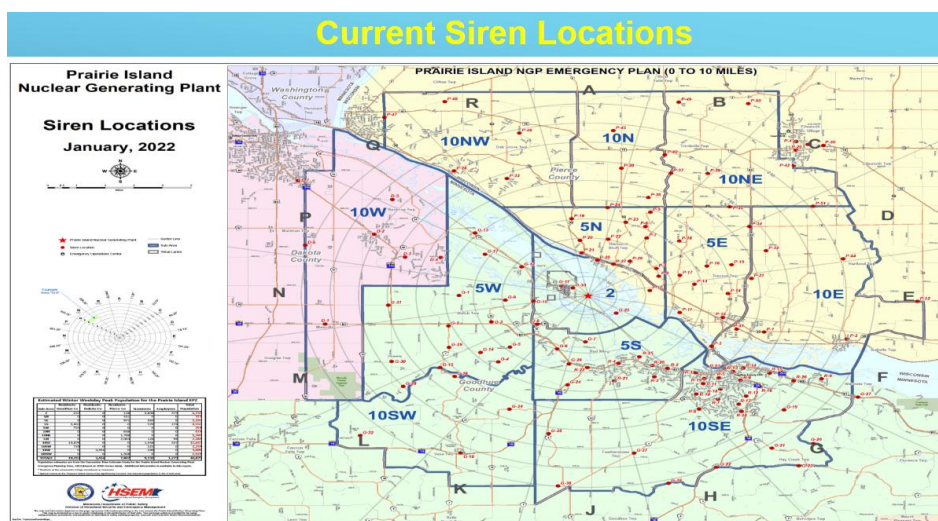
The statements of Pam Gorman Prochaska, Xcel's General Manager, Nuclear Fleet Operations, at today's hearing were not credible. The status of Xcel's transfer of the emergency sirens is public information, for example, sirens were taken on by Red Wing over a year ago. I don't believe that Xcel's General Manager, Nuclear Fleet Operations, doesn't know the status. Did the Commissioners find it odd that there was no disclosure, no answer to Chair Sieben's questioning? We'll see what's revealed in the "Compliance Filing," which should cover sirens in each local government.

Xcel Energy's transfer of sirens to local governments, or if local governments do not agree, to decommission the sirens, is extortion. Local governments have a responsibility to residents to warn of emergencies, but I'd think that a nuclear plant operator would have an even greater

responsibility. For Xcel to say “take these sirens and pay for operations and replacement” or we’ll decommission them doesn’t leave local governments much choice.

Details?

This is a map of the many sirens in the area, with 64 in Goodhue County – how many in Dakota County and Pierce County is not disclosed. Only the 5 and 10 mile areas are shown, and the 50 mile nuclear zone is not. Note that there are several sirens located outside that grey boundary, i.e., at the edge of Hastings, in Ellsworth, WI, in Florence Township, and on the southern border of “10 SE.”



In this area as depicted above, Xcel states there are 40,870 people affected. How many of them have a cell phone on them at all times, with sound on? How many of them are in areas without cell signal – yes, there are areas without signal, or having unreliable cell signal.

Sub-Area	Residents: Goodhue Co	Residents: Dakota Co	Residents: Pierce Co	Transients	Employees	Total Population
2	257	0	358	5,850	474	6,739
5N	0	0	311	0	0	311
5E	0	0	971	364	0	1,335
5S	3,602	0	0	570	378	4,550
5W	754	0	0	0	0	754
10N	0	0	616	0	0	616
10NE	0	0	1,760	0	0	1,760
10E	0	0	2,063	126	54	2,243
10SE	13,870	0	0	1,456	327	15,653
10SW	729	0	0	525	0	1,254
10W	0	3,456	0	240	0	3,696
10NW	0	0	1,928	0	0	1,928
TOTALS	19,212	3,456	2,802	9,131	1,274	40,870

Population estimates are from the Evacuation Time Estimate Study for the Prairie Island Nuclear Generating Plant Emergency Planning Zone, 2012 (based on 2010 Census data). Additional information is available in this report.
 * Students at the community college considered as transients.
 * Special events at the Treasure Island Casino may significantly increase the transient population in the 2-mile area.

The sirens have been an issue for state and local governments since “late 2023” when local governments were notified of siren decommission. It’s been a public issue that I’ve known of since January 2024, when it came before the Red Wing City Council. At that meeting, Xcel’s Emergency Plan was on the agenda¹ and Xcel also made a presentation, Agenda Item 11C, about the 33 sirens and Xcel’s plan to “donate” the 33 sirens to the City (and other local governments).

¹ Despite being on the CONSENT agenda, there was no Emergency Plan in the Council’s packet for review!

The video of the Red Wing Council meeting of January 22, 2024 is online, and I've attached the Council packet. Xcel's presentation begins at 1:07:

<https://redwingmn.portal.civicclerk.com/event/3040/media>

No decision was made at this meeting.

On June 24, 2024, the matter again came before the Council, with Resolution 8014 to accept the "donation" of the 33 sirens. The meeting is online, with Agenda Item 11D beginning at 25:49:

<https://redwingmn.portal.civicclerk.com/event/3045/media> The full packet is attached.

Resolution 8014 was passed unanimously, and the 33 sirens were "donated" with the City of Red Wing taking on responsibility for control and cost of maintenance and replacement.

Note page 16 of 21 of the June 24, 2024 Council packet – it's to be regarded, documented as a "corporate donation." Really... How is Xcel accounting for the transfer of costs? How was the worth determined?



RESPONSIBLE BY NATURE™

CORPORATE CONTRIBUTIONS - INKIND (Non-Cash) DONATION	
XCEL ENERGY INC.	
Corporate Giving 1800 Larimer Street Denver, CO 80202	Corp. Giving Dept CorporateGiving@xcelenergy.com Phone: 612-330-1927
ORIGINAL - Xcel Energy Foundation COPY - Originating Department	

This form is provided to document the donation of in-kind goods and/or services by Xcel Energy to *non-profit organizations. Upon completion, this form must be signed by the recipient and returned to Xcel Energy Foundation Attn: Corporate Giving

And that's not all – it's not just Red Wing. On January 2, 2025, seven months ago, I was present at the Welch Township monthly meeting to introduce myself as the County District 1 representative on the Goodhue County Planning Commission. At that meeting, the Xcel Energy sirens were on the agenda. My notes do not reflect the disposition of this matter, but I think it was referred out for further review.

I'm guessing that by this time, every other local government with sirens within its boundary have been contacted by Xcel Energy and presented with an offer they can't refuse. Let's see what this "Compliance Filing" shows us about the transfer and/or decommissioning status for each of these many sirens.

Again, a big thank you to Chair Sieben for picking up on this issue and trying to get an answer from our recalcitrant friends at Xcel. This issue is important to those of us who depend on sirens for notice of nuclear emergencies. Yes, we needed the bridge built, but we need to hear the sirens to know we should use it.

Very truly yours,

A handwritten signature in cursive script that reads 'Carol A. Overland'.

Carol A. Overland
Attorney at Law