



Marty Kelly
Goodhue County Sheriff

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Red Wing, MN 55066
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To: Honorable County Commissioners

From: Earl Merchlewitz, Goodhue County Emergency Management Director

Re: LOA with Xcel Energy

Date: December 15, 2025

Summary:

As part of our ongoing responsibilities related to emergency preparedness for the Prairie Island Nuclear Generating Plant (PINGP), Goodhue County is required to review annually and updates are approved to the Letter of Agreement (LOA) every three years. This LOA formalizes the roles and responsibilities of Goodhue County, the Sheriff's Office, Public Works, Emergency Management, and our partners in the event of an incident involving the Prairie Island Nuclear Generating Plant.

Attached for your review and reference is the updated LOA. Overall, the agreement remains consistent with prior versions and continues to clearly outline operational responsibilities, coordination expectations, and command structure during emergency events at PINGP.

The primary substantive change in this update pertains to command structure during a Hostile Action-Based (HAB) response. Under the previous LOA, the City of Red Wing was identified as the lead for Emergency Classification Levels (ECLs) of Alert and Site Area Emergency (SAE), with incident command transitioning to the Goodhue County Sheriff's Office once a General Emergency (GE) was declared.

The revised LOA now establishes a unified command between the City of Red Wing and Goodhue County beginning at the Alert level and continuing through SAE and General Emergency declarations. This change ensures continuity of command throughout the escalation of an incident. Importantly, it avoids a transition of command at the General Emergency level—when conditions are most critical and complex—while still preserving the established leadership roles and authorities of all involved agencies.

This unified command approach reflects best practices in incident management, strengthens coordination, and provides a more seamless operational structure during high-risk events. We believe this revision is a positive and necessary improvement that benefits Goodhue County, our municipal partners, and the overall safety and effectiveness of emergency response operations related to PINGP.

OFFICE OF THE GOODHUE COUNTY SHERIFF

ADULT DETENTION
CENTER
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RECORDS DIVISION
651-267-2600

EMERGENCY
MANAGEMENT
651.267.2639

EMERGENCY
COMMUNICATIONS
651.385.3155

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Please feel free to contact me if you have any questions or would like additional discussion regarding the updated LOA. Thank you for your continued support of emergency preparedness efforts in Goodhue County.

Any additional information or questions may be addressed through the Goodhue County Sheriff's Office Emergency Management, Emergency Management Director Earl Merchlewitz at earl.merchlewitz@goodhuecountymn.gov or by phone at 651-267-2639.

Recommendation:

Staff recommends that the Goodhue County Board approve the plan

CC: 1. Public Works Director, Jess Greenwood
2. Sheriff, Marty Kelly

Attachments:

Goodhue County LOA 2025

LETTER OF AGREEMENT BY AND BETWEEN GOODHUE COUNTY, MINNESOTA, THE SHERIFF'S OFFICE OF GOODHUE COUNTY, PUBLIC WORKS DEPARTMENT OF GOODHUE COUNTY, MINNESOTA, THE EMERGENCY MANAGEMENT DIRECTOR OF GOODHUE COUNTY, MINNESOTA, AND NORTHERN STATES POWER COMPANY- MINNESOTA FOR EMERGENCY RESPONSE SERVICES

Pursuant to the terms of this Letter of Agreement ("Agreement"), the County of Goodhue, Minnesota ("Goodhue County"), the Goodhue County Sheriff's Office ("Sheriff"), the Goodhue County Public Works Department ("Public Works Department"), the Goodhue County Emergency Management Director ("EM Director"), and Northern States Power Company- Minnesota ("NSPM"), (together, "Parties," and each a "Party") agree to provide emergency response services to the Prairie Island Nuclear Generating Plant ("PINGP") as follows:

1. The Parties will respond to an incident at PINGP consistent with requirements outlined in Xcel Energy Standard Emergency Plan, Document No EPLAN-01, Rev. 1 (09/02/2025) ("Standard Plan") and the Prairie Island Emergency Plan Annex, Document No. EPLAN-03 Rev. 1 (09/02/2025) ("Prairie Island Plan") (together, "Plans") and any revisions to the Plans, provided that NSPM provides a copy of the revised Plans to Goodhue County, the Sheriff, the Public Works Department, and EM Director, within 30 days of the date of the revised Plans.
2. Each Party has reviewed the Plans and understands its responsibilities pursuant to the Plans. The Parties have equipment, agreements, and procedures to respond to an emergency at PINGP. In the event of an emergency at PINGP, the Parties are prepared to and will respond to a request for assistance as set forth in the Plans.
3. The Parties agree that they will respond to a Hostile Action Based ("HAB") event consistent with the terms of Homeland Security and Emergency Management Prairie Island Nuclear Generating Plant Radiological Emergency Preparedness Hostile Action Based (HAB) Events Plan Supplement adopted by Minnesota Department of Homeland Security Emergency Management ("HSEM").
4. The Parties have mutually adopted and agree to use the Emergency Action Levels as specified in the Prairie Island Plan.

5. In addition to providing emergency response services consistent with the terms of the Plans, Goodhue County agrees to perform the following responsibilities as set forth in the Goodhue County Emergency Response Plan:

- a. Coordination and Control: The Red Wing Police Department ("RWPD") has primary authority in PINGP and shall be the normal single point-of- contact for outside response. The RWPD has the ability to request additional response resources from neighboring agencies (i.e., the primary source of additional resources will be the Goodhue County Sheriff's Office with the ability to request assistance from other neighboring agencies as necessary) to assist them in response to any PINGP contingency situation, including a HAB event. Goodhue County and the Sheriff also have agreements in place to request additional response resources from neighboring agencies, including resources needed to respond to a HAB event.

In the event that NSPM has declared an ALERT as defined in the City/County Plan, a unified command will be established. This unified command will be staffed with a representative from both the City and the County. This will be the practice for both SAE and GENERAL Emergency.

- b. Law Enforcement: The Sheriff, independently and in conjunction with other law enforcement agencies, will provide law enforcement services. The Sheriff will be responsible for initially activating local emergency response personnel, including necessary Sheriff's personnel as well as personnel from other local law enforcement agencies. The Sheriff, in conjunction with other law enforcement agencies, shall provide security, establishing evacuation routes, traffic control, and activation of the Public Alert and Notification Systems, if required. The Sheriff shall call upon mutual aid resources to assist as necessary in response to a HAB or other event.

For a HAB event, the RWPD will set up an Incident Command Post ("ICP") near PINGP. The pre-designated ICP location(s) have been identified; however, selection will depend on the incident. The RWPD maintains the list of potential ICP sites and will be responsible for designating the site during a response and notifying the other agencies responding to the location. Unified command will be established and includes the City of Red Wing, Goodhue and Dakota Counties, state, federal, and utility personnel. Goodhue County will support the ICP.

The Goodhue County Sheriff's Office Tactical Emergency Response Team ("ERT") will be the lead tactical response operations group coordinator and coordinate the tactical response with Command. Sheriff may request tactical team resources as needed from: Minnesota State Patrol Special Response Team, Dakota County ERT, Washington County ERT, and FBI SWAT.

The initial hostile action response goals are:

Maintain vital plant systems to prevent a release of radioactive materials
Protection of on-site workforce
Neutralizing the adversaries and restoring plant operating conditions

Law enforcement tactical operational priorities include:

Securing a perimeter around the site
Immediate containment of vital areas
Sweep and securing of vital areas
Safe movement of critical workers on the site Neutralizing adversaries
Protection/evacuation of the on-site workforce
Sweep of protected area and owner-controlled area

The ICP should be responsible for tracking resources and personnel at or near the site and the City of Red Wing/Goodhue County Emergency Operation Center ("EOC") should be responsible for tracking resources and personnel off-site in accordance with the City & County's Radiological Emergency Plan.

- c. Communication: For a HAB event, communication will be established between the Incident Commander and plant security and operations as soon as possible. The primary, secondary, and tertiary communications links are stated in the draft HSEM PINGP Radiological Emergency Preparedness Hostile Action Based Events Plan Supplement.
- d. Traffic Control: The Sheriff will control traffic out of and into areas affected by the emergency and will coordinate such traffic control with the City of Red Wing to the extent feasible and consistent with the Prairie Island Plan. The Public Works Department will support these efforts.

For a HAB incident, the Sheriff will implement and staff the pre-determined 2-Mile Traffic and Access Control Points ("TACP") to restrict traffic entering the area on local roads as identified in the REP Plans and maps. All law enforcement assigned TACP duties should allow plant employees with proper identification to pass the TACPs to support on-site response activities.

- e. **Public Works Department:** The Public Works Department will assist the Sheriff in any evacuation and will provide roadblock barricades and other necessary equipment to support any evacuation.
 - f. **Public information:** The Chairperson of the County Board, the Emergency Management Director, or the County Administrator or designee, shall be the only public officials authorized to serve as the public information Officer ("PIO") for Goodhue County, unless the emergency is due to criminal activity, in which event the Sheriff may be authorized to act as PIO. Goodhue County may separately appoint a spokesperson to represent Goodhue County at the Joint Information Center.
6. NSPM will respond to an emergency at PINGP as outlined in the Plans. NSPM will support emergency response services provided by Goodhue County, the Sheriff, the Public Works Department, the Emergency Management Director, and all other law enforcement and emergency services providers, including providing training, exercises, and drills. Goodhue County, the Sheriff, the Public Works Department, the Emergency Management Director, and their respective staffs shall participate in the training, exercises and drills provided. The Parties shall ensure that those agencies that may be called upon to assist in response to a HAB event also receive the training, drills, and exercises necessary.
7. NSPM shall ensure prompt access to Goodhue County, the Sheriff, the Public Works Department, and the Emergency Management Director to the PINGP in accordance with plant procedures.
8. Each party shall secure all necessary authorizations to enter into this Agreement prior to executing this Agreement.

9. This Agreement shall become effective on the date of the last signature by the authorized representatives of the Parties. The Agreement may be amended with mutual consent of all Parties. Any Party may withdraw from the Agreement by providing one hundred twenty (120) days' written notice of intent to withdraw from the Agreement to all other parties. The Agreement shall continue in full force and effect for all other Parties that have not submitted a notice of intent to withdraw from the Agreement.

Agree to:

Brad Anderson
Board Chair
Goodhue County
Date

Marty Kelly
Sheriff
Goodhue County
Date

Jess Greenwood
County Engineer/Public Works Director
Goodhue County
Date

Earl Merchlewitz
Emergency Management Director
Goodhue County
Date

Werner Paulhardt
Site Vice President
Prairie Island Nuclear Generating Plant
Date