



June 23, 2023

***Via Federal eRulemaking Portal [regulations.gov]
Via Email [henish.sarah@epa.gov]***

Ms. Sarah Benish
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711

Re: NorthWestern Corporation Comments re: Proposal on National Emissions Standards for Hazardous Air Pollutants: Coal and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review

Docket ID No. EPA-HQ-OAR-2018-0794

Dear Ms. Benish:

On behalf of NorthWestern Corporation d/b/a NorthWestern Energy (“NorthWestern”), I am commenting on the U.S. Environmental Protection Agency’s (“EPA’s”) proposed changes to the National Emissions Standard for Hazardous Air Pollutants (“NESHAP”) for the Coal- and Oil-fired Electric Utility Steam Electric Generating Units (“EGUs”), commonly known as the Mercury and Air Toxics Standard (“MATS”). The proposed changes were published in the *Federal Register* on April 24, 2023, at 88 Fed. Reg. 24,854 (“Proposed Rule”). As discussed herein, the Proposed Rule poses significant challenges for NorthWestern and its rate-paying customers in Montana, will likely have environmental and Environmental Justice impacts that are contrary to Administration policies, and is likely unlawful.

NorthWestern agrees with and incorporates by reference the concurrent comments submitted by Talen Montana, LLC (“Talen”) as part owner and based on its knowledge as operator of Units 3 and 4 of the Colstrip Steam Electric Station (“Colstrip”). NorthWestern. NorthWestern endeavors to minimize duplication of the Talen comments.

These comments are organized into the following sections:

- Summary of Comments;
- NorthWestern’s commitment to environmental and climate responsibility;
- NorthWestern’s commitment to Environmental Justice;
- NorthWestern’s energy portfolio and role in serving Montana electricity customers;