

65. Dramatic repercussions would flow from the loss of North Dakota generation units due to the Final Rule. North Dakota Transmission Authority (NDTA), “Analysis of Proposed EPA MATS Residual Risk and Technology Review and Potential Effects on Grid Reliability in North Dakota” (Apr. 3, 2024) [hereinafter NDTA Analysis], **Attachment F**.

66. The MATS RTR will cause the loss of tax revenue and a decrease in economic activity for the region if units must shut down. Retirements not only economically impact local communities, jobs, and industries, but put more strain on existing resources to provide reliable and affordable energy.

67. The interruption of power delivery from a grid failure would cause damage to public health. North Dakotans rely on electricity to heat their homes during the extreme winter temperatures of the long winter season. Affordable and consistent power allows for medical providers to provide essential services to the elderly, infirm, and to vulnerable individuals with chronic health conditions. Evidence from grid failures in other areas of the country in winter storms Uri and Elliott show the