Early closure would put Montana's electric reliability at risk and could negatively affect Montana's economy.

57. Aside from its role in providing affordable, reliable electricity, Colstrip makes significant economic contributions to the local, county, and state economy.

58. A 2024 study conducted by Dr. Patrick M. Barkey, Ph.D. on the potential economic implications of the MATS Final Rule for Montana's economy (included as Attachment C to this Declaration) found that, if Colstrip were to retire prematurely, in 2028 alone (the first full year of closure for the mine and Colstrip):

a. Montana would have more than 3,000 fewer year-round jobs.

b. Montana households would experience more than $240 million lost income (more than $203 million disposable, after-tax income).

c. Montana would lose over a billion dollars in economic output, generally defined as gross receipts of business and non-business organizations. Of note, this revenue loss is felt by every industry in the economy.

d. Montana would lose more than $102 million in State tax revenue.

59. The study's conclusions are corroborated by other key financial measures which I am familiar with.

60. Colstrip is a large part of Montana's tax base. Colstrip pays approximately $60 million in state, county, and local taxes annually, accounting for 90 percent of municipal and 75 percent of county tax revenue. Colstrip's owners