

An explanation of why the exemption is in the national security interests of the United States is provided below as Item 1. Information regarding technical infeasibility for the PM standard is provided as Item 2. Information regarding technical infeasibility for the Hg standard is provided as Item 3.

1. National Security

GVEA operates and maintains over 3,000 miles of transmission and distribution lines over 5,972 square miles of service territory across Interior Alaska, serving nearly 100,000 residents, three commercial mining operations, and four military installations. One of GVEA's nine electrical generating facilities is the Healy Power Plant, which is the coal-fired power plant subject to the MATS rule. The Healy Power Plant is the only GVEA-owned electrical generating unit that produces commercial levels of electricity year-round using a fuel local to Interior Alaska (coal), which makes the Healy Plant particularly critical to GVEA's grid reliability and independence.

The GVEA system supplies electricity to all four critical military installations in Interior Alaska: US Army Garrison Fort Wainwright, Eielson Air Force Base, US Army Garrison Fort Greely, and Clear Space Force Station. These bases are vital to national security, each serving unique roles.

- Fort Wainwright is home to the U.S. Army's 11th Airborne Division, providing rapid deployment capabilities in the Arctic and Asia-Pacific region.
- Eielson Air Force Base hosts the 354th Fighter Wing, operating F-35 aircraft for air superiority missions.
- Fort Greely, under Missile Defense Command, is integral to the nation's missile defense system with its Ground-Based Midcourse Defense system designed to detect and destroy incoming ballistic missiles.
- Clear Space Force Station operates radar systems to detect incoming intercontinental ballistic missiles and submarine-launched ballistic missiles as well as space surveillance, ensuring early detection and warning of potential threats.

Reliable power supply from GVEA is essential for these installations to maintain continuous operations, directly supporting the defense infrastructure and military readiness of the United States.

Furthermore, GVEA powers pump stations along the critical Trans Alaska Pipeline System. The pipeline delivers oil produced in the Alaskan North Slope oil fields to the fuel refineries in Interior and Southcentral Alaska. Those refineries, in turn, distill the fuel oil that is distributed by truck, rail, barge and air and consumed across Alaska to fuel jets, airplanes, heaters, vehicles, and electrical generation, among countless other fuel demands.

GVEA's grid is practically isolated, having a single transmission line interconnection to electrical utilities serving Alaska's largest population center in Southcentral Alaska, including the Joint Base Elmendorf-Richardson combined U.S. Air Force and Army installation. The Southcentral Alaska electrical utilities depend primarily on natural gas produced from the Cook Inlet to power their grids. Production levels of natural gas in the Cook Inlet have been declining for years and the utilities are now grappling with a severe natural gas shortage. Whereas GVEA has historically been able to purchase excess power from the Southcentral Alaska utilities, that supplemental resource became unavailable as of February 2024 due to the increasingly severe natural gas shortage in the Cook Inlet. As a result, GVEA's generating facilities are becoming increasingly critical to meet electrical needs not only in Interior Alaska, but also to support the utilities and essential operations in Southcentral Alaska.

GVEA's service area and membership are exceptionally vulnerable to disruptions in power generation. GVEA maintains an expansive, practically islanded electrical grid, in an extreme subarctic environment, at an isolated location on the geographical fringe of civilization. GVEA has a strong record of electrical reliability, but the mounting challenges of fuel unavailability, rising costs, and burdensome environmental regulations have undermined GVEA's resilience. A disruption to any one of GVEA's electrical generating facilities can seriously compromise GVEA's ability to meet electrical demands throughout its service territory. GVEA is a vital electrical provider to the military installations in Interior Alaska, and to their regional support networks for personnel, equipment, and supplies, and accordingly, GVEA's reliability is absolutely in the national security interest of the United States. GVEA asks that you recognize this cooperative's essential need for relief from the infeasible emissions limits and unattainable compliance timeframes in MATS by granting a two-year Presidential Exemption from the applicable MATS rule compliance date.

2. Technical Infeasibility for the PM Standard

The 2024 amendments to 40 CFR 63 Subpart UUUU changed the filterable PM standard from 0.030 lb/MMBtu to 0.010 lb/MMBtu, effective on July 6, 2027. The 2024 amendments also changed the compliance demonstration method by