

results in irreversible harm that economically damages Minnkota and impacts the entire region.

69. EPA failed to account for the costs due to a grid failure in the rulemaking. In its service area, Minnkota would anticipate that grid failures would cause end users to suffer economic damages such as food spoilage, property damage, lost labor productivity, and loss of life. The NDTA Analysis discusses these damages in more detail in Section D (Modeling Results).

SUMMARY OF HARM TO MINNKOTA

70. With respect to the New Mercury Limitation, MRY is unable to meet the new limit with its existing technology at full load. Recent test data suggest that Minnkota will not be able to meet the New Mercury Limitation even at the higher PAC injection rates that EPA assumed to be sufficient to meet the New Mercury Limitation. Further testing and analysis would need to be performed to identify MRY's emission reduction rate. If either no feasible technology exists, or if a technology cannot be installed to meet the compliance deadline, the MRY units will be forced to