

undue burden” on the use of coal as “expeditiously as possible” in the interest of national security. See 90 Fed. Reg. at 8353-54 (discussing the Executive Order’s policy goals of “reduc[ing] the global influence of malign and adversarial states,” and “protect[ing] the United States’s economic and national security and military preparedness by ensuring . . . an abundant supply of reliable energy”).

The slew of passages in the Executive Orders make clear: The President has already determined that *any* reduction of regulatory burden when it comes to energy production—including an emergency exemption of the 2024 MATS Rule for any power plant—would be in the national security interest. This is unsurprising. Coal still supplies 16% of America’s electricity. U.S. Energy Information Administration, *What is U.S. electricity generation by energy source?* (Feb. 2024).⁶ This share is especially important because coal provides efficient, low-cost, reliable 24/7 baseload power. In doing so, it stabilizes electrical grids under increasing threats. Moreover, the United States has abundant coal reserves, providing a secure and reliable supply, and generating domestic jobs and economic activity.

The continued operation of Colstrip fits comfortably into President Trump’s directives, as evinced by the Executive Orders discussed. Therefore, specifically exempting Colstrip from the 2024 MATS Rule would be in the national security interests of the United States.

As Talen Montana submitted in its comments to EPA when the 2024 MATS Rule was proposed, “Colstrip is one of Montana’s most important energy assets, especially as demand for reliable baseload power in the western U.S. continues to grow.” Talen Montana Comments 7. Colstrip “is vital to ensuring that Montanans have affordable and reliability electricity, especially during peak winter and summer months.” *Id.*

NorthWestern, the largest public utility in Montana, also extensively commented on Colstrip’s importance to the grid. In the lawsuit challenging the Rule and as part of the request for a judicial stay, NorthWestern submitted a declaration as well (Hines Declaration), included in this recommendation as Exhibit 4. Both these documents flag the importance of Colstrip to the nation’s grid and electricity supply, and how the 2024 MATS Rule hinders national security by disrupting Colstrip’s operations.

- The 2024 MATS Rule will increase electricity rates for Montana ratepayers. Hines Declaration 7-10; NorthWestern Comments 21. In fact, the diversion of funds alone for compliance with the Rule would complicate meeting generation demand. NorthWestern Comments 2-3.
- Replacement electrical generation and transmission capacity does not exist for Colstrip. In other words, Colstrip is truly irreplaceable from an electricity production standpoint, at

⁶ Available at <https://www.eia.gov/tools/faqs/faq.php?id=427&t=3>.