Additionally, there are high costs associated with procuring, installing, certifying, testing, and operating PM CEMS.[22] Assuming that the technology would somehow be feasible to install, Otter Tail and the Co-owners have budgeted $400,000 to install PM CEMS in 2026 at Big Stone. Granting this exemption would avoid these costs if EPA were to reconsider the MATS RTR and provide relief from the PM CEMS requirement.

Finally, PM CEMS must be installed and tested by vendors that are certified, and there are only a limited number of vendors that are available. As two-thirds of coal-fired EGUs have not yet installed PM CEMS, the MATS RTR requirement will overwhelm the current supply of PM CEMS and the availability of vendors to perform the necessary work.[23] For these reasons, and because CEMS technology is unavailable at low PM levels, Big Stone should receive a two-year exemption from compliance with the MATS RTR.

IV. National Security Interests Support an Exemption

Compliance with the requirements in the MATS RTR is not in the national security interest of the nation. President Trump's Executive Order (E.O.) 14156 declares a national energy emergency and confirms that energy generation and grid reliability are issues of national security.[24] The MATS RTR is one of the "policies of the previous administration" that will contribute to the "inadequate and intermittent energy supply" and "increasingly unreliable grid."[25] Similarly, in E.O. 14154, *Unleashing American Energy*, President Trump acknowledged that the past administration's regulations — which include this Rule — have "limited the generation of reliable and affordable electricity" and, in turn, "weaken[ed] our national security."[26] The E.O. calls for the review and potential rescission of rules like this one, which "impose an unburden on the . . . use of domestic energy resources."[27] To ensure "an abundant supply of reliable energy" that will help "protect the United States's economic and national security and military preparedness," the MATS RTR should be subject to exemption.[28]

The Rule's stringent new limits and the high costs associated with compliance, in combination with other prior rulemakings impacting coal-fired EGUs, could force source owners to prematurely retire coal-fired EGUs before there is sufficient new dispatchable generation to replace them, seriously endangering grid reliability. Further, grid reliability is already in jeopardy in South Dakota: The North American Electric Reliability Corporation (NERC) estimates continued future resource adequacy concerns in South Dakota in both the MISO and

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[22] *See* PGEN Comments at 26; *see also* Class of '85 Comments at 18 (estimating $180,000 to $400,000 for "site preparation and engineering analysis, analyzer equipment and installation costs, and initial PS-11 correlation testing").

[23] *See* Class of '85 Comments at 16.

[24] *See* 90 Fed. Reg. 8433, 8433 (Jan. 29, 2025) ("generation capacity of the United States [is] . . . far too inadequate to meet our Nation's needs" and "a reliable, diversified, and affordable supply of energy" is necessary to ensure "military preparedness").

[25] *Id.* at 8433.

[26] 90 Fed. Reg. 8353, 8353 (Jan. 29, 2025).

[27] *Id.* at 8354.

[28] *Id.* at 8353.