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Via email at airaction@epa.gov

March 31, 2025



Honorable Lee M. Zeldin
Office of the Administrator (1101A)
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

RE: Presidential Exemption: *National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review (MATS RTR)*, 89 Fed. 38508 (May 7, 2024): **Big Stone Plant, Near Big Stone City, South Dakota**

Dear Administrator Zeldin:

Otter Tail Power Company (Otter Tail), as operator on behalf of Co-owners of Big Stone Plant (Big Stone)¹, respectfully requests a Presidential Exemption under Section 112(i)(4) of the Clean Air Act from compliance with the revised standards and requirements finalized in the above-referenced MATS RTR rule (MATS RTR or the Rule). Otter Tail² and the Co-owners^{3,4} are seeking a two-year exemption from the current compliance date of July 6, 2027 (as calculated, July 6, 2029) for Big Stone, with the potential for a further extension, as allowed under Section 112(i)(4).

I. Executive Summary

Otter Tail and the Co-owners seek an exemption from compliance with the MATS RTR emissions standards for Big Stone, which combusts subbituminous coal. Otter Tail and the Co-owners seek an exemption for a two-year period from the current compliance date, extending to July 6, 2029. We support this request with information regarding the following:

¹ Otter Tail is a co-owner and the operating agent for Big Stone. The other co-owners are Montana-Dakota Utilities Co. and NorthWestern Energy Public Service Corporation (the Co-owners). Otter Tail makes this request as the operating agent for the Plant and has authority make this request on behalf of the Co-owners.

² Otter Tail is an electric utility that provides generation, transmission, and distribution of electricity and energy services for approximately 133,000 residential, commercial, and industrial customers across 70,000 square miles in Minnesota, North Dakota, and South Dakota.

³ Montana-Dakota Utilities Co. is a subsidiary of MDU Resource Group, Inc. engaged in the distribution of natural gas and the generation, transmission, and distribution of electricity in the states of North Dakota, South Dakota, Montana, and Wyoming. Montana-Dakota provides electric service at retail, serving 145,686 residential, commercial, industrial and municipal customers in 185 communities and adjacent rural areas as of 2024.

⁴ NorthWestern Energy Public Service Corporation, a wholly owned subsidiary of NorthWestern Energy Group, Inc., has provided electricity and / or natural gas to customers in South Dakota and Nebraska since 1923.