

ATTACHMENT B

The following table summarizes how the cost effectiveness of installing a new baghouse at Colstrip was calculated using EPA's post-IRA IPM model. The table was prepared by Trinity Consultants, which Talen Montana retained for the purposes of preparing comments on the Proposed Rule.

Colstrip New Baghouse Cost Effectiveness

Scenario	Unit	Heat Input (MMBtu/yr)	Current FPM Emission Factor (lb/MMBtu)	FPM Emissions (tpy)	% Reduction in FPM without Proposed Rule	New Baghouse Cost (\$/yr)	FPM Emission Factor with New Baghouse (lb/MMBtu)	FPM Emissions with New Baghouse (tpy)	FPM Emissions Reduction from New Baghouse (tpy)	New Baghouse Cost Effectiveness (\$/ton)
EPA Proposed Emission Reductions (Baseload Operation)	3	55,255,556	0.018	497.3		18,992,866	0.0020	54.7	442.6	42,912
	4	55,904,762	0.021	587.0		19,058,306	0.0021	58.7	528.3	36,075
	Total	111,160,317		1084.3		38,051,172		113.4	970.9	39,192
Emission Reductions Using 2040 Base Case	3	42,374,312	0.018	381.4		18,992,866	0.0020	42.0	339.4	55,957
	4	42,925,688	0.021	450.7		19,058,306	0.0021	45.07	405.6	46,982
	Total	85,300,000		832.1	23%	38,051,172		87.0	745.1	51,071
Emission Reductions Using 2050 Base Case	3	6,557,338	0.018	59.0		18,992,866	0.0020	6.5	52.5	361,602
	4	6,642,662	0.021	69.7		19,058,306	0.0021	6.97	62.8	303,606
	Total	13,200,000		128.8	88%	38,051,172		13.5	115.3	330,026

Scenarios. The scenarios presented for calculating the cost effectiveness of installing a baghouse at Colstrip are: (i) based on the utilization and heat input predicted EPA's post-IRA IPM model from present to 2050;⁸⁴ (ii) based on EPA's "baseline" for Colstrip, which represents the 99th percentile of the lowest

⁸⁴ Final Version of the RIA [Regulatory Impact Analysis] for the Proposed EGU MATS RTR, Doc ID: EPA-HQ-OAR-2018-0794-5837; Post-IRA 2022 Reference Case, <https://www.epa.gov/power-sector-modeling/post-ira-2022-reference-case>.