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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): **Coyote Station, Near Beulah, North Dakota**

Dear Administrator Zeldin:

Otter Tail Power Company (Otter Tail), as operator on behalf of the Co-owners of Coyote Station¹, respectfully requests a Presidential Exemption under Section 112(i)(4) of the Clean Air Act (CAA) 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^{3,4,5} are seeking a two-year exemption from the current compliance date of July 6, 2027 (as calculated, July 6, 2029) for the Coyote Station, 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 the Coyote Station, which combusts North Dakota lignite coal. Otter

¹ Otter Tail is a co-owner and the operating agent for Coyote Station. The other co-owners are Montana-Dakota Utilities Co., Northern Municipal Power Agency (for which Minnkota Power Cooperative (Minnkota) is a business agent), and NorthWestern Energy Public Service Corporation (the Co-owners). Otter Tail makes this request as the operating agent for the Station 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 The Northern Municipal Power Agency (NMPA) is a Joint Action Agency serving as the energy supplier for 12 municipal utilities in Minnesota and North Dakota. NMPA is a member of the Minnkota Power Cooperative joint system. Minnkota of Grand Forks, North Dakota, is the operating agent for NMPA. NMPA headquarters is located in Thief River Falls, Minnesota.

⁵ 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.