

to minimize coal-fired power versus those that are not), which further impacts their unique priorities and considerations for deciding whether to install costly controls under the MATS Final Rule.

d. The differing positions among Colstrip's owners are significant, suggesting that compliance with the MATS Final Rule will be extremely contentious absent a stay, while a stay would allow for rational decision-making about Colstrip's future.

e. Absent a stay, installation of new emissions control systems will be extremely expensive—and potentially cost prohibitive—for Colstrip. Such high costs may lead to the premature retirement of Colstrip by the MATS Final Rule's compliance date of July 8, 2027, with a decision to retire made long before litigation over the rule is completed.

f. EPA's GHG Rule, if not overturned, will force closure of Colstrip by the end of 2031, significantly limiting the time to recoup investments to comply with the MATS Final Rule.

g. Absent a stay, it is almost certain that significant time and resources will be dedicated to addressing disputes over the expenditure of funds for compliance with the MATS Final Rule.

h. Absent a stay, compliance efforts with the MATS Final Rule would need to begin essentially immediately—extremely challenging given