

35. A decision to retire Colstrip, especially if forced to be made quickly, will have irreversible impacts to the small community around the plant and the neighboring Rosebud Mine. The mine and the power plant are the only employers of any size within 50 miles and contribute immensely to the local economy and tax revenues.

36. In addition, the Talen Entities would face increased costs related to environmental remediation that is ongoing at Colstrip, pursuant to an Administrative Order on Consent between Talen and the Montana Department of Environmental Quality. The current groundwater remediation system reuses captured water at Units 3 and 4. If the Units are prematurely shut down, additional wastewater treatment systems would be needed, which would increase overall remediation costs by approximately \$2.5 million per year during the period of the premature shutdown.

The Public will Suffer Irreparable Harm if Colstrip is Retired Prematurely

37. Further, Colstrip is vital to ensuring that Montanans have affordable and reliable electricity, especially during peak winter and summer months. Colstrip is one of Montana's most important energy assets, especially as demand for reliable baseload power in the western U.S. continues to grow.

38. The likely end result of the Final Rule on Colstrip is that its owners and operators, including the Talen Entities, will have little choice but to retire the units prematurely. Such decisions will change the makeup of the nation's electricity system and increase risks to electric and transmission system reliability.

39. Risks to electricity system reliability, driven in part by the early retirement of dispatchable, high-capacity factor thermal EGU's such as Colstrip, is a matter of