

least in the near future. Hines Declaration ¶¶ 45–52; NorthWestern Comments 13–16 (“Transmission limitations on the ability to import power”).

- “Colstrip plays a critical voltage-maintenance function.” Hines Declaration ¶ 65. Without Colstrip and its uninterrupted operation, there is a significant blackout risks which would affect businesses and “important infrastructure.” *Id.* ¶¶ 66, 67. This is especially the case because NorthWestern, as a regulated utility, made targeted capital investments improving grid reliability, which had not planned for the 2024 MATS Rule and its costs. NorthWestern Comments 21–22.

The economic consequences of grid disruptions are severe and well-documented, and they pose a national security concern in and of themselves. If Colstrip is forced to reduce or cease operations because it cannot timely comply with the 2024 MATS Rule, there would be an increased risk of the kinds of devastating disruptions that have recently hit California and Texas. Hines Declaration ¶¶ 52, 64–67. All these issues warrant heightened attention when considering military readiness. Colstrip powers the northwestern region generally, including the military bases located in the area. The State of Washington alone is home to nine known military bases. And Oregon, Montana, and Idaho collectively house seven more. Any risk to power disruption in and around these bases affect core national security issues.

External sources confirm Talen Montana and NorthWestern’s grid reliability concerns. The Western Power Pool projects that for July to August, the planning reserve margin falls below 10% for most of 2026 to 2029. The North American Electric Reliability Corporation (NERC) projects that reserve margins reach levels of 10% or below **overall** starting in 2031. NERC, *2024 Long Term Reliability Assessment* 127 (Dec. 2024).⁷

Lastly, Colstrip is also vital to protecting “economic security” as expressed in the two Executive Orders discussed above. *See* 90 Fed. Reg. at 8433; 90 Fed. Reg. at 8353. Colstrip supports more than 3,000 jobs in the local economy, provides \$240.3 million in income for Montana households, and about \$102.8 million in state tax revenue to Montana. Indeed, it has been calculated that Montana benefits in economic activity worth over \$1 billion from Colstrip in the form of electricity costs and reliability, inter-region trade, and lower state government spending. Lebsack Declaration ¶ 58 (including Attachment C);⁸ Talen Montana Comments 6–7.

⁷ Available at [https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC Long%20Term%20Reliability%20Assessment 2024.pdf](https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC%20Long%20Term%20Reliability%20Assessment%202024.pdf).

⁸ The Lebsack Declaration includes an “Attachment C,” which is a study of Colstrip’s economic contributions prepared by Dr. Patrick M. Barkey, Ph.D.