

Activity	Cost	Notes
Total Compliance Cost to MRY	High – \$260,611,500 Low – \$52,251,500	

77. The compliance cost estimates for MRY to comply with the MATS RTR (assuming its possible for the New Mercury Limit), presented in the above Tables A, B, and C, equate to between 15% (low fPM compliance option) to 60% (high fPM compliance option) of Minnkota's total annual operating revenue. Such expenditures will severely and permanently harm Minnkota's membership.

78. Even if the MATS RTR is overturned, the direct costs to Minnkota, its member cooperatives, and end users cannot be recouped once spent. These damages are permanent.

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