

22. The provision allowing for a one-year extension in the compliance deadline where the delay is needed to complete installation of controls and where the company has taken all steps necessary to otherwise meet the deadline does not make a difference. It is equally unrealistic to expect CCS to be constructed and operational at Colstrip by January 1, 2032, as it is unrealistic to expect it by January 1, 2033.

23. For the reasons outlined above, CCS is not an option for Colstrip.

Gas Co-Firing is Not Achievable at Colstrip

24. As an alternative to CCS, the Final Rule allows affected coal-fired EGUs to remain in operation until January 1, 2039, if they begin co-firing with 40% gas by 2030.

25. A project to retrofit Colstrip to co-fire gas would be exceedingly complicated and expensive. According to preliminary evaluations, conversion of Units 3 and 4 to allow for co-firing of gas would cost in excess of \$150 million.

26. In addition to the retrofitting, co-firing gas at Colstrip would require new infrastructure that does not exist. The closest gas transmission pipeline is over 100 miles away. Building such a pipeline would cost on the order of \$200 million or more and is economically infeasible. In addition, there are a multitude of challenges and high-cost items, especially involving the need for easement acquisition and permitting for a pipeline estimated to be over 100 miles long.

27. Putting aside that gas co-firing at Colstrip is so costly that it is economically infeasible (*i.e.*, such a costly project would make the Colstrip plant financially unviable), it is also technically near impossible to execute by 2030. A 100-mile gas pipeline is a massive construction project that requires a long lead time for design,