

## **THE MATS RTR CREATES GRID RELIABILITY CONCERNS DUE TO EARLY RETIREMENTS OF COAL-FIRED UNITS**

59. Lignite coal provides the majority of the electric power generated and consumed in North Dakota. Lignite power plants play a significant role in the regional economy.

60. Thus, this rule, with its reversal of EPA's position on lignite-fired sources, impacts North Dakota more profoundly than other areas of the country. These concentrated impacts affect the ability of the North Dakota utilities to maintain adequate generation resources.

61. Most (if not all) of the lignite plants in North Dakota must make some changes as result of this rule. There will be a marked impact on grid stability and reliability. In addition, increased maintenance needs of new pollution control technology will continue to affect reliability in the longer term.

62. Units will retire due to the inability to meet the New Mercury or fPM Limitations.

63. Existing generation resources are unlikely to be adequate in North Dakota to sustain the grid with multiple unit retirements in a short