

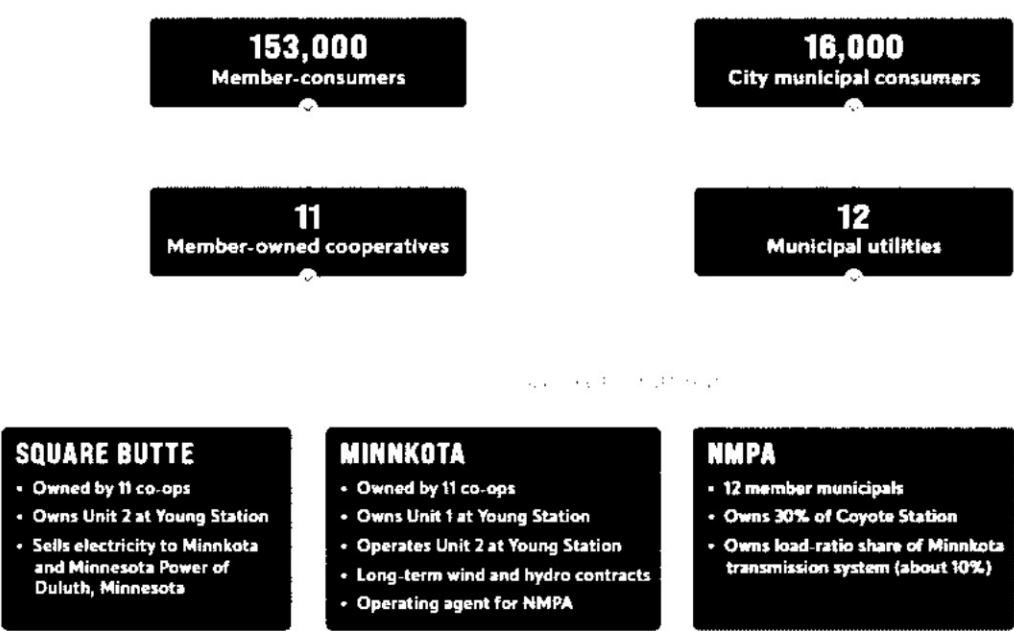
Representative of Milton R. Young Station. Minnkota owns Unit 1 and is the operator for both Units 1 and 2 at Young Station.

I. Introduction.

Minnkota actively participated in the MATS RTR rulemaking process, consistently raising substantial concerns regarding the technological feasibility, compressed time frames, flawed underpinnings, and the resulting impacts on grid reliability and national security. Minnkota respectfully presents the reasons for the President’s consideration that favor him granting a Section 112(i)(4) exemption from compliance with the MATS RTR for the Young Station in North Dakota.

A. About Minnkota Power Cooperative

Minnkota Power Cooperative is a not-for-profit electric generation and transmission cooperative headquartered in Grand Forks, North Dakota. Minnkota provides wholesale electric energy to 11 member-owner distribution cooperatives located in eastern North Dakota and northwestern Minnesota. These member-owner distribution cooperatives serve nearly 153,000 consumer accounts in a 34,000 square-mile area, including many of the region’s homes, farms, schools and businesses. Minnkota has key energy partners in Northern Municipal Power Agency (NMPA) and Square Butte Electric Cooperative that provide strategic collaboration and support. NMPA supplies electric needs of 12 associated municipals that serve more than 16,000 consumer accounts in the same geographic footprint as the Minnkota member-owners. Square Butte owns Unit 2 at the Young Station, a two-unit lignite coal-based power plant located near Center, North Dakota, and is governed by the Minnkota member cooperatives.



Minnkota has a diverse electric generation portfolio that includes coal resources (nameplate 58%), wind (nameplate 33%), hydro (nameplate 7%) and other (nameplate 2%). The Young Station plays a significant role in the generation portfolio as a baseload asset it is the backbone of the joint system. Electricity generated

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