

54. Baghouse installation is extremely costly. It is estimated to cost \$282,715 per fPM ton removed. See **Attachment B**.

55. ESP retrofits are expensive. NRECA's technical consultant estimates \$67,262 per fPM ton removed. See **Attachment B**.

56. Electric cooperatives have limited financial resources to undertake projects of this magnitude in general and especially when coincident with other environmental compliance projects.

57. Minnkota is harmed by having to comply with a New fPM Limitation that may not be achievable prior to the compliance deadline, is based on flawed and unsupported technical conclusions, and is very costly.

58. To comply with the MATS RTR, Minnkota is forced to take measures that immediately increase compliance and operational costs. The MATS RTR impacts Minnkota's ability to supply affordable, reliable energy to its customers. Added costs will place upward pressure on rates for rural customers, particularly when combined with the effects of EPA's other recent electric utility sector-focused rules.