



This timeline is also necessary in NorthWestern's case because of the prejudice NorthWestern has experienced in the development of the Proposed Rule, and the long-lead time needed for closure and planning and construction of replacement baseload capacity. Such a timeline will also maximize the likelihood that replacement capacity will be carbon-free rather than fossil fuel-based. In its deliberations, EPA must consider net environmental and environmental justice consequences over all time scales, rather than only short term objectives. This is both consistent with the law and the objectives of Executive Orders 12898 (as updated) and 13990.

Conclusion

NorthWestern is disappointed that the Proposed Rule in its current form does not achieve its intended objectives, and that NorthWestern was deprived of the opportunity to submit additional useful information by EPA's denial of NorthWestern's extension request. Nevertheless, NorthWestern's strong carbon-free portfolio performance and Net Zero 2050 commitments demonstrate that it shares many of the Administration's long term environmental objectives. NorthWestern is available to further discuss the consequences of the Proposed Rule and potential solutions to the problems it poses. If you have any questions regarding these comments, or would like to further engage on the subject, please contact me at 406-443-7969 or shannon.heim@northwestern.com.

Sincerely,

Shannon M. Heim
Vice President and General Counsel
NorthWestern Energy