

what mercury emission rate the MRY units can achieve. That would require significant additional investment in testing that, along with existing testing costs, will exceed \$600,000.00.

38. To achieve lower mercury emissions, MRY must install and operate advanced pollution control equipment to replace its existing equipment, such as an ACI system with a higher injection rate. Even though the New Mercury Limitation is not shown to be feasible, Minnkota must complete this installation project to improve the emission rate and avoid the only other option of derating the units for compliance. The installation costs and ongoing operation expenses are significant. Specifically, these technologies will require an estimated minimum of \$5,000,000.00 capital expenditure upfront, as well as increased labor costs for installation, operation, and maintenance of the technology, and equipment and associated training, and will result in increased operating costs over the long term. This expenditure must take place expeditiously and certainly before the resolution of this case.