

Cooperative) due to power purchases during Winter Storm Uri from the ERCOT market.

76. The following Tables compile of all of the harms identified herein that Minnkota will suffer due to the Final Rule.

Table A: MRY 1 and 2 Mercury Compliance Costs

Activity	Cost	Notes
MRY Unit 2 Capital Costs:		
Future mercury testing to determine lowest achievable rate	\$600,000	This is a minimum value.
Inlet Hg Monitor	\$150,000	To track coal quality
WFGD Additive Dosing System	\$750,000	To attempt to reduce mercury emissions further
WFGD Oxidizing Reduction Potential (ORP) Monitoring System	\$7,500	For WFGD dosing system feedback
Mercury New PAC Silo and injection equipment capital cost to reach the lowest achievable rate	\$5,000,000	Based on industry data from similar projects; This is the total project cost without financing costs.
MRY Unit 2 Operating & Maintenance (O&M) Costs:		
WFGD Additive costs (based on annual operation)	\$1,412,000	Based on MRY usage rate and supplier pricing
Mercury control additional PAC costs (based on annual operation)	\$1,300,000	Based on EPA hypothetical 5.0 lb/MMacf injection rate for 800 MW unit