

revision to the original MATS Rule promulgated in 2012). I assisted in the development of these comments (“NorthWestern MATS2 Comments”). A copy of the NorthWestern MATS2 Comments is attached as Exhibit A.

5. On August 8, 2023, NorthWestern also provided comments on the New Source Performance Standards for Greenhouse Gas Emissions From New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions From Existing Fossil Fuel-Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule. The proposal was published in the *Federal Register* at 88 Fed. Reg. 33,240 (May 23, 2023). I assisted in the development of these comments (“NorthWestern GHG Rule Comments”). A copy of the NorthWestern GHG Rule Comments is attached as Exhibit B (omitting exhibits that are duplicative of the exhibits to the NorthWestern MATS2 Comments).

6. On December 20, 2023, NorthWestern also provided comments on the Initial Regulatory Flexibility Analysis (“IRFA”) on reliability concerns arising from EPA’s proposed New Source Performance Standards for Greenhouse Gas Emissions From New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions From Existing Fossil Fuel-Fired Electric Generating Units (“EGUs”); and Repeal of the Affordable Clean Energy Rule. The rule proposal was published in the *Federal Register* at 88 Fed. Reg. 33,240 (May 23, 2023) (“Proposed Rule”), and the solicitation for supplemental comments on the IRFA was published in the *Federal Register* at 88 Fed. Reg. 80,662 (Nov. 20, 2023) (“NorthWestern Supplemental Reliability Comments”). I assisted in the development of the NorthWestern Supplemental Reliability Comments, and I also provided a declaration in support of the comments. A copy of the NorthWestern Supplemental Reliability Comments is attached as Exhibit C (again omitting exhibits duplicative of those in Exhibits A and B).