

3. **New/emerging PM monitor technologies and methodologies are being tested in industry.** Assuming the 2024 rule remains in place with the current limits, there are new/novel non-PM CEMs technologies (e.g. metal sorbent traps) that are currently in the evaluation phase. These technologies and options should be allowed to complete evaluation and be given the opportunity to promulgate a new Methodology to accurately measure non-mercury metal emissions. Companies have been working with EPA and the Electric Power Research Institute (EPRI) to prove these technologies to be viable. It is most appropriate to extend the compliance deadline to prove these technologies and give EGUs the option to utilize a more accurate means of demonstrating compliance. Furthermore, these systems are expected to be less expensive and less burdensome for facility compliance.

National security concerns:

Domestic infrastructure, including health care and economic activity, depends on a reliable electric power grid. As a result, electric grid reliability truly is a national security interest. Retirements of dispatchable power plants, including coal plants, in recent years, and replacement with intermittent generation sources, is increasingly straining the reliability of the power grid. In a 2024 fact sheet, the PJM Interconnection, operator of the electric grid for 65 million consumers in 13 states and the District of Columbia, and to which KEY-CON provides power, Stated, “due to the rise in electrification ... and the rapid proliferation of energy-intensive data centers, PJM is now forecasting significant long-term and medium-term load increases – more than 40,000 MW in the next 15 years. At the same time, supply is decreasing. PJM sees significant generator retirements on the horizon due primarily to federal and state policies prompting the shutdown of fossil fuel resources earlier than their useful economic life; PJM expects to lose at least 40,000 MW of generation from retirements by 2030.”²

The 2024 MATS rule may jeopardize Conemaugh’s ability to operate in compliance by imposing incompatible limits and compliance demonstration methods, potentially further challenging grid reliability. Thank you for the opportunity to submit this request. Please do not hesitate to contact me at (724) 357-1713 or gstenger@kepo.com with questions or concerns.

Respectfully submitted,



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² PJM “Fact Sheet for Policy Makers,” 2024