

3. I am providing this Declaration in support of the motions to stay challenging the U.S. Environmental Protection Agency's (EPA) National Emission Standards for Hazardous Air Pollutants: Coal and Oil Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review, 89 Fed. Reg. 38508 (May 7, 2024), known as the Mercury and Air Toxics Standards Risk and Technology Review (the Final Rule or the MATS RTR).

4. Minnkota is a not-for-profit electric generation and transmission cooperative headquartered in Grand Forks, North Dakota. Minnkota provides wholesale electric energy to 11 member-owner distribution cooperatives located in eastern North Dakota and northwestern Minnesota. Minnkota also serves as the operating agent for the Northern Municipal Power Agency (NMPA), headquartered in Thief River Falls, MN.

5. Electricity generated by Minnkota is distributed through the Midcontinent Independent System Operator (MISO) regional transmission organization (RTO). MISO "operates the transmission system and centrally dispatched market" in fifteen states ranging from Canada down to the Gulf