

conditions. Evidence from grid failures in other areas of the country in winter storms Uri and Elliott show the documented health impacts and morbidity caused by those events.³⁷

The potential for unit retirements and strain on North Dakota's portion of the grid profoundly affects the national security. North Dakota has three critical active military installations:

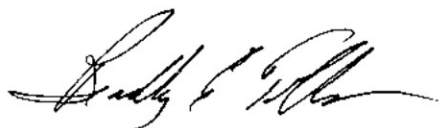
- Camp Grafton (a training site for the North Dakota National Guard, providing instruction for military personnel in engineering, logistics, and maneuver operations);
- Grand Forks Air Force Base (the home to the 319th Air Refueling Wing, which operates KC-135 Stratotankers—providing vital aerial refueling to U.S. and allied aircraft worldwide); and
- Minot Air Force Base (a cornerstone of nuclear deterrence and key location for both strategic bombers and intercontinental ballistic missiles).

It serves the national security interests to ensure that these bases have reliable power delivery. Thus, maintaining the supply of reliable, affordable energy in North Dakota and across the country is vital to national security.

VI. Conclusion

Otter Tail and the Co-owners appreciate the opportunity to present reasons for which the Coyote Station should be exempt from MATS RTR compliance requirements for a two-year period. We respectfully request your consideration and are happy to answer any questions.

Respectfully submitted,



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³⁷ See, e.g., Hanchey, "Mortality Surveillance During Winter Storm Uri, United States 2021," *Disaster Med Public Health Prep* (Dec. 2023), <https://pubmed.ncbi.nlm.nih.gov/37974501/>; Sharma, "Winter Storm Elliott death toll climbs to 56 as thousands still without power in -40 temperatures," *Yahoo News* (Dec. 26, 2022), <https://www.yahoo.com/news/winter-storm-elliott-power-outages-154557710.html>.