71. NorthWestern is seriously examining using a small nuclear facility as a long-term facility to replace Colstrip, but no such facility presently has been constructed or can realistically be constructed and operational prior to the mid-to-late 2030s, at the earliest.

72. For the foregoing reasons, Colstrip's capacity cannot reasonably and timely be replaced prior to the mid-2030's. Closure of Colstrip before then would create significant grid reliability risks in Montana.

EPA's Responses to NorthWestern's Comments on the MATS2 Proposed Rule were incorrect or non-responsive.

73. NorthWestern made all the reliability-oriented points discussed in Paragraphs 23-71 in its NorthWestern MATS2 Comments. EPA very briefly responded to these concerns on pages 52-53 of EPA's "Summary of Responses to Comments and Reponses on Proposed Rule." (EPA-HQ-OAR-2018-0794-6922). The entirety of EPA's response is the following:

> Regarding comments about the impact of closing Colstrip on reliable electrical service, facilities may request an additional time extension through the Department of Energy under the Federal Power Act section 202(c), which are made on a case-by-case basis based on a substantial need for grid reliability. In addition, as other commenters have noted, NorthWestern Energy has recently joined the Western Resource Adequacy Program ("WRAP"), a regional reliability planning and compliance program in the West.

74. Turning first to EPA's observation that NorthWestern has joined WRAP, this is a correct statement, as discussed in detail in NorthWestern's 2023 IRP at Section 3.4. NorthWestern is a founding member of WRAP, and as the IRP states: "One of the program objectives is to leverage the geographic diversity benefits of the larger region to enhance planning and operations during times of peak energy demand. The ability of WRAP participants to pool and share resources during tight operating conditions is expected to lead to increased reliability and potential savings opportunities." A condition of a utility's ability to even participate in WRAP is a portfolio that can already meet WRAP's reliability criteria. WRAP has