reliable generating resource to operate differently at a substantial cost and permanent loss to Minnkota.

75. Minnkota's member cooperatives and end userswill also be economically impacted. If MRY must prematurely retire, Minnkota would not have time to construct replacement generationprior to the compliance date for the Final Rule in 2027. Minnkota would be faced with increased exposure and reliance on an often volatile and constrained MISO market. Past market pricing demonstrates the extraordinary costs to purchase power from the market. The costs of purchasing power off the MISO market may expose Minnkota's membership to a current cap of $3,500 per MWh. A four-day exposure to the MISO market cap (half of the total days of the market conditions resulting from Winter Storm Uri) would result in a total exposure of $236,888,000 to replace the megawatts that MRY 1 and MRY 2 generate (705 MWns cumulatively), thereby eliminating the entire annual operating revenues of MRY. In fact, these staggering costs have bankrupted a small utility recently (Brazos Electric Power