

not keeping up with generator retirements and demand growth. Reserve margins fall below Reference Margin Levels (RML) in winter and summer.”¹⁹ North Dakota’s region of MISO is already in a tenuous, overburdened portion of the grid.

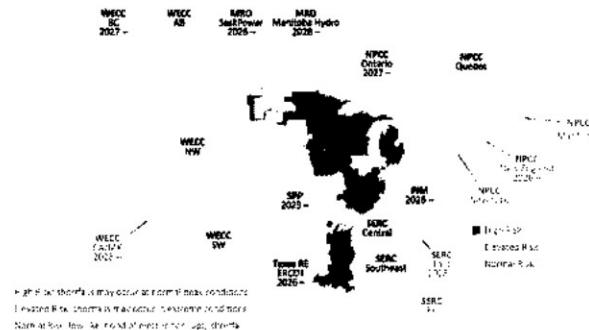


Figure 1: Risk Area Summary 2025–2029

Dramatic repercussions will flow from the loss of North Dakota generation units due to the MATS RTR. This topic was studied during the MATS RTR rulemaking by the North Dakota Transmission Authority (NDTA). NDTA reports a loss of tax revenue and a decrease in economic activity for the region if units must shut down. Retirements not only economically impact local communities, jobs, and industries, but put more strain on existing resources to provide reliable and affordable energy.

The interruption of power delivery from a grid failure will cause damage to public health. North Dakotans rely on electricity to heat their homes during the extreme winter temperatures typical of the long winter season. Affordable and consistent power allows for medical providers to provide essential services to the elderly, infirm, and to vulnerable individuals with chronic health 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.²⁰

Reliable energy is essential to the national defense²¹ in the following ways:

- Power military bases
- Power emergency services to enable quick responses to emergencies, such as acts of war, weather catastrophes, and cybersecurity threats
- Power essential government functions that prevent threats to the country
- Allow fast deployment of military resources
- Power manufacturing facilities that make military weapons, vehicles, vessels, and aircraft infrastructure.

¹⁹ *Id.* at 6.

²⁰ 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>.

²¹ See <https://www.utilitydive.com/news/aging-grid-threatens-national-security-reliability-cyber-threat-transmission/705362/>