

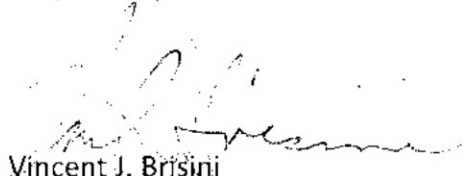
return on investment to accomplish these projects at these facilities. Funding for these projects must be provided from private sources and these additional costs would have to be recovered in the electric markets, which in the case of Pennsylvania is being manipulated by an agreement between the Governor and the PJM Regional Transmission Organization (PJM) to impede the ability for electric generating sources to recover these costs that would be obligated by the revised MATS regulation.

Importantly, President Trump has identified that it is beyond dispute that a reliable and cost-effective electric grid is critical to the national security of the United States. In light of the substantial and unexpected increase in electricity demand growth, keeping the plant online will help to meet this national security objective. However, the issues relating to the ability of merchant generators to recover the costs that would be necessary to continuously achieve the revised FPM limit using the specified FPM CEMS to demonstrate compliance implicates the economic viability of Northampton Generating and other merchant generators in a number of states with restructured electric generation threatening the reliability of various electric grids. In Pennsylvania, by threatening the economics of the coal refuse to energy facilities, the revised MATS rule further threatens the accomplishment of their primary mission which is the removal, remediation and reclamation of highly polluting coal refuse piles; the recovery of mining affected lands; and the improvement of the legacy energy communities of Pennsylvania.

It is also noteworthy that PJM has, itself, highlighted several EPA regulatory processes that it believes have forced the early retirements of electric generating sources and impaired their viability at such an accelerated rate that there may not be adequate generating resources to serve future system demand. System reliability and resilience requirements are only exacerbated by the coming wave of new data centers which have high electricity demands. Regulations such as the new MATS Rule only serve to call the system wide reliability and resilience further into question.

Olympus appreciates the opportunity to make this request for a Presidential two-year exemption from the revised MATS rule FPM emissions standard for Northampton Generating Unit 1. If there are any questions or additional information is required, please contact Vincent Brisini at vbrisini@olympuspower.com or Lauren Quintrell at lquintrell@northgenco.com.

Respectfully submitted,



Vincent J. Brisini
Director of Environmental Affairs

cc: Sean P. Lane, Olympus Power, LLC