

effectiveness would be \$51,071/ton fPM by 2040 assuming 75% of baseload utilization and \$330,026/ton fPM by 2050 assuming 12% of baseload utilization. The post-IRA IPM model predicts an 88% reduction in fPM emissions from Colstrip by 2050, as a result of the IRA *only* and *without* reductions from the Proposed Rule. Thus, by not incorporating the post-IRA IPM model into the analysis, EPA's cost effectiveness estimate for Colstrip is severely underestimated because it is premised on the Colstrip units operating at baseload utilization across a fifteen-year time horizon and fails to account for the change in utilization that Colstrip is projected to undergo by the latter part of that horizon.⁵⁵ In other words, Colstrip is projected to operate and emit less, and thus the same costs will be borne to generate fewer tons of reductions.

Third, EPA fails to account for the reduction in remaining useful life and utilization that also may result from EPA's other rulemakings targeting Colstrip, including the Proposed CCR Rule and the Proposed GHG Rule. For instance, EPA's Proposed GHG Rule, if finalized, would make it challenging for Colstrip to meaningfully operate past 2034, or even 2031, given the proposed 20% capacity factor limit for near-term units in the Proposed GHG Rule (assuming that units would need to adopt that limit from 2031 to 2034). But the Proposed Rule would require the Colstrip owners to spend hundreds of millions of dollars to install FFs or ESPs by 2027 or 2028, only to potentially shut down or seriously curtail operations by 2031 due to the Proposed GHG Rule. In considering the cost effectiveness of the rule, EPA should have considered that the costs to upgrade Colstrip may only be spread over three to four years. This would yield astronomically high annualized costs. Moreover, it is highly improbable that the Colstrip owners would shell out those huge sums of money to operate for three or four more years, as the owners would not be able to recoup those costs. Colstrip shutting down prematurely would have far-reaching ramifications on Montana's economy and the surrounding region and grid stability and transmission, as discussed in Section II.B. — none of which EPA considered.

B. The Cost for Colstrip to Comply with the Proposed 0.010 lb/MMBtu fPM Limit is Exorbitant and Requires Significant Time to Install, Test, and Implement the Controls.

Talen Montana retained Burns and McDonnell ("B&M"), an engineering consulting firm, to evaluate the cost and feasibility of control technologies available to Colstrip to comply with the proposed 0.01 lb/MMBtu fPM limit. Working with equipment vendors, B&M evaluated the cost and feasibility of a number of controls, including an ESP or a FF upstream of Colstrip's existing wet scrubbers, a wet ESP, and an ESP or a FF downstream of Colstrip's existing wet scrubbers. For the purposes of these comments, B&M conducted a high-level feasibility and cost review that would need to be refined with additional engineering. Actual costs when compared to this level of estimate could be as much as 50% higher than those projected here. Sufficient time was not

⁵⁵ See Technical Memo at PDF p. 10.