

GW by 2035. Finally, PJM's reliability study assumes a major contribution from offshore wind projects in New Jersey, an uncertain resource given the public's opposition to these projects.

The Trump Administration recognizes the urgent need for a balanced, reliable, and affordable power grid, as well as the need to rein in regulations that are not needed to protect public health. Granting of an extension for this facility will provide financial relief to allow a full evaluation of the technical and financial feasibility of the benefits and costs of the more restrictive regulations and allow our plant to continue to provide a dispatchable generation resource for the security of the United States and give us, and PJM more time to plan for the continued operation of this critical resource and continue to provide a stable energy supply for the PJM grid. The PJM-RTO is already warning of serious impending Capacity shortfalls (as are other RTOs), and actions like the implementation of MATS RTR will serve to further accelerate the problem. Pervasive capacity shortfalls throughout the United States would have obvious and tremendous national security ramifications.

Granting the requested Presidential Exemptions to SER, and other generators like it, would be in the best national security interests of the United States for a number of reasons, including a secure, reliable power grid, the ability to power the growth of our domestic economy, and unique to our industry, the improvement of land, water, and air while protecting natural resources necessary for sustaining our population. Above and beyond that, our industry is heavily-involved in REE/REM research and analysis with NETL/DOE/Academia. We have worked on a variety of projects exploring the viability of a variety of feedstocks which could all be candidates for decreasing our reliance on foreign-sourced REE/REM.

Therefore, it is in the United States' national security interests to ensure the viability and continuity of base load power generation facilities, like SER, in order to provide reliable and constant power to our industries and communities.

SER appreciates the opportunity to make this request; if there are any questions or additional information required, please contact me at AlBrush@culm2energy.com.

Thank you for your consideration of our request for Presidential Exemption from the MATS Rule.

Sincerely,

Alexander Brush

General Manager