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March 28, 2025

Administrator Lee Zeldin
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Sent via email at airaction@epa.gov

RE: Presidential Exemption: *National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review (MATS RTR)*, 89 Fed. 38508 (May 7, 2024):
Milton R. Young Station, Center, North Dakota

Dear Administrator Zeldin:

Minnkota Power Cooperative, Inc. (Minnkota) respectfully requests a Presidential Exemption under Clean Air Act from compliance with the revised standards and requirements finalized in the above-referenced MATS RTR rule. Minnkota seeks an exemption for a two-year period from the current compliance date of July 6, 2027 (as calculated, July 6, 2029) for the Milton R. Young Station (Young Station) Unit 1 and Unit 2, with the potential for a further extension should the reconsideration of the MATS RTR require EPA additional time.

I. Executive Summary.

Minnkota seeks an exemption from compliance with the MATS RTR emissions standards for the Young Station, Units 1 and 2. Minnkota seeks an exemption for a two-year period from the current compliance date of July 6, 2027. Minnkota supports its request with information regarding the following:

- The mercury technology is not available to implement the emission limitation of 1.2 lb/TBtu at the Young Station. It is entirely uncertain whether this emission limitation can be achieved. Mercury testing results presented in this exemption recommendation letter support this conclusion.
- The filterable particulate matter (fPM) control technology is not available at the Young Station to meet the new fPM limitation. The timelines for control upgrades extend beyond the current compliance dates.
- PM continuous emissions monitors (PM CEMS) are not reliable at low levels of PM, which would be required to accurately measure for compliance. The lack of reliable monitoring further compounds technology availability.

This letter is signed by Robert McLennan, a President and CEO of Minnkota and General Manager of Square Butte Electric Cooperative, and Shannon Mikula, Environmental Manager and Authorized

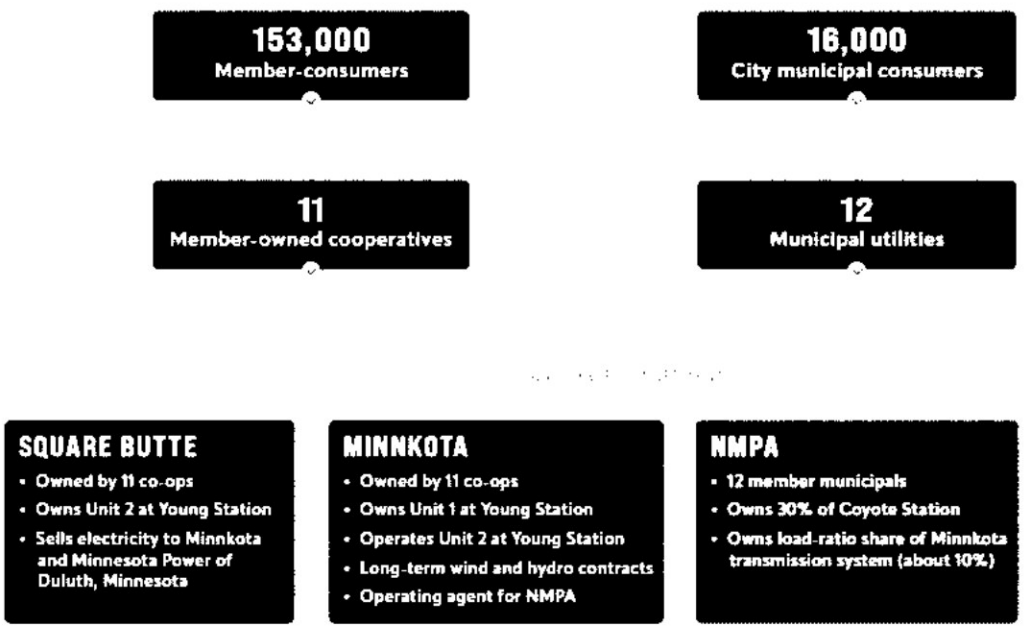
Representative of Milton R. Young Station. Minnkota owns Unit 1 and is the operator for both Units 1 and 2 at Young Station.

I. Introduction.

Minnkota actively participated in the MATS RTR rulemaking process, consistently raising substantial concerns regarding the technological feasibility, compressed time frames, flawed underpinnings, and the resulting impacts on grid reliability and national security. Minnkota respectfully presents the reasons for the President's consideration that favor him granting a Section 112(i)(4) exemption from compliance with the MATS RTR for the Young Station in North Dakota.

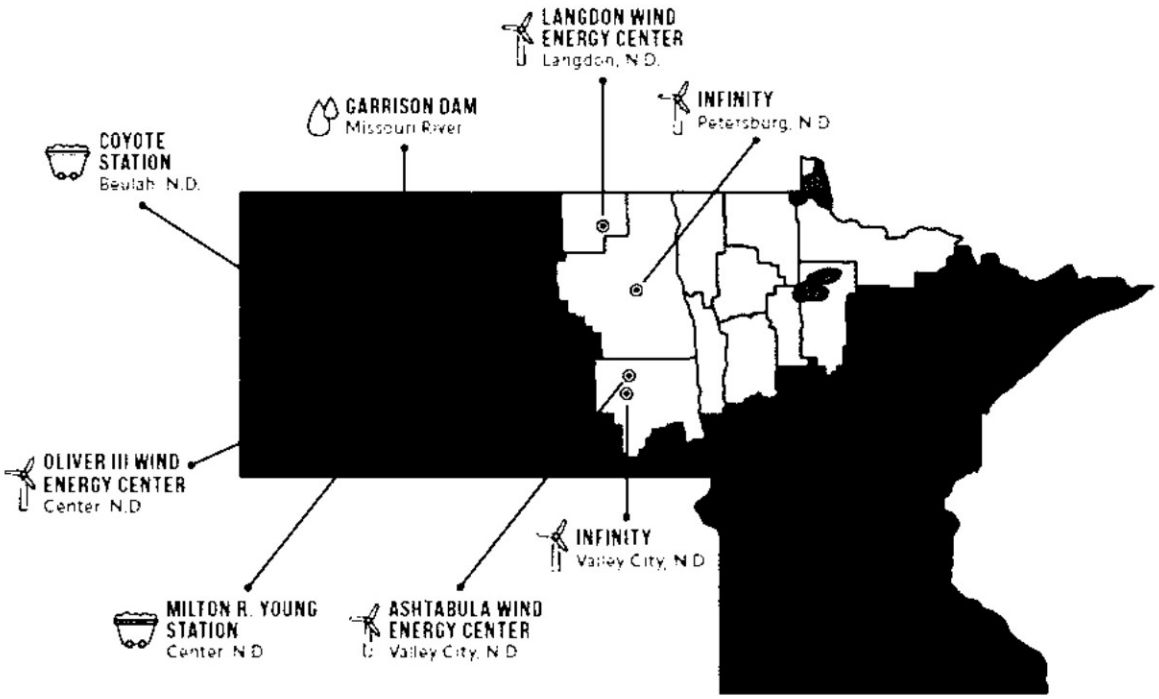
A. About Minnkota Power Cooperative

Minnkota Power Cooperative is a not-for-profit electric generation and transmission cooperative headquartered in Grand Forks, North Dakota. Minnkota provides wholesale electric energy to 11 member-owner distribution cooperatives located in eastern North Dakota and northwestern Minnesota. These member-owner distribution cooperatives serve nearly 153,000 consumer accounts in a 34,000 square-mile area, including many of the region's homes, farms, schools and businesses. Minnkota has key energy partners in Northern Municipal Power Agency (NMPA) and Square Butte Electric Cooperative that provide strategic collaboration and support. NMPA supplies electric needs of 12 associated municipals that serve more than 16,000 consumer accounts in the same geographic footprint as the Minnkota member-owners. Square Butte owns Unit 2 at the Young Station, a two-unit lignite coal-based power plant located near Center, North Dakota, and is governed by the Minnkota member cooperatives.



Minnkota has a diverse electric generation portfolio that includes coal resources (nameplate 58%), wind (nameplate 33%), hydro (nameplate 7%) and other (nameplate 2%). The Young Station plays a significant role in the generation portfolio as a baseload asset it is the backbone of the joint system. Electricity generated

by Minnkota is distributed through the Midcontinent Independent System Operator (MISO) regional transmission organization (RTO). MISO "operates the transmission system and centrally dispatched market" in fifteen states ranging from Canada down to the Gulf Coast. Across those states, it serves more than 42 million customers.[1] Minnkota and its system partners (Northern Municipal Power Agency and Square Butte Cooperative) have the capability of generating 1,425 MWs, which may be provided to MISO for scheduling and reliability purposes. Over half of the electricity generated by Minnkota is dispatchable power from coal sources, meaning it is available on demand, unlike power from wind and solar resources, which do not have on-demand capabilities. Dispatchable power is critical for MISO because MISO has small reserve margins, which is the amount of power needed to ensure demand is met and avoid failure of the grid. The Young Station plays a significant role in the generation portfolio as a baseload asset it is the backbone of the joint system.



Additionally, Minnkota is a member of the Lignite Energy Council (LEC), a regional lignite industry coalition in North Dakota—an $18 billion industry critical to the economy of the Upper Midwest. The members of LEC include mining companies, those that use lignite to generate electricity, synthetic natural gas, and other valuable byproducts, and businesses that provide goods and services to the lignite industry.

B. Milton R. Young Station

Minnkota is the operator and a partial owner of the Young Station, a two-unit, cyclone lignite coal-fired power plant located near the town of Center, North Dakota.

[1] FERC, MISO, https://www.ferc.gov/industries-data/electric/electric-power-markets/miso.

Unit 1 (257 MWg) commenced commercial operation in 1970, and Unit 2 (477 MWg) commenced operation in 1977. Both units employ Babcock and Wilcox cyclone boilers, and both boilers fire North Dakota lignite supplied from BNI Coal, Ltd's Center Mine, located in close proximity to the Young Station.

Each unit is equipped with Advanced Separated Over Fire Air (ASOFA) and Selective Non-Catalytic Reduction (SNCR) for NOx control. Each unit is equipped with Wet Flue Gas Desulfurization (WFGD) for SO2 control. Each unit employs an Electrostatic Precipitator (ESP) for particulate control. Each unit employs halide injection and activated carbon injection for the control of mercury.

Currently, Minnkota uses the same mercury control strategies for both Units and has maintained compliance with the standards. Although Minnkota uses the same control devices for the Units, operation and emissions output differs based on a number of factors. The Units vary in capacity and control device design. Unit 2 has a different ductwork configuration between the air heater and the electrostatic precipitator than Unit 1. Unit 1 has shorter ductwork. Length of ducting effects the amount of residence time for the flue gas to be exposed to powdered activated carbon (PAC), a longer duct provides more time for oxidized mercury to be adsorbed by the PAC, resulting in greater ability to limit mercury emissions.

C. MATS RTR and Presidential Exemption Section 112(i)(4)

1. Clean Air Act 112(d)(6) and revised MATS RTR

EPA promulgated MATS under Clean Air Act (CAA) Section 112 which regulates hazardous air pollutant (HAP) emissions. Congress defines EPA's scope of review for the RTR under the CAA in Sections 112(d)(6) and 112(f)(2). CAA Section 112(d)(6) defines the technology review for air toxics standards such as MATS as follows:

> The Administrator shall review, and revise as necessary (taking into account developments in practices, processes, and control technologies), emission standards promulgated under this section no less often than every 8 years.[2]

CAA Section 112 does not require EPA to recalculate the maximum achievable control technology (MACT) floor from the original standard.[3] The statutory language, "review, and revise as necessary" does not impose that type of analysis.[4] Rather, the review process is more limited and defined by statute as the one-time residual risk review and the octennial technology review. In addition, costs are implied as a component of the RTR analysis.[5]

In addition, Section 112(f)(2) states, in part, "if standards promulgated pursuant to subsection (d) and applicable to a category or subcategory of sources emitting a pollutant (or pollutants) classified as a known, probable or possible human carcinogen do not reduce lifetime excess cancer risks to the individual most

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[2] 42 U.S.C. § 7412(d)(d).
[3] *NRDC v. EPA*, 529 F.3d 1077, 1083 (D.C. 2008) (*NRDC*).
[4] *Id.*
[5] *Association of Battery Recyclers Inc. v. EPA*, 716 F.3d 667, 673 (D.C. Cir. 2013).

exposed to emissions from a source in the category or subcategory to less than one in one million, the Administrator shall promulgate standards under this subsection for such category." Taken together, these two provisions are known as the RTR. EPA released the MATS RTR under the statutory authority of these sections.

EPA originally finalized the RTR for MATS on May 22, 2020 (the 2020 MATS RTR).[6] In that rulemaking, EPA determined that the residual risks from coal-fired and oil-fired EGUs were acceptable and did not identify any new technologies to control HAPs for these units. EPA finalized the RTR without any changes to emissions standards or work practices.

When President Biden took office, he directed EPA to reconsider the 2020 MATS RTR. EPA embarked on a new rulemaking in response, resulting in the MATS RTR. On May 7, 2024, EPA published the final MATS RTR. The MATS RTR lowers the fPM emission standard from 0.030 lb/MMBtu to 0.010 lb/MMBtu. The Rule also tightens the standard for emissions of mercury from lignite-fired EGUs from 4.0 lb/TBtu to 1.2 lb/TBtu. The MATS RTR also requires that existing coal-fired EGUs use PM CEMS to demonstrate compliance with the fPM emission standard, eliminating the stack testing option. The low emitting EGU (LEE) status option for fPM, total non-Hg HAP metals, and individual non-Hg HAP metals for coal-fired and solid-oil derived fuel-fired EGUs has also been removed.

The RTR requires EPA to consider "developments in practices, processes, and control technologies." With respect to fPM, EPA concluded that there are "no new practices, processes, or control technologies for non-Hg HAP."[7] This finding should have signaled the end of EPA's statutory inquiry for fPM. With respect to the mercury standard for lignite coal-fired units, EPA concluded that lignite plants must remove less than 90% of mercury in the flue gas to meet the new limit and are able to achieve this.[8] The MATS RTR reverses course from the 2012 MATS mercury requirements for lignite combusting units. The 2012 rule set an emissions limitation for low rank virgin coal that allows for variations in coal quality. The 2012 MATS mercury emission limitation provides lignite power plants enough leeway to account for high mercury batches of coal, recognizing that mercury emissions are higher from coal with lower heat values.[9]

Minnkota strongly supports EPA's decision to reconsider the MATS RTR for these reasons and others identified in our comments in the MATS RTR docket. There were no developments, so the 2020 MATS RTR analysis should have been affirmed.

2. The Presidential Exemption

CAA 112(i) sets a schedule for compliance. In Section 112(i)(4), Congress provided the President with executive discretion to exempt a stationary source from compliance with standards and limitations provided under Section 112.

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[6] 85 Fed. Reg. 31286 (May 22, 2020).
[7] Proposed Rule at 24868.
[8] 89 Fed. Reg. 38547 (May 7, 2024).
[9] 77 Fed. Reg. 9304, 9388 (Feb. 16, 2012).

> The President may exempt any stationary source from compliance with any standard or limitation under this section for a period of not more than 2 years if the President determines that the technology to implement such standard is not available and that it is in the national security interests of the United States to do so. An exemption under this paragraph may be extended for 1 or more additional periods, each period not to exceed 2 years. The President shall report to Congress with respect to each exemption (or extension thereof) made under this paragraph.

The President's discretion may be exercised upon satisfying a showing that (1) the technology is not available for implementing the standard, and (2) the national security interests of the United States warrant the President's exercise of the discretion.

On March 12, 2025, EPA released a fact sheet[10] regarding the MATS RTR as part of "Powering the Great American Comeback" (the Fact Sheet). The Fact Sheet recognizes the regulatory uncertainty for coal plants, including those in North Dakota. It offers the opportunity for "any source interested in a Presidential exemption, should provide their recommendations to EPA by March 31, 2025." This letter responds to this invitation.

III. Minnkota Requests Presidential Consideration to Exempt the Young Station from Compliance with the Revised MATS RTR Standards.

A. The Technology to Implement the MATS RTR Mercury Standard is Not Available.

The revised MATS RTR mercury standard is not demonstrably achievable. Existing mercury control technology has not been shown to meet the new 1.2 lb/TBtu limit. Minnkota presents the information about lignite as a unique fuel and then presents the reasons why technology to implement the new standards is not available.

Lignite Coal

It is well-known and consistent with Minnkota's experience that lignite deposits vary in quality, including fuel combustion performance and mineral content. Relevant but ignored by EPA in the MATS RTR, mercury content in the lignite varies significantly. This means that different areas within the mine yield lignite in varying quality content (including mercury) on a day-to-day basis. Minnkota is adept at pivoting operations at Units 1 and 2 to accommodate for the changing lignite quality to assure compliance with MATS mercury limitations. However, a compliance margin is critical.

Prior to the revised MATS RTR, the mercury emission limitation provided lignite power plants enough leeway to account for high mercury batches of coal, recognizing that mercury emissions are higher from coal with lower heat values.[11] Further, to address daily and weekly emissions fluctuations, a 30-day rolling averaging period is essential in addition to maintaining a higher mercury emission rate for this subcategory of fuel.

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[10] https://www.epa.gov/system/files/documents/2025-03/fact-sheet-reconsideration-of-mercury-and-air-toxics-standards.pdf

[11] 77 Fed. Reg. 9304, 9388 (Feb. 16, 2012).

Current Technology and the New Mercury Limitation

The MATS RTR mercury limit is technically justified by the conclusion that brominated powdered activated carbon (PAC) improves mercury removal to make compliance available to lignite plants. EPA cited a 2010 trade article to support this proposition in the MATS RTR, which it used in its original MATS analysis.[12] EPA uses the ACI Fuel 2010 Article to support its proposition that a performance standard greater than 90% mercury removal can be achieved by lignite units. The Article presents a chart that compiles mercury removal test results from Department of Energy (DOE) mercury control systems. The scatterplot presents a variety of results under different conditions and equipment configurations. The ACI Fuel 2010 Article dataset contains only one lignite datapoint, which is a unit equipped with a fabric filter. Fabric filters aid in mercury removal because of increasing resonance time and temperature differential. Given the limited dataset, lack of testing data, and lack of ESP-equipped units like the Young Station Units, the ACI Fuel 2010 Article does not support the conclusion that a performance standard of 90% mercury removal can be achieved across the lignite industry, particularly with respect to lignite-fired units that are not equipped with a fabric filter. Minnkota is unaware of any verified testing or evidence that demonstrates that lignite units equipped with ESP can meet the New Mercury Limitation of 1.2 lb/TBtu.

Minnkota also has no existing data or other evidence that the Young Station's mercury control system can achieve 1.2 lb/TBtu simply by adding more PAC. So, Minnkota embarked on a testing project. The Young Station purchased brominated PAC for the purpose of determining if that product could achieve improved mercury removal as compared to non-brominated PAC. Minnkota selected Unit 1 for this trial because its mercury emissions baseline rate was higher than Unit 2. As shown below, the Unit 1 average mercury emissions rate was higher when injecting brominated PAC as compared with non-brominated PAC. This confirms that the technology EPA chose (brominated PAC) was not effective in removing more mercury and thus attaining the emissions standard.[13]

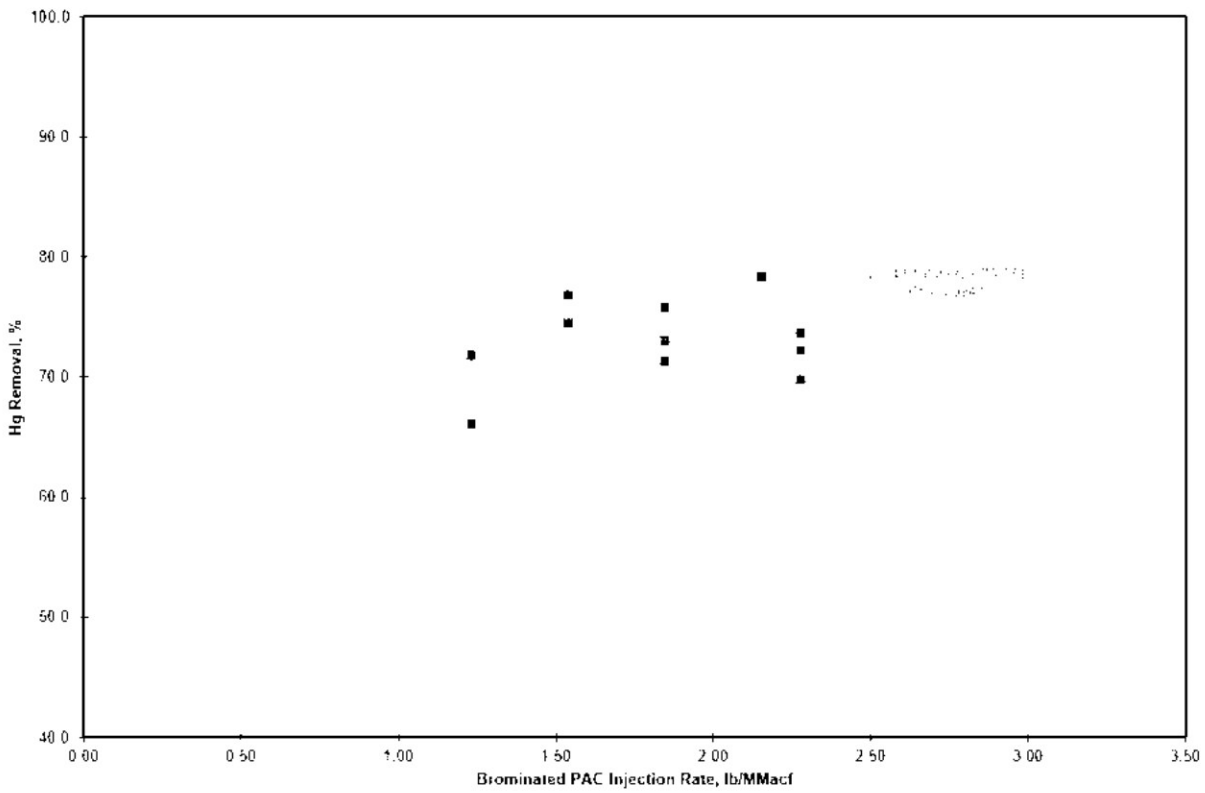
MRY Unit	**Average Hourly Hg Emissions Value Achieved at Full Load (Sorbent Trap) Brominated PAC**	**Average Hourly Hg Emissions Value Achieved at Full Load (Sorbent Trap) Non-Brominated PAC**
Unit 1	2.57	2.17

[12] Sjostrom, "Activated carbon injection for mercury control: Overview," Fuel Vol. 89, Issue 6 at 1320-22 (June 2010) (ACI Fuel 2010 Article). The ACI Fuel 2010 Article was cited in the beyond-the-floor memorandum, Kevin Culligan, SPPD/OAQPS to EPA-HQ-OAR-2009-0234, "Emission Reduction Costs for Beyond-the-floor Mercury Rate for Existing Units Designed to Burn Low Rank Virgin Coal" (Dec. 16, 2011) (Beyond-the-Floor Memorandum), for the proposition that a performance standard greater than 90% mercury removal can be achieved by lignite units.

[13] Minnkota's feasibility testing confirmed that its existing mercury control equipment cannot meet the mercury limit of 1.2 lb/TBtu. Sargent & Lundy, *Mercury Testing Results for the MATS Residual Risk and Technology Review*, at 3-5 (May 22, 2024), Attachment A ("At the current injection capabilities of the existing system (i.e. requiring minimal modifications/retrofit of the existing equipment), BPAC cannot be applied to reduce Hg emissions to 1.2 lb/TBtu.").

Further, Minnkota has no information or data supporting the conclusion that Unit 1 or Unit 2 can achieve the New Mercury Limitation on a 30-day rolling basis while operating at full load. The short-term testing data suggest that even a longer-term averaging period would not result in compliance. The technology that EPA used to set the limitations of the revised MATS RTR cannot feasibly control emissions on Unit 1 and Unit 2 to meet the reduced limit, because the Young Station does not have the technology available for compliance with the revised MATS RTR limitations.

Minnkota further tested Unit 1 by adding more PAC than the Unit's system is capable of injecting by renting portable equipment. However, the results show that even injecting more PAC will not achieve the new mercury limit. The plotted curve shown in the figure shows a leveling off such that increasing the amount of sorbent results in diminishing improvement in Hg control. The projected curve based on the test campaign results shows this leveling off taking place somewhere less than 80% capture." The plotted trend line, based on the test values, is far below EPA's conclusion that injection of brominated PAC at the rate of 3.0 lb/MMacf will result in a 90% removal rate and in line with the ACI Fuel 2010 Article. Consequently, increasing the amount of brominated PAC is not an adequate control strategy to achieve the New Mercury Limitation. The scatterplot from Minnkota's Study is presented below.



Compliance with MATS RTR places Minnkota in an urgent and untenable position, given the impending compliance date. Noncompliance with the Clean Air Act is not an option. Therefore, prior to making a shutdown decision regarding critical assets, Minnkota must undertake more study and testing to determine what mercury emission rate the Young Station units can achieve with the technology available. That would require significant additional investment in testing along with installation of new equipment. We estimate this amount will exceed approximately $600,000.00. Minnkota must also spend money on design and installation

of new mercury technologies if any such feasible technology is identified. We estimate this amount to cost the cooperative a minimum of $5,000,000 in capital expenditures. Minnkota asks for this exemption to avoid these expenditures while EPA reconsiders the MATS RTR.

B. The Technology to Implement the revised MATS RTR Filterable Particulate Matter (fPM) Standard is Not Available by the July 6, 2027 Compliance Date.

1. PM technology improvements are needed and are not available by the compliance date.

Young Station Unit 1 and Unit 2 operate ESPs for fPM control. The Unit controls are unable to consistently perform on a long-term basis to assure compliance with the emissions limit. Minnkota opted to examine the upgrade options in a study focused on Unit 2. A lengthy ESP upgrade may achieve the New fPM limitation with adequate margin. However, this is not certain. Minnkota conducted a MATS 2023 Study that finds that vendors would have to complete a more detailed qualitative study and baseline testing to determine whether an ESP rebuild can achieve a low enough fPM rate based on ESP inlet and outlet emissions. Otherwise, a baghouse would be required. Minnkota would need 48 months (4 years) to convert to baghouse technology.[14] The project dollars to undertake either project are substantial, a range of $246,812,000 to $38,452,000, depending on whether a baghouse is required.[15]

The ESP upgrades could take up to 36 months to complete. With 26 units in the country, all likely needing some form of technology upgrade for the new fPM limitation of 0.010 lb/mmBtu. *Id.* Since there are only 4 vendors in the United States available to modify and license ESP technology, it is likely that the 36-month estimate will be further protracted due to the dearth of contractors available to perform the work.

Therefore, on this basis alone the technology to comply with the new fPM limitation is not presently available at MRY and will not be available by July 6, 2027.

2. Particulate Matter Continuous Emissions Monitoring Systems (PM CEMS) are not technologically able to assure compliance with revised MATS RTR fPM requirements with a sufficient level of accuracy.

The MATS RTR compliance demonstration method requires the use of Particulate Matter Continuous Emissions Monitoring Systems (PM CEMS). While the Young Station has PM CEMS already installed, many units will have additional supply chain constraints for installation. But more importantly, the accuracy of PM CEMS is questionable at best at the emissions levels that must be measured to determine compliance with the lower fPM emissions limit.

A material technological issue is that the commercially available PM CEMS do not provide a direct measure of PM emissions, which means that the instrument measures the mass of PM and the volume of flue gas from which that mass of PM was sampled. Rather, commercially available PM CEMS measure some

[14] S&L, Particulate & Mercury Control Technology Evaluation & Risk Assessment for Proposed MATS Rule, June 23, 2023, Attachment B, at Table 2-2.
[15] McClennan Declaration, Table B.

property (i.e., light scatter or beta attenuation) that must be correlated to actual stack PM measurements.[16] But at lower emissions levels, PM CEMS have not been demonstrated to have the sensitivity needed to accurately account for lower emissions levels. Technological feasibility has not been proven.

In addition, PM CEMS correlation testing will be lengthy and expensive to correlate to the new emissions standard. These monies must be spent prior to the compliance date to ensure the instrument is prepared to serve as the compliance measure by July 2027.[17]

EPA's requirement of PM CEMS measurement in combination with the EPA correlation standard method and the revised MATS RTR fPM limit result in technology that is not available. The technology is not available to demonstrate compliance at the low levels required by the new fPM limit. The technological limitations of PM CEMS to accurately measure fPM at the low levels required by the MATS RTR when required to perform performance correlation standards results in probable failure to obtain meaningful correlations over a limited data range. If a unit fails the correlation test, then its monitoring instrument is out of compliance, and the unit cannot operate with noncompliant monitoring instruments.

B. National Security Interests of the United States Strongly Support Granting the Exemption for the Young Station.

Executive Order 14156 (E.O. 14156) declares a national energy emergency. That E.O. properly ties an affordable supply of energy to the national defense. As to North Dakota, the MATS RTR impacts the state even more profoundly than other areas of the country. Lignite coal powers the majority of the electric power generated and consumed in North Dakota. For this reason, the rule has more intense impacts on North Dakota than other areas of the country. It affects the ability of the North Dakota utilities to maintain adequate generation resources and sustain national security efforts. In turn, the regional economy will be harmed by an unstable grid, affecting countless businesses, families, military operations, and productivity.

The root of the MATS RTR's impacts arise from the changes that most North Dakota lignite plants must undertake to comply with the Rule. Units must retire if they cannot meet the new mercury or fPM limitations that will go into effect in 2027. Multiple environmental regulations that EPA promulgated last year directly and profoundly impact generation resources in North Dakota. The MATS RTR is part of the cumulative reliability and cost impacts on coal-fired generation.

Without adequate generation, the grid is in jeopardy within the region North Dakota is a primary exporter. Multiple unit retirements, without sufficient replacement generation, in a short time frame compound the problem. The North American Electric Reliability Corporation (NERC) estimates continued future shortfalls in North Dakota.[18] NERC reports with respect to the MISO region: "Resource additions are

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[16] The EPA statement at 88 Fed. Reg. at 24,872, that a beta gauge "detector measures the amount of radiation emitted by the sample" is categorically incorrect and illustrative of several uninformed statements (e.g., cost estimates) about PM CEMS in the preamble to the proposed rule.

[17] *See* RLR Consulting, LLC, "Technical Comments on EPA's Proposed Rule: Mercury and Air Toxics Standards Risks and Technology Review – PM CEMS," June 16, 2023 (RLR Report), Attachment C.

[18] NERC, 2024 Long-term Reliability Assessment, Dec. 2024, https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_Long%20Term%20Reliability%20Assessment_2024.pdf

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.

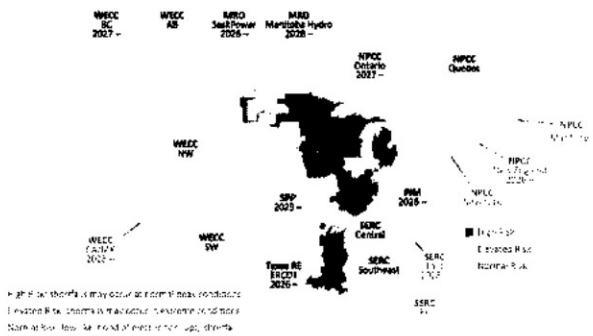

Figure 1: Risk Area Summary 2025–2029

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 defense[21] 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.

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[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-elliot-power-outages-154557710.html.

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

Indeed, the Department of Defense runs global military operations from domestic bases. Operations require a resilient and dependable power supply for mission readiness. Back home, on-base generation and microgrids are necessary to support the thousands of military workers working and living on- and off-base, including the goods and services that support those communities.[22] Power outages destabilize the military defense.

Specifically, North Dakota has three active military installations, critical to the U.S. military mission. North Dakota's military presence is deeply rooted in its strategic location on the Great Plains, making it a key part of national defense since the 1800s. Over the years, the state has hosted numerous forts and installations, supporting military operations ranging from westward expansion to modern nuclear deterrence.[23]

North Dakota's military bases are:

- Camp Grafton-- is a training site for the North Dakota National Guard, providing instruction for military personnel in engineering, logistics, and maneuver operations.
- Grand Forks Air Force Base—is the home to the 319th Air Refueling Wing, which operates KC-135 Stratotankers—providing vital aerial refueling to U.S. and allied aircraft worldwide.
- Minot Air Force Base—is a cornerstone of nuclear deterrence and is a key location for both strategic bombers and intercontinental ballistic missiles.

It serves the national security interests to ensure that these bases have reliable power delivery. Thus, maintaining a healthy grid in ND will ensure that the national security is preserved in Minnkota's service territory.

IV. Conclusion.

Minnkota appreciates the opportunity to present the reasons why the Young Station should be exempt from MATS RTR compliance requirements for a two-year period. We respectfully request your consideration and are happy to answer any questions.

Respectfully submitted,

Robert L. McLennan
President & CEO-*Minnkota Power Cooperative,Inc.*
General Manager-*Square Butte Electric Cooperative*

Shannon R. Mikula
Environmental Manager, Project Counsel-*Designated Representative Milton R. Young Station*

[22] https://acore.org/wp-content/uploads/2021/10/MGI_National_Security_Transmission_Factsheet.pdf
[23] https://www.veteranpcs.com/blog/what-military-bases-are-in-north-dakota