

Burns & McDonnell, *Colstrip Particulate Matter Control Cost Evaluation* Final (Apr. 2024) (select excerpt included as Attachment A to this Declaration). Talen Montana is continuing to work on cost estimates and preliminary engineering on the pollution control equipment necessary to comply with the MATS Final Rule.

Absent a stay, it is almost certain that significant time and resources will be dedicated to addressing disputes over the expenditure of funds for compliance with the MATS Final Rule.

35. It is anticipated that the project to install new baghouses would take 36–42 months (i.e., three years minimum) to complete. Given that timeline, preliminary investigation and engineering work must begin the summer of 2024 (following contracting for such work) with detailed engineering and design in the fall of 2024. If approved, on-site construction work, such as laying foundations, would begin in spring of 2025 but federal permitting hurdles, environmental reviews, and potential challenges (e.g., by environmental organizations) could cause project delays.

36. Work in the balance of 2024 is expected to cost millions, and by the end of the first quarter of 2025, material purchasing will begin and multiple contract awards will ramp up commitments and spending rapidly on a \$350 million project.

37. Given the anticipated timeframe for engineering and construction, even if the project could begin in the fall of 2024, it will be a challenge to complete by the July 8, 2027 compliance deadline, and may still be tight for a compliance even