

III. ANNEX RECOMMENDATIONS

A. Regional Sulfur Dioxide Milestones

1. Year 2000 Goal. The Grand Canyon Visibility Transport Commission Recommendations, dated June, 1996 contained a commitment to achieve a 13% reduction in sulfur dioxide emissions from stationary sources from the 1990 baseline. The Western Regional Air Partnership commits as part of this Annex to compile a regional inventory of sulfur dioxide emissions from stationary sources with actual emissions greater than 100 tons/year of sulfur dioxide. The 2000 inventory will then be compared to the 1990 inventory to ensure that the 13% reduction has been achieved. This regional inventory will be submitted to the Environmental Protection Agency in 2003 as part of Implementation Plans for the States and Tribes that choose to participate in the backstop trading program.

2. Base Milestones. The regional milestones for sulfur dioxide are described in Table 1.

Table 1. Regional Milestones for Sulfur Dioxide (tons SO₂) for All Transport Region States and Tribes

Year	2003	2008	2013	2018
Minimum Milestone (without Suspended Smelters)	682,000	677,000	625,000	480,000
Maximum Milestone (with Suspended Smelters)	720,000	715,000	655,000	510,000

Note: Provisions for defining how the milestones will be adjusted depending on the future operations of two suspended smelters in the region are described below in section 3.a. The Table shows the minimum and maximum milestones that would occur based on the smelter adjustment.

The 2003 milestone will remain constant until it is stepped down in the year 2008, and this same process will be applied for each subsequent 5-year period.

3. Automatic Adjustments. The SO₂ Milestones will be automatically adjusted in the future under the following circumstances:

a. Suspended Smelters.

There are currently two copper smelters in the nine-state Visibility Transport Region that are temporarily suspended due to economic conditions. These smelters are fully permitted, and may resume full operation at any time. EPA policies will determine whether a suspended source resumes operations under its existing permit or alternatively goes through new source review to receive a new permit. If one or both of the smelters resume operation, then the milestones will be adjusted as described below. Once the adjustments have been made, the milestone will not be changed due to future suspensions or changes in plant operations, except as provided below.

(i) If one or both smelters resume operations under their existing permits, the milestone will automatically be adjusted upward for each smelter respectively by the following maximum amounts:

- (A) Phelps Dodge Corporation, Hidalgo Smelter, 22,000 tons SO₂
- (B) BHP, San Manuel Smelter, 16,000 tons SO₂
- (C) For the milestones of 2013 and 2018, the maximum increase will be 30,000 tons.

If either smelter resumes operation in a substantially different manner than historic operations (for example, only operating a portion of the plant), the appropriate permitting authority will scale the emission estimates listed above to reflect current conditions. If the smelter resumes “normal” operations at a later date then the full adjustment described above will be applied.

(ii) If one or both smelters resume operations after going through new source review, the appropriate permitting authority will determine the appropriate SO₂ emission levels for that source. The guidelines established in the model rule for new source allocations will be used to determine the appropriate emission levels. The milestone will automatically be adjusted upward by this amount, but in no instance may the adjustment to the milestones exceed 22,000 tons per year for the Hidalgo Smelter or 16,000 tons per year for the San Manuel Smelter.

(iii) If one or both smelters do not resume operation, each of the remaining existing smelters will be given a facility specific set-aside as described in Table 2 (preliminary numbers). This set-aside will only be available for use if emissions from a remaining copper smelter are above its assumed year 2000 baseline level in any particular year. The actual emissions that are above the assumed baseline level up to the level specified as the set-aside for each smelter will be added to the milestone to account for the increased capacity. The set-aside will not be available for use by other source categories and may not be traded.

Table 2. Preliminary Smelter-Specific Set Aside

Company / Smelter	Baseline Level	Smelter-specific Set-aside
BHP San Manuel	16,000	1,500
Asarco Hayden	23,000	3,000
Phelps Dodge Chino	16,000	3,000
Phelps Dodge Hidalgo	22,000	4,000
Phelps Dodge Miami	8,000	2,000
Kennecott Salt Lake	1,000	100
TOTAL	86,000	13,600

b. State and Tribal Opt in/Opt out. The regional haze rule allows the Transport Region States and Tribes to develop SIPs and TIPS under either section 308 or 309 of the rule. It will not be known until 2003 which States will be part of the program, and Tribes may have a longer time period to develop TIPS (the timing of tribal opt-in is pending legal review by EPA). The milestones have been established assuming that all Transport Region States and Tribes are participating in the program. If one or more Transport Region States or one or more Tribes with eligible sources do not participate, then the regional milestone will be adjusted as follows.

(i) A state or tribal budget under the total regional milestone will be determined as described elsewhere in this Annex. The budgets for all States and Tribes that are participating in the program will be summed to establish the applicable milestone.

(ii) The Tribal Set Aside of 20,000 tons SO₂ as described elsewhere in this Annex will remain constant and will not be affected by this readjustment of the milestone.

(iii) The new source set-aside will be adjusted proportionately to reflect the states and tribes that are participating in the program.

(iv) The suspended smelter provisions described above in paragraph 3.a. will only apply to the extent that the state with jurisdiction over that source participates in the program.

Because the allocation methodology may not be fully consistent with the methodology used to determine the BART level emission reductions, if the allocation methodology is used as the basis for adjusting the milestones in the event that a state opts out of the program, it will be necessary to review the adjusted milestones that are applicable to those states remaining in the program to ensure that the greater reasonable progress than BART requirement is met for those states.

4. Adjustments Due to SIP/TIP Revisions. The SO₂ Milestones will be adjusted in the future

under the following circumstances through the process of State and Tribal Implementation Plan revisions:

- a. Individual Source Opt In.** The WRAP will establish guidelines in consultation with the Environmental Protection Agency for adjusting the milestones to account for non-applicable sources that opt in to the program at a later date.
- b. Changes to emission measurement techniques.** The WRAP will establish a technical review process in consultation with the Environmental Protection Agency to adjust the milestones based on revised measurement techniques and monitoring protocols. The process will be designed to ensure that compliance with the milestones is measured appropriately and is not affected by “paper” emission reductions or emission increases.
- c. Changes due to periodic reviews and audits.** The states and tribes will conduct periodic reviews and audits to evaluate program performance. Any changes identified through this process will be incorporated into SIP/TIP revisions.
- d. Illegal emissions limits.** If it is determined that the milestones were based on illegal emissions, an appropriate adjustment will be made. The specific mechanism for this adjustment needs further discussion by the WRAP.

5. Utility CEMS Adjustment Protocol for Interim Milestones.

As currently crafted the WRAP interim milestones are based on utility emissions projections from 1999 as measured by the current CEMS test method. (Test Method 2). EPA has established several alternative test methods that will be available to utilities on a going-forward basis. These new emission measurement techniques are expected to lower emission level readings from utilities. To account for these changes in utility CEMS emission measurement techniques, the WRAP, working with EPA, will develop a protocol by the end of 2000 to adjust the interim milestones as necessary. This protocol will be submitted to EPA for approval as part of the changes to section 309 that incorporate the Annex.

The protocol must be designed to ensure that utility sources using new CEMS measurement techniques are identified through reporting requirements, and to ensure that the interim milestones are consistent with the new measurement techniques so that compliance is not affected by "paper" emission reductions or emissions increases. The WRAP's goal is to design the protocol in such a way that milestones can be adjusted without the need for SIP revisions. The actual magnitude of the adjustments will be determined using a facility specific analysis of those facilities that actually adopt the new measurement methodologies. The CEMS measurement issue has already been addressed in the 2018 milestone and that milestone will not be affected by this protocol.

6. Compliance. Compliance with the milestones will be measured according to the following process:

a. Annual SO₂ Emissions Inventory. The participating Transport Region States and Tribes will compile a regional SO₂ emissions inventory of all stationary sources with actual emissions greater than 100 tons/year SO₂ on an annual basis, beginning with the year 2003 inventory. Applicable sources that reduce emissions below the 100 tons/year cutoff for SO₂ will continue to be included in the inventory in future years.

b. Averaging. The participating Transport Region States and Tribes will compare the three-year average emission inventory to the comparable three-year average milestones. Because this program does not begin until 2003, compliance in 2003 will be based on 2003 data only. Compliance in 2004 will be based on an average of 2003 and 2004 data. Compliance using a three-year rolling average will begin with the 2003-05 data. If the emission inventory average exceeds the milestone average, then the backstop trading program will be triggered.

c. Special Provisions for the year 2018. The participating Transport Region States and Tribes will compare the year 2018 SO₂ emissions inventory to the year 2018. If emissions in 2018 are greater than the 2018 milestone then the program will be triggered. In addition, penalties will be imposed as follows:

(i) each source's emissions would be reconciled with each source's allowance allocations under the trading program for the year 2018.

(ii) After a brief reconciliation period during which sources would be allowed to trade allowances with one another, any source found to have emissions in excess of its allowances would face both a 2:1 allowance offset and monetary penalties of \$5,000 per ton of excess SO₂ emissions in 2000 dollars indexed to inflation.

d. Special Provisions for Mohave Emissions for 2003-2006. When the interim milestones were first recommended by the WRAP's IOC, there was an undiscovered error in the baseline emissions projection for utilities. The error was that controls planned for the Mohave Electric Generating Station in 2006 were incorrectly assumed to be in place in 2003. Therefore, the WRAP has included a correction for this error that will be used when measuring compliance with the milestones for 2003 through 2006.

Consistent with the recommendations of the GCVTC, for the purposes of evaluating compliance with the interim milestones, prior to installation of the SO₂ controls required by the end of 2006 in the Consent Decree for Grand Canyon Trust v. Southern California Edison (District of Nevada CV-S-98-00305-LDG, dated December 15, 1999), emissions from the Mohave Generating Station will be calculated using an SO₂ emission rate of 0.15 pound per million BTU of coal input. This emission rate is consistent with the maximum allowable emission rate effective in 2006 under the Consent Decree. These calculated emissions for Mohave will be substituted for the actual emissions in 2003, 2004, 2005, and on a prorated basis for 2006 (i.e., for any part of 2006 prior to the installation of the controls) for the purpose of determining

compliance with the interim milestones.

7. 2013 SIP review: The program will include five year State Implementation Plan (SIP) reviews, with an option for a 2013 trigger of the program. The purpose of the optional trigger is to insure that regardless of whether the milestone is met in 2013, the targeted emission reductions actually occur by the 2018 milestone date, as agreed to in this program and as required by the regional haze regulations. This 2013 trigger option will be implemented by consensus of those states and tribes that have implementation plans under Section 309. Implementation of the early trigger will be based on a demonstration that available data indicates compliance with the 2018 milestone will not be achieved. Data used to make this forecast includes projected or actual emission levels for 2013, and projected remaining emission reductions available in the region through 2018. Even so, there are provisions for individual source penalties if the 2018 milestone is eventually exceeded.

B. Best Available Retrofit Technology and Geographic Enhancements

1. Greater Reasonable Progress than BART. The supporting documentation that is submitted with the Annex demonstrates that the regional milestones provide greater reasonable progress than BART, and therefore meet the RH rule requirement to address BART for regional haze.

2. Reasonably Attributable BART. EPA has indicated that all BART for the region does not expire until the milestone reflecting greater reasonable progress than BART has been achieved. In the interim, it is therefore necessary to reconcile the use of BART for regional haze and reasonably attributable visibility impairment.

There are three steps to the process of determining reasonable attribution and BART under the visibility protection program. The Federal Land Manager must certify to the State or Tribe that impairment exists. The State must then determine attribution for a specific BART-eligible source or group of sources. Finally, appropriate emission controls would be established for the source after considering the statutory factors of cost of compliance, the energy and non-air environmental impacts of compliance, any existing pollution control technology in use at the source, the remaining useful life of the source, and the degree of improvement in visibility that may reasonable be anticipated to result from the use of such technology. The participating Transport Region States and Tribes and the Federal Land Managers intend to submit a Memorandum of Understanding as part of their the State and Tribal Implementation Plans in 2003 that outlines the principles that will be followed for addressing reasonably attributable BART within the context of regional SO₂ milestones and a backstop emission trading program that have been developed to address regional haze (a draft MOU is provided as part of the supporting documentation for the Annex).

a. FLM Certification.

The Federal Land Managers have a statutory obligation to protect the National Parks and

Wilderness Areas that have been designated as mandatory federal Class I areas. The MOU cannot restrict the authority of the Federal Land Managers to fulfill this obligation. In the course of certifying impairment, the FLMs may make recommendations to the states regarding a source or sources to which impairment may be reasonably attributable. Within the context of established regional milestones for SO₂ and a backstop trading program, the Federal Land Managers have said they believe that it is appropriate to use the following screening process in making these recommendations as part of the certification process.

- (i) Sulfate levels in the Class I area are not decreasing.
- (ii) One or more BART-eligible sources for SO₂ are located within 100 miles of the mandatory federal Class I area.
- (iii) The BART-eligible sources identified in (ii) are not already well-controlled for SO₂ (85% control for coal-fired utility boilers, the level for other sources will be determined at a later date)

The FLMs are in the process of expanding the IMPROVE monitoring network throughout the west. The FLMs will establish a goal to complete their certification process by the year 2006, after consultation with the states, for Class I areas within the Visibility Transport Region to provide greater certainty for the potentially affected sources in the region. This goal will not in any way restrict the ability of the Federal Land Managers to certify impairment at a later date if it is necessary to fulfill their statutory obligations.

b. State or Tribal Determination of Attribution.

The Transport Region States and Tribes have a statutory obligation to respond to certifications of visibility impairment by the Federal Land Managers. The MOU cannot restrict the authority of the Transport Region States and Tribes to fulfill this obligation. Within the context of established regional milestones for SO₂ and a backstop trading program, the Transport Region States and Tribes believe that it is appropriate to use the following principles when determining reasonable attribution.

- (i) The attribution process is intended to identify “hot spots” that are caused by the contribution of individual sources, and is not intended to directly address visibility impairment due to regional haze. The SO₂ milestones and backstop trading program have been designed to address regional haze.
- (ii) The frequency, magnitude and duration of visibility impairment should be considered.

The States are in the process of developing guidelines for determining reasonable attribution, and intend to submit these guidelines as part of their State Implementation Plans in 2003. These guidelines will outline the technical basis for making this determination, and may include factors, criteria, and a threshold or metric for determining when impairment can be reasonably attributed to a source and how this level of contribution is to be distinguished from a contribution to

regional haze impairment. The guidelines will be consistent with the states' authority under the Clean Air Act to determine reasonable attribution.

c. Remedy Options.

Three options for remedy are provided in cases where "certification" is executed and a finding of reasonable attribution is made. First, BART retrofit controls can be required on the attributed source(s) of the impact. As a second alternative, states can look for control on other sources of sulfates, besides the BART-eligible facilities impacting the resource. Finally as under current law, sources and states may negotiate a BART "off ramp" in advance of certification, which entails installation and operation of emission controls, or includes other restrictions such as limitations on the purchase of allowances, that satisfies BART for the source. The states may propose a geographic enhancement remedy that involves the award and transferability of credits by the affected source.

C. Other Class I Areas

It is the intention of the states and participating tribes to demonstrate in the 2003 Implementation Plans, that the milestones and backstop trading program will satisfy the "greater reasonable progress than BART" requirements, and any other reasonable progress requirements for additional Class I areas through 2018. This demonstration will apply to all sources of sulfur dioxide participating in that program. The work plan and resources needed to make this demonstration in the 2003 implementation plans will be identified and provided by the WRAP. Class I areas beyond the original 16 will be addressed in the Annex, even if only to identify the process and procedures to address this issue in the 2003 implementation plans.

Further, the states must evaluate other sources and pollutants in order to demonstrate reasonable progress for additional Class I area. Although it is their intent to do so, the states and tribes recognize that it may not be practicable to satisfy the additional Class I area requirements for all other sources of anthropogenic emissions besides stationary sources (e.g., mobile and area source sectors), and for all species of visibility impairing pollutants from stationary sources (e.g., NO_x and PM), by the 2003 deadline. States have the option of addressing these additional issues later, in a 2008 SIP.

Since §309 is designed to address impairment at the 16 Class I areas on the Colorado Plateau, it is important to establish the meaning of the milestones established under §309 for other Class I areas beyond the original 16. For purposes of addressing the additional Class I areas under section 309, the Transport Region States and Tribes must meet the requirements of section 51.309(g) which incorporates two tests: 1) the Plan must demonstrate reasonable progress towards achieving the long-term goal of returning to natural conditions by 2064; and 2) the milestones must demonstrate greater reasonable progress than BART for regional haze in all Class I areas. The technical work that is needed to make these demonstrations will be completed as part of the 2003 State and Tribal Implementation Plans. The following principles are established as part of the Annex.

1. The Grand Canyon Visibility Transport Commission established a broad range of strategies to reduce visibility impairing emissions from all major emission sources in the region, including

stationary sources, mobile sources and fire. The Environmental Protection Agency evaluated the Commission Recommendations and determined that these strategies, if augmented with an approvable Annex, would meet the goal to achieve reasonable progress for the 16 Class I areas of the Colorado Plateau for the first long-range planning period. The Commission work was focused on the Class I areas of the Colorado Plateau, but their recommended strategies are regional in nature and should have benefits for Class I areas beyond the Colorado Plateau.

2. The GCVTC stationary source recommendations were designed to provide flexibility to sources and to achieve the emission reductions needed through a non-regulatory program. If the goals are not met, then a backstop emission trading program would be triggered to ensure that the progress is achieved in the most cost-effective manner. If substantially different requirements are needed for the effected stationary sources of SO₂ in order to meet the reasonable progress goals for other Class I areas, then the underlying goals of the GCVTC stationary source strategy may not be met. Under these circumstances, Transport Region States and Tribes may not pursue the strategies outlined in this Annex, and instead develop plans under section 308 of the RH rule.

3. The WRAP technical committees have been charged with evaluating whether or not it will be possible to analyze the reasonable progress requirements for other mandatory Classes I areas in the 2003 SIPs. If completing the necessary technical analysis by 2003 is not possible, the WRAP expects to provide Transport Region States and Tribes with a technical analysis that is adequate to evaluate whether or not additional SO₂ emission reductions from sources covered by this program are likely. The WRAP also intends to do the analysis necessary to demonstrate that the milestones and backstop trading program satisfy all of the SO₂ BART requirements of the regional haze rule for the sources participating in the program.

D. Backstop Emission Trading Program

If compliance with the SO₂ milestones is not achieved in the region, a backstop emission trading program will be triggered to ensure that the emission reduction goals that have been established are met. The trading program has been designed to allow seamless trading across the region, and to be enforceable and transparent. The trading program as outlined in the draft model rule will meet the following general principles.

1. Emission Cap. If the trading program is triggered, the regional milestones will become an enforceable emission cap for SO₂ in the region. SO₂ allowances under the trading program will be allocated by the participating Transport Region States and Tribes in aggregate in an amount no greater than the regional cap for each year.

2. Seamless Trading Provisions. SO₂ allowances under the trading program will be fungible between all sources within the jurisdiction of Participating Transport Region States and Tribes, and may not be used for any other requirement in any other program, except as stipulated by the model rule.

3. Monitoring. SO₂ emissions of applicable sources will be monitored, recorded, and reported

to the Transport Region States and Tribes and compiled annually. Monitoring protocols will be established to ensure that the emission measurements are accurate and are comparable across source categories.

4. System Administrator. The Transport Region States and Tribes will appoint a Tracking Systems Administrator to track allowances and emissions for purposes of compliance determination and program assessment. The States and Tribes will maintain all regulatory functions, including emissions data certification and enforcement of program requirements.

5. Periodic Audits. The Transport Region States and Tribes will conduct periodic audits of program performance including regional emissions assessments, confirmation of monitoring and reporting accuracy and allowance market integrity, and environmental impacts. In addition, it is likely that a periodic third party audit will be performed.

6. Banking. Banking of excess allowances will be permitted to encourage early reductions and provide sources additional compliance flexibility. The use of banked allowances in the compliance process will be regulated by management provisions, which would act as a disincentive for sources to use banked allowances in years where there is a substantial bank of allowances available for use in compliance.

7. Allocations.

If the backstop trading program is triggered, allocations will be made to applicable sources by the participating Transport Region States and Tribes as described below.

a. General Process and Timing.

(i) The initial allocation of SO₂ allowances will occur twelve months following the program trigger. This initial allocation will cover a period of five years, beginning with the year in which compliance with the trading program is first required.

(ii) Subsequent allocations will occur every five years, beginning five years after the initial allocation.

(iii) A mechanism will be included to the issue of allocations to shut-down sources. The details of this mechanism are still under discussion.

b. Distribution of Allowances. At the beginning of each five-year allowance distribution period, an allowance budget will be calculated for each participating State and Tribe using the process outlined in paragraphs (i) through (iii). The State or Tribe will then distribute allowances to individual sources within their jurisdiction, using the same process that is outlined to calculate the State and Tribal budgets.

(i) **Regional Set- Asides.** The following regional set-asides will be distributed by the

program administrator according to pre-determined agreements between the States and Tribes. The States and Tribes will maintain all regulatory authority, and the program administrator's sole function will be to track the distribution of these set-asides.

(A) Tribal Allocation. A 20,000-ton set aside will be established as a general Tribal allocation. The Tribes in the Transport Region will determine how to distribute these allowances. The 20,000 tons is fully separate and additional to any Tribal budgets as determined using the process described in paragraphs (ii) and (iii).

(B) New Source Set-Aside. A new source set-aside will be established to accommodate regional growth. The new source set-aside shall consist of 9,000 allowances each year for a maximum of 27,000 tons for the years 2003 through 2018. New sources will be required to request an allocation from the applicable State or Tribe. New sources will eventually be incorporated into the floor as allocations are updated over time. Any allowances remaining in the new source set-aside in any year will be carried over for potential use by new sources in the following year until such time that the regional five-year allocation process occurs. If the new source set-aside is depleted, incoming new sources will have to buy allocations from the market.

(ii) State and Tribal Floor Allocation. The floor allocation consists of two components: California RECLAIM sources and existing source-specific floor. The floor allocation is a minimum allocation for all existing sources which will be calculated to ensure that well-controlled sources will receive a full allocation.

(A) California RECLAIM Program. 3,462 SO₂ allowances will be included in the California budget for RECLAIM sources. These credits will be a subset of the existing source pool for the State of California and, hence, will not consume any extra credits from the total pool of credits.

(B) Source-Specific Floor Allocation. A floor allocation will be calculated for all existing sources in the region based on some specified level of control (e.g., BACT, BART, LAER) for non-utility sources. This determination will have to be made by the authorized State or Tribe prior to submittal of their 2000 SIP. The Utility Sector currently has two options based on either an emission rate or a combustion control efficiency.

(iii) Reducible Allocation. From the reducible portion of the allocations, both renewable energy allocations and early reduction credits will be awarded. The remainder of the reducible portion will then be allocated to existing sources.

(A) Source-Specific Early Reduction Bonus Allocation. Sources that reduce their emissions below their 2018 allocation as estimated in the State or Tribal Implementation Plan prior to the program trigger will be eligible for early

reduction bonus allocations. States and Tribes will certify and publish the amount of early reduction bonus allowances that are earned each year until the program is triggered. If the program is triggered, the source will receive a bonus allocation equal to the total sum of these early reduction bonus allowances, divided by ten, for the first ten years of the program.

(B) Renewable Energy Sources. Eligible renewable energy resources that begin operation after October 1, 2000, will receive 2.5 tons of SO₂ allocations per MW of installed nameplate capacity per year. A source beginning operation prior to the program trigger will receive its SO₂ allowance as part of the initial allocation. The allocation will be retroactive to the time of initial operation. Sources beginning operation after the program begins will be awarded allowances for each year of operation at the time of the five-year allocations (including retroactive coverage of prior year operations). An emitting eligible renewable energy source would receive allowances from the new source set-aside and an additional 2.5 allowances per MW of capacity from the reducible portion of the allocations.

An eligible renewable energy resource is defined to mean electricity generated by non-nuclear and non-fossil low or no air emission technologies using resources that are virtually inexhaustible, reduce haze, and are environmentally beneficial. The term includes electricity generated by wind energy technologies; solar photovoltaic and solar thermal technologies; geothermal technologies; technologies based on landfill gas and biomass sources, and new low-impact hydropower that meets the Low-Impact Hydropower Institute criteria. Biomass includes agricultural, food and wood wastes. The term does not include pumped storage or biomass from municipal solid waste, black liquor, or treated wood.

(C) Reducible Allocation.

(i) The remainder of the allowances under the emission cap will be distributed to existing sources based on each source's relative contribution to emissions during 1996 and 1998 for non-utilities and 1995-1999 for utilities. These allowances will be distributed on a regional basis, as compared to the floor allocation which will be done on a source sector basis.

(ii) Should a source be subject to an enforcement action, that source's emissions shall be limited to the appropriate level prescribed by that action, and the allocation methodology will acknowledge that limitation by limiting the source's allowances accordingly.