Order Instituting Rulemaking to Develop an
Electricity Integrated Resource Planning Framework
and to Coordinate and Refine Long-Term
Procurement Planning Requirements

Rulemaking 16-02-007
(Filed February 11, 2016)

COMMENTS OF THE ALLIANCE FOR RETAIL ENERGY MARKETS
ON PROPOSED DECISION

Sue Mara
RTOAdvisors, L.L.C.
164 Springdale Way
Redwood City, CA 94062
Telephone: (415) 902-4108
E-mail: sue.mara@rtoadvisors.com

CONSULTANT TO
ALLIANCE FOR RETAIL ENERGY MARKETS

January 17, 2018
TABLE OF CONTENTS

Subject Index of Recommended Modifications to Proposed Decision
Table of Authorities

I. THE PD SPECIFIES A GENERALLY REASONABLE STARTING POINT FOR THE DEVELOPMENT OF IRPS................................................................. 1

II. THE PD SHOULD BE CORRECTED TO ENSURE LSES HAVE A CLEAR OPTION TO USE THE GHG EMISSIONS BENCHMARK. ............................... 2

III. IRP REQUIREMENTS FOR DISADVANTAGED COMMUNITIES NEED CLARIFICATION.............................................................. 4

IV. PROPOSED REQUIREMENTS REGARDING NATURAL GAS FACILITIES SHOULD BE REMOVED. ............................................................ 6

V. THE COMMISSION MUST ENSURE THAT INFORMATION NEEDED TO MEET IRP REQUIREMENTS IS MADE AVAILABLE TO NON-IOU LSES REGARDING CAM AND OTHER RESOURCES PAID FOR BY ALL LOAD. ........ 7

VI. ERRORS REFERENCING THE COMMISSION’S IRP AUTHORITY TO APPROVE IRP FILLINGS REQUIRE CORRECTION.......................... 9

VII. GHG ACCOUNTING USING “CLEAN NET SHORT” METHODOLOGY APPEARS WORKABLE. ................................................................. 11

VIII. THE PD PROPERLY REJECTS PROPOSALS TO REQUIRE ADDITIONAL PROCUREMENT OF RENEWABLES.................................................. 11

IX. CONCLUSION.......................................................................................................................................................................................... 11

Appendix -- Proposed Revisions to Findings of Fact, Conclusions of Law and Ordering Paragraphs
SUBJECT INDEX OF RECOMMENDED MODIFICATIONS TO PROPOSED DECISION

• Ensure that load-serving entities have the option to use the GHG Emissions Benchmark instead of the GHG Planning Price in creating portfolios that are consistent with the Reference System Plan.

• Clarify the requirements regarding disadvantaged communities.

• Remove the proposed requirement discouraging contracting with or developing natural gas facilities.

• Ensure that required information regarding resources procured through the cost allocation mechanism (“CAM”) and other non-bypassable cost allocation mechanisms be provided expeditiously to non-utility load-serving entities.

• Correct the identified errors regarding the Commission’s authority for integrated resource plans.

• Convene a workshop to address implementation issues that may arise on the Clean Net Short methodology and other IRP requirements.
TABLE OF AUTHORITIES

State Statutes, Codes, Regulations
Public Utilities Code Section 394(f) ............................................................................................... 9
Public Utilities Code Section 454.51 .............................................................................................. 9
Public Utilities Code Section 454.52 .......................................................................................... 1, 9
Public Utilities Code Section 454.52(a)(1)(H) ............................................................................... 5
Public Utilities Code Section 454.52(b)(1) ................................................................................... 10
Senate Bill 350 ........................................................................................................................ 1, 5, 9

CPUC Decisions, Dockets, Rules
Rule 14.3 of the Commission Rules of Practice and Procedure ......................................................... 1
COMMENTS OF THE ALLIANCE FOR RETAIL ENERGY MARKETS
ON PROPOSED DECISION


I. THE PD SPECIFIES A GENERALLY REASONABLE STARTING POINT FOR THE DEVELOPMENT OF IRPS

The PD represents the culmination of a lengthy process to consider the requirements for load-serving entities (“LSEs”) submitting IRPs in accordance with Senate Bill (“SB”) 350 and Public Utilities Code Section 451.52. In this proceeding, AReM has focused on ensuring that any proposed IRP filing requirements are workable, fair and reasonable and reflect, where applicable, differences among LSEs, particularly as to electric service providers (“ESPs”) versus the Investor-Owned Utilities (“IOUs”). AReM is pleased that the PD largely accomplishes these goals and commends Commission Staff for this effort. In particular, AReM appreciates the

---

1 AReM is a California non-profit mutual benefit corporation formed by electric service providers that are active in the California’s direct access market. This filing represents the position of AReM, but not necessarily that of a particular member or any affiliates of its members with respect to the issues addressed herein.
clarification provided in the PD that ESPs are permitted to submit one integrated IRP\(^2\) and the direction provided on how to calculate the LSE-specific GHG Emission Benchmark.\(^3\) However, AReM has identified a few aspects of the PD that require correction, clarification or modification. AReM respectfully requests Commission attention to these matters as set forth below.

II. **THE PD SHOULD BE CORRECTED TO ENSURE LSES HAVE A CLEAR OPTION TO USE THE GHG EMISSIONS BENCHMARK.**

As noted in the PD, AReM supported the option for ESPs to use the GHG Emissions Benchmark instead of the GHG Planning Price to create portfolios that are consistent with the Reference System Plan (“RSP”):\(^4\) The PD concurred that LSEs should be given the option of using the GHG Emissions Benchmark:

> We agree with SCE’s suggestion that each LSE be given the option to plan utilizing a GHG Planning Price (for LSEs conducting more detailed modeling and planning) or a GHG benchmark (discussed further in Section 12 of this decision).\(^5\)

This optionality is further specified in (i) Conclusions of Law Nos. 23\(^6\) and 24,\(^7\) which clearly provide the option, and (ii) the requirements set forth in the Standard LSE template, provided as Attachment A to the PD.\(^8\)

However, several other statements in the PD seem to conflict with this approach. These conflicting statements should be modified in order to eliminate any confusion or

\(^2\) PD, p. 102.
\(^3\) PD, pp. 102-103 and Attachment A, p. 5.
\(^4\) PD, p. 91.
\(^5\) PD, p. 95.
\(^6\) PD, Conclusion of Law No. 23, p. 125: “The Commission should allow LSEs to utilize a GHG Emissions Benchmark …” (Emphasis added.)
\(^7\) PD, Conclusion of Law No. 24, p. 125: “An LSE should be required to create a conforming portfolio to the RSP by utilizing *either* the GHG Planning Price or their GHG Emissions Benchmark …” (Emphasis added.)
\(^8\) PD, Attachment A, p. 4 and p. 5.
misunderstandings as to how the GHG Emissions Benchmark may be used to prepare a compliant IRP. The first such conflict appears on page 95 in the body of the PD, where it states “[f]or all LSEs utilizing the GHG Planning Price, which must include all LSEs filing Standard IRPs ...”9 This statement appears to eliminate the optionality to use the GHG Emission Benchmark in lieu of the GHG Planning Price for certain LSEs. On page 102, the PD describes the GHG Emissions Benchmark as “an alternative to the GHG Planning Price methodology ... for LSEs filing alternative IRP Plans ...”10 Again, this statement seems to limit the use of the GHG Emissions Benchmark only to those LSEs who are permitted to file alternative IRP Plans, rather than being an approach that all LSEs could elect to use. Also on page 102, the PD states that “LSEs may utilize” the “adopted GHG benchmarks” “in addition to or instead of the GHG Planning Price ...”,11 which clearly provides the option to the LSEs. Finally, Finding of Fact No. 14 states that LSEs filing a Standard Plan “should use” the GHG Planning Price,12 which again signifies that LSEs have an option.

AReM respectfully requests that this conflicting language be corrected to provide LSEs with the clear option to use the GHG Emissions Benchmark. Larger ESPs will be submitting the Standard Plan and it would be unreasonable to require them to conduct the modeling necessary to make proper use of the GHG Planning Price. As AReM previously explained, the GHG Planning Price appears to be most relevant for the IOUs, which are likely to use sophisticated

---

9 PD, p. 95.
10 PD, p. 102.
11 Ibid.
computer models to develop their IRPs. By contrast, ESPs will likely find it simpler and more efficient to use the GHG Emissions Benchmark.\textsuperscript{13}

Accordingly, AReM proposes the following changes to the body of the PD:

**PD, page 95**

For LSEs utilizing the GHG Planning Price, which must include all LSEs filing Standard IRPs as further defined in Section 13 of this decision, we modify the staff recommendation, and instead require that these LSEs utilize the actual RESOLVE output of the GHG abatement prices, rather than the straight-line methodology originally suggested by staff.

**PD, page 102**

As suggested by SCE, we will adopt it as an option to be used voluntarily by LSEs as an alternative to the GHG Planning Price methodology described in Section 11 of this decision, for LSEs filing alternative IRP plans described further in Section 13 of this decision.

In addition, AReM requests modifications to Finding of Fact No. 14 clarifying that LSEs have the option to use the GHG Emissions benchmark in their planning. AReM’s proposed revision is provided in the Appendix attached to these comments.

**III. IRP REQUIREMENTS FOR DISADVANTAGED COMMUNITIES NEED CLARIFICATION.**

The PD requires that all LSEs address disadvantaged communities in their IRPs.\textsuperscript{14} AReM does not object to this requirement, but notes that the PD and applicable Ordering Paragraph conflict and thus need clarification.

The discussion in Section 6.3 of the PD sets forth nuanced requirements that differ for LSEs.\textsuperscript{15} For example, the PD specifically notes that ESPs are “a bit differently situated” and

\textsuperscript{13} *Comments of the Alliance for Retail Energy Markets in Response to September 19, 2017 Administrative Law Judge’s Ruling*, R.16-02-007, October 26, 2016, p. 4.

\textsuperscript{14} PD, p. 56. See also, Conclusion of Law No. 14, p. 126.
“may not serve contiguous ‘territories’ or geographic areas the way IOUs and CCAs do.”\(^{16}\) The PD then provides guidance on what it expects from ESPs, namely that they “should be able to easily identify not only the location of the customers they serve, but also the location of the generation sources they buy power from to serve those customers.”\(^{17}\) The PD also lists “minimum” information on disadvantaged communities to be provided by all LSEs.\(^{18}\) AReM greatly appreciates this direction. However, the discussion in the PD conflicts with Ordering Paragraph No. 6, which does not list any “minimum” information requirements and excludes discussion of differently-situated LSEs.\(^{19}\)

Moreover, the requirements in PD Section 6.3 and Ordering Paragraph No. 6 differ from those found in the Standard Plan template, which focus on minimizing local air pollutants “with early priority on disadvantaged communities.”\(^{20}\) AReM notes that these requirements specified for the Standard Plan are fully consistent with the applicable provision of SB 350,\(^{21}\) whereas the requirements in Section 6.3 and Ordering Paragraph No. 6 are more expansive.

LSEs need clarity and consistency regarding the requirements for disadvantaged communities. AReM proposes modifying Ordering Paragraph No. 6 simply to reference Section 6.3, rather than attempt to enumerate the requirements specified therein and where those requirements may differ for different types of LSEs. AReM provides suggested language for this modification in the Appendix attached to these comments.

\(^{15}\) PD, pp. 55-57.
\(^{16}\) PD, p. 55.
\(^{17}\) Ibid.
\(^{18}\) PD, p. 56.
\(^{19}\) PD, Ordering Paragraph No. 6, pp. 129-130.
\(^{20}\) PD, Attachment A, p. 8.
\(^{21}\) Public Utilities Code Section 454.52(a)(1)(H).
IV. PROPOSED REQUIREMENTS REGARDING NATURAL GAS FACILITIES SHOULD BE REMOVED.

The PD and Ordering Paragraph No. 7 include a new requirement that was not previously proposed or vetted in this proceeding. Specifically, the Commission now intends to require LSEs developing a new natural gas resource or re-contracting with an existing such resource to include in their IRPs a “showing justifying why another lower-emitting resource could not meet the need identified.”22 This new requirement is an apparent attempt to constrain or restrict natural gas facilities in disadvantaged communities and elsewhere in California. AReM opposes this requirement as unjustified, unwarranted and unwise.

In particular, AReM notes the irony of a requirement to limit contracting of natural gas facilities on one hand while acknowledging on the other that the Staff’s modeling results show a need for such facilities. As the PD explains, the Staff’s modeling results demonstrate that “natural gas resources already delivering energy to the CAISO are needed for reliability and renewable integration purposes through 2030 to reduce overall system costs” and that “keeping existing gas capacity available was predicted as more cost-effective than retiring gas plants and acquiring new ones, or alternative replacement capacity, to serve reliability and integration needs.”23 As a consequence, the PD elects to “direct staff to continue to work with the CAISO to study the most important attributes of the natural gas fleet and work in coordination with the resource adequacy proceeding activities.”24

Given the Commission’s own recognition that natural gas facilities are needed to meet reliability needs for the entire IRP planning period, AReM urges the Commission to revise the PD to remove this requirement. AReM proposes the required changes to Conclusion of Law No.

---

22 PD, Ordering Paragraph No. 7, p. 130. See also, PD, p. 57 and Conclusion of Law No. 15, p. 126.
23 PD, p. 116.
24 PD, p. 117.
Finally, because of the clear nexus between natural gas generation and emissions in disadvantaged communities within the electric sector, we will require that any LSE proposing to develop new natural gas resources or recontract with existing natural gas resources in their IRP, regardless of whether it is located in a disadvantaged community, make a showing as to why another lower-emitting resource could not meet the need identified.

V. THE COMMISSION MUST ENSURE THAT INFORMATION NEEDED TO MEET IRP REQUIREMENTS IS MADE AVAILABLE TO NON-IOU LSES REGARDING CAM AND OTHER RESOURCES PAID FOR BY ALL LOAD.

The PD does not address IRP requirements for resources with costs recovered through the Cost Allocation Mechanism (“CAM”) or through other cost recovery paid for by all load. In fact, the only reference to CAM appears in the Standard Plan template, where it states that LSEs’ IRPs “should account for any resources subject to the” CAM in their portfolios and “should not make assumptions or predictions on what resources may be subject to the CAM in the future.”25 Obviously, all non-IOU LSEs will indeed have “resources subject to” the CAM in their portfolios and this cryptic reference does not provide adequate guidance.

AReM has previously requested guidance in this proceeding concerning accounting for resources procured by the IOUs on behalf of all customers through CAM or similar cost-recovery mechanisms.26 GHG accounting for such resources is a particularly thorny issue. In fact, the IOUs requested such guidance in their comments on the September 19, 2017 ruling27 in this proceeding. For example, San Diego Gas & Electric Company (“SDG&E”) noted the

26 See, for example, Reply of the Alliance for Retail Energy Markets to Comments Submitted in Response to September 19, 2017 Administrative Law Judge’s Ruling, R.16-02-007, November 9, 2016, pp. 4-5.
complexity of assigning GHG emissions from CAM and other resources procured by the IOUs “on behalf of” all load, such as combined-heat-and-power ("CHP"). And Pacific Gas and Electric Company ("PG&E") asked which LSEs will be allocated the GHG emissions from CAM resources.

Moreover, GHG accounting is only part of the puzzle. IRP requirements also include reporting on localized pollutants, locational information, operational characteristics, and information relative to disadvantaged communities. The non-IOUs have no such information on resources procured on-behalf-of all load. Put simply, such information is both unknown and unknowable for non-IOU LSEs, given current confidentiality requirements. Thus, it is completely unreasonable for the Commission to require non-IOU LSEs to “account for” such resources in their portfolios, as specified in the Standard Plan template.

In addition to CAM, the IOUs also currently recover the costs of energy storage, demand response, energy efficiency, combined heat and power, and other resources through non-bypassssable transmission, distribution, and public purpose charges. ESPs receive Resource Adequacy (“RA”) credit for this procurement as applicable and are also able to “count” IOUs’ energy storage procurement paid for by all toward their own storage targets. ESP customers pay the net capacity costs for these facilities, in the case of CAM, or the full resource costs, in the case of the other non-bypassable charges. Much of this on-behalf-of procurement by the IOUs is under long-term contracts or utility ownership. Surely, the ESPs should therefore “count” this IOU procurement as part of their IRPs. To do anything less would be unfair, unreasonable and anti-competitive. Just how should this be accomplished? The PD provides no guidance.

28 SDG&E’s October 26th Comments, R.16-02-007, pp. 22-23.
29 PG&E’s October 26th Comments, R.16-02-007, p. 17.
Accordingly, AReM respectfully requests that the Commission require the Staff or the IOUs to provide non-IOU LSEs with all information needed to comply with the IRP requirements regarding accounting for resources procured on-behalf-of all load. AReM proposes adding a new Ordering Paragraph to implement this requirement, which is provided in the Appendix attached to these comments. To the extent the IOUs need guidance on how to accomplish this task, AReM requests that a workshop be convened immediately to address and resolve this issue. IRPs are due June 1 and therefore time is of the essence.

VI. ERRORS REFERENCING THE COMMISSION’S IRP AUTHORITY TO APPROVE IRP FILINGS REQUIRE CORRECTION.

Finding of Fact No. 2 in the PD states that “Section 454.51 creates a responsibility for the Commission to require, review, and approve IRP filings from all load-serving entities.” However, Section 454.51 does not address IRPs at all. IRPs are solely discussed in Section 454.52 of the statute. Moreover, the statement that the Commission has a “responsibility” to “approve” LSEs’ IRP filings is not supported by the language in either Section of the statute. In addition, Conclusion of Law No. 6 makes a similar claim that the Commission has specific authority to “approve” ESPs’ IRP filings without reference to any statutory provision conveying that authority. In fact, SB 350 and the pertinent provisions, Sections 454.51 and 454.52 of the

---


31 As the Commission also acknowledges in the PD, p. 25, its authority with respect to ESPs is limited pursuant to Public Utilities Code Section 394(f): “Registration with the commission is an exercise of the licensing function of the commission, and does not constitute regulation of the rates or terms and conditions of service offered by electric service providers. Nothing in this part authorizes the commission to regulate the rates or terms and conditions of service offered by electric service providers.”

32 PD, Conclusion of Law No. 6, p. 125. See also, PD, p. 25.
Public Utilities Code, do not convey authority to the Commission to “approve” IRP filings – a point that AReM has made previously in this proceeding.33

In discussing the Commission’s authority relative to IRP filings by LSEs, the PD states that the “plain language” of Section 454.52(b)(1) “summarizes the process best.”34 That section reads as follows:

Each load-serving entity shall prepare and file an integrated resource plan consistent with paragraph (2) of subdivision (a) on a time schedule directed by the Commission and subject to commission review.35

AReM agrees. The “plain language” of the statute should govern. In accepting that conclusion, however, the Commission must also accept the fact that the “plain language” authorizes the Commission only to review LSEs’ IRPs.36 The authority to “approve” the IRP of an ESP or, indeed, any LSE, is nowhere to be found.

Accordingly, AReM respectfully requests that the PD be revised to correct these errors. Proposed provisions to the applicable Finding of Fact and Conclusion of Law are provided in the Appendix attached to these comments. AReM also requests that the following corrections be made to the body of the PD, page 25:

We acknowledge our lack of involvement in setting the rates or terms of service for ESPs, but Sections 454.51 and 454.52 still apply to all LSEs, and give the Commission responsibility for reviewing and approving the plans of all LSEs.

33 See, for example, Comments of the Alliance for Retail Energy Markets on Energy Division Staff Proposal for Implementing Integrated Resource Planning at the CPUC, R.16-02-007, June 28, 2017, p. 5.
34 PD, p. 24.
35 Public Utilities Code Section 454.52(b)(1). Emphasis added.
36 Ibid.
VII. GHG ACCOUNTING USING “CLEAN NET SHORT” METHODOLOGY APPEARS WORKABLE.

AReM’s preliminary review of this GHG accounting method indicates that it appears to be workable. However, AReM is concerned that questions may arise when LSEs put this methodology into practice. AReM requests that Staff convene a workshop in March or April to address questions on this methodology and other implementation issues as the LSEs develop their IRPs in compliance with the decision.

VIII. THE PD PROPERLY REJECTS PROPOSALS TO REQUIRE ADDITIONAL PROCUREMENT OF RENEWABLES.

AReM and many other parties opposed mandated early procurement of renewables for any reason, but, in particular, to take advantage of federal tax credits that may be expiring. The PD properly rejects these proposals, citing uncertain cost savings, a lack of need for additional renewables, and the adverse effects related to on-behalf-of procurement on departing load. The PD further concludes that the Commission’s “efforts are better spent examining opportunities to ensure greater flexibility in the RPS compliance market.” AReM strongly concurs and urges the Commission to retain this aspect of the PD unchanged.

IX. CONCLUSION.

AReM applauds the Commission and its Staff for proposing generally reasonable requirements for LSEs submitting IRPs. AReM also strongly supports the PD’s rejection of proposals to require additional procurement of renewables. However, AReM has identified several issues that require correction, clarification or modification as follows:

37 See, for example, AReM’s October 26th comments, *loc. cit.*, pp. 3 and 9.
38 PD, pp. 81-83. See also, Findings of Fact No. 10, pp. 122-123 and Conclusions of Law Nos. 16 and 20, p. 126.
39 PD, p. 83.
• Correct the PD as proposed by AReM to ensure that LSEs have the option to use the GHG Emissions Benchmark.

• Ensure the requirements regarding disadvantaged communities in Ordering Paragraph No. 6 are consistent with Section 6.3 of the PD.

• Remove the proposed requirement discouraging contracting with or developing natural gas facilities.

• Ensure that the information needed to comply with IRP requirements regarding resources procured through CAM and other non-bypassable cost allocation mechanisms be provided expeditiously to non-IOU LSEs.

• Correct the errors identified regarding the Commission’s IRP authority.

• Convene a workshop in March or April to address implementation issues that may arise on the Clean Net Short methodology and other IRP requirements.

AReM respectfully requests that the Commission adopt AReM’s corrections and modifications as proposed herein and in the Appendix attached to these comments.

Respectfully submitted,

Sue Mara
CONSULTANT TO
ALLIANCE FOR RETAIL ENERGY MARKETS

January 17, 2018
APPENDIX

PROPOSED REVISIONS TO FINDINGS OF FACT AND CONCLUSIONS OF LAW

Revisions to Finding of Fact No. 2
2. Section 454.52 creates a responsibility for the Commission to require, and review, and approve IRP filings from all load-serving entities.

Revisions to Finding of Fact No. 14
14. An LSE filing a Standard Plan, as defined in this decision, may use the GHG Planning Price identified in Table 5 or the GHG Emissions Benchmark, for developing its 2018 IRP filing.

Revisions to Conclusion of Law No. 6
6. Sections 454.51 and 454.52 do not create any exception from the Commission’s responsibilities with respect to electric service providers. The Commission’s authority includes review and approval of ESP IRP filings.

Deletion of Conclusion of Law No. 15
15. The Commission should require a showing from any LSE seeking to acquire new or re-contract with existing natural gas resources as part of its IRP filing, justifying why the need met by such a resource cannot be met by another, lower-emitting resource.

PROPOSED REVISIONS TO ORDERING PARAGRAPHS

Revisions to Ordering Paragraph No. 6
6. The integrated resource plan of each load-serving entity (LSE) required in Ordering Paragraph 1 shall include the information related to disadvantaged communities as described in Section 6.3.
• A description of which disadvantaged communities, if any, the LSE serves.
• What current and planned activities/programs of the LSE, if any, impact disadvantaged communities.
• A qualitative description of the demographics of the customers the LSE serves and how it is currently addressing or plans to comply with the requirement to minimize air pollutants.
• Detailed estimates of emission of annual greenhouse gases and local air pollutants (including at least, nitrogen oxides and particulate matter), as well as annual starts of natural gas plants. These emissions estimates shall include emissions due to cycling as well as normal operations. Locational information for all planned resources if proposed to be located in a disadvantaged community, including both emitting and non-emitting resources.
• Planned activities to conduct outreach and seek input from any disadvantaged communities that could be impacted by any procurement activities.
• A summary of issues raised by residents or organizations representing disadvantaged communities during outreach activities.
• A description of evaluation criteria that will be used to evaluate procurement of generation or storage resources located in disadvantaged communities, including any scoring bonuses or other approaches to ensuring early priority on disadvantaged communities.

Deletion of Ordering Paragraph No. 7

7. Any load serving entity proposing to develop new natural gas resources or re-contract with existing natural gas resources in their integrated resource plans required by Ordering Paragraph 1 shall make a showing justifying why another lower-emitting resource could not meet the need identified.

Addition of New Ordering Paragraph

XX. The Commission shall ensure that the IOUs or Commission staff provide non-IOU load-serving entities the detailed information needed to comply with the IRP filing requirements regarding the CAM and other resources procured on-behalf-of all load. If necessary, Commission staff shall convene a workshop immediately to address and resolve this issue expeditiously.