

ABC's Weekly Federal Legislative Update March 30, 2020

Introduction

Last week, Congress passed, and President Trump signed into law the largest federal relief package in U.S. history which aims to blunt the devastating impact of the coronavirus on the economy. Congress has indicated that its far from finished in its goal to help states, local governments, companies and individuals whose livelihoods have been impacted by the virus itself or efforts to mitigate is spread. The following are news stories from Washington, D.C.

Administration

EPA Eases Gas Blending Requirements

Last week, the EPA announced a number of measures in response to the Coronavirus outbreak including allowing for continued sale of winter grade gasoline until late May and extending deadlines for compliance with the RFS.

Marc Heller of <u>E&E News PM</u> wrote on March 27, "EPA today said it will temporarily ease some gasoline and biofuel blending requirements in response to market conditions brought on by the novel coronavirus crisis.

"The agency said it would allow for continued sale of winter-grade gasoline through May 20, to allow retailers to sell what remains in their storage tanks because of depressed demand during the crisis.

"And in a nod to small refineries, EPA said it won't immediately scale back biofuel blending requirements for small refineries in response to a January decision by the 10th U.S. Circuit Court of Appeals. That decision, the subject of an appeal by refineries, would greatly reduce the number of exemptions and possibly force EPA to rescind some already issued.

"EPA said it would also extend compliance dates for small refineries for the renewable fuel standard "to provide them with additional flexibility." Specifics will be in a forthcoming announcement, EPA said. "Today's announcement reflects EPA's response to sinking demand and prices for liquid fuels as Americans reduce travel in response to the crisis. It also illustrates the agency's continuing effort to balance the interests of the biofuel industry with those of oil refiners that say the RFS's mandates to mix biofuel into gasoline impose an economic hardship.

"With the response to the coronavirus taking precedence, EPA said, "investigating and initiating enforcement actions against small refineries that were previously subject to an exemption is a low priority for agency."

"The agency will move ahead with implementation and enforcement of the 10th Circuit ruling once appeals have been resolved and the court has issued a mandate, EPA said.

"The seasonal changes in gasoline deal with the fuel's volatility rating, which is related to smog and air pollution. Winter gasoline has a higher volatility rating than summer gasoline.

"That's an issue that played into the debate over higher-ethanol fuel such as E15, for example. When EPA last year allowed for E15 sales year-round, it did so by waiving the volatility rules that had kept that fuel unavailable in the summer.

"In this case, the American Fuel and Petrochemical Manufacturers asked EPA to waive the summertime regulations.

"Without a waiver, the agency said, retailers might have to stop selling winter-grade fuel on May 1, preventing the loading of summer gasoline into storage tanks.

"By waiving the low volatility and blending limitations through May 20, 2020, EPA will ensure a steady supply of gasoline," the agency said. "EPA will continue to monitor the adequacy of gasoline supplies and, should conditions warrant, may modify or extend this waiver at a later date."

Trump Administration Passes on Appealing 10th Circuit Court of Appeals Ruling

The Trump administration has decided to forgo appealing the 10th Circuit Court of Appeals ruling which said that the EPA should be more limited in its use of Small Refinery Exemptions. Nevertheless, refiners that are affected by this decision are asking the court to reconsider the ruling.

On March 25, Marc Heller of <u>Greenwire</u> published, "The Trump administration won't appeal a court ruling that limits EPA's ability to exempt small refineries from biofuel blending requirements — but the dispute is far from over.

"Petroleum refiners affected by the case are asking the full 10th U.S. Circuit Court of Appeals to reconsider the ruling, which was made by a three-judge panel in January, even as the Trump administration has decided to let the decision stand.

"HollyFrontier Corp. and Wynnewood Refining Co. LLC appealed the ruling, which denied exemptions to three refineries the companies own in Utah, Wyoming and Oklahoma. EPA can only extend existing exemptions from the program's earlier days, not grant new ones, the court said.

"The administration's move wasn't a surprise to the industries involved, following news reports in recent days that yesterday's deadline for an appeal would pass without any request from the Justice Department.

"Still, groups on either side of the debate over the renewable fuel standard's biofuel mandates offered competing views of the administration's decision. The court's ruling, if applied nationally, would sharply reduce the number of exemptions EPA grants small refineries in cases of economic hardship.

"Abiding by the court's ruling is the right thing to do at a time when our industries and rural America are already suffering from the effects of COVID-19, the Saudi-Russia oil price war and ongoing trade disputes," said the Renewable Fuels Coalition, a pro-biofuel group including the National Farmers Union. "We look to the RFS as a source of demand stability and certainty, especially in these troubling times."

"The National Biodiesel Board said its members are dealing with the effects of dozens of exemptions EPA issued in recent years and that it expects EPA to consider current petitions for exemptions in a way that heeds the 10th Circuit ruling.

"EPA's small refinery exemptions destroyed demand for hundreds of millions of gallons of biodiesel and renewable diesel over the past three years," said Kurt Kovarik, vice president of federal affairs at the National Biodiesel Board. "Producers are still struggling to regain momentum and growth; a handful of facilities remain closed after shutting down last year."

"Groups critical of the RFS countered with predictions of dire economic conditions in their industry, as well, especially if prices for renewable fuel credits, called RINs, spike with the prospect of fewer small refinery exemptions. Refineries buy the credits to show compliance with the renewable fuel standard.

"The refining sector is in a precarious position given the current global health emergency that has suppressed demand for motor fuels," said the Fueling American Jobs Coalition, composed of small refineries, the labor unions that represent their workers and gas station owners. "Now is the wrong time for agri-business interests and their speculator colleagues to play games with RINs prices."

"The American Fuel and Petrochemical Manufacturers charged President Trump with abandoning refinery workers and their communities.

"We are nevertheless optimistic this flawed decision will be overturned," said the group's chief executive, Chet Thompson, "and in the meantime will press ahead with every other tool at our disposal to reform the broken RFS program."

Congress

Outlook for Fourth Coronavirus Package

Congress passed a third coronavirus relief package at the end last week. This most recent legislation did not contain provisions that would assist those in the renewable energy or environmental sectors. However, as the ABC has understood from senior level leadership staff, further stimulus packages are exceptionally likely and will contain policies to help drive the energy and environment sectors of the economy.

<u>E&E Daily</u> reporters Geof Koss and George Cahlink submitted on March 27, "While Capitol Hill has been largely united on the \$2 trillion pandemic package moving this week, congressional leaders aren't in sync about how or what legislation should come next.

"House Democratic leaders are eyeing a new round of spending focused on direct aid to state and local communities and workers laid off due to the economic downturn.

"Republicans, however, are urging more caution and saying they want to see the impact of the largest aid bill ever written before deciding what more is needed.

"Senate Majority Leader Mitch McConnell (R-KY) wanted the next bill to be a cash infusion to agencies, but Democrats succeeded in pushing the issue in the current measure.

"We want more. And this was a big strong step, but we need more," said Speaker Nancy Pelosi (D-CA), who added she was "certain" the \$2 trillion plan would clear the House today after it was unanimously passed by the Senate on Wednesday night.

"Pelosi said the next package would move from "emergency mitigation to recovery" by focusing on ways to help the economy create more jobs.

"She did not specify what jobs she would aim to create, although Democrats have in the past talked about the need for more green economy jobs and well-paying jobs that would come from massive federal infrastructure spending.

"Senate Minority Leader Chuck Schumer (D-NY) said the "odds are we will need more legislation," but added he needed to know more about the extent of the crisis before saying what shape it would take.

Lukewarm Republicans

"House Majority Leader Kevin McCarthy (R-CA) yesterday cautioned against rushing into talks on another stimulus, saying members should focus on helping their own communities cope with the virus.

"I wouldn't be so quick to say you have to write something else," McCarthy told reporters at a press conference. "Let's let this bill work, just as long as we let the other two bills work, as well, and whatever decision we have to make going forward, let's do it with knowledge. Let's do it with the experience of what is on the ground at that moment in time."

"The House's top Republican continued to blame the Democrats' hard-line negotiating tactics for delaying final passage of the stimulus, even as members of his own caucus, including Representative Thomas Massie (R-KY), were publicly musing about showing up to object to this morning's voice vote.

"What Democrats did was a total disgrace," McCarthy said, accusing them of bringing the Green New Deal to the talks.

"Asked about Massie's potential objection to a voice vote, President Trump said there may be "one grandstander. You may have one grandstander."

McConnell said Wednesday, just before adjourning until April 20, that the Senate would stay "nimble" and did not rule out coming back earlier if it needed to move new legislation.

"Let's stay connected and continue to collaborate on the best ways to keep helping our states and country though this pandemic," he added.

"A spokesman for Senate Environment and Public Works Chairman John Barrasso (R-WY) said he would try to include his bipartisan highway infrastructure bill in future legislation "to help the economy recover," after it was left out of the \$2 trillion deal.

"Pelosi yesterday said she hoped infrastructure could be addressed in future talks. "That has always been a bipartisan initiative," she said.

"She noted she wants more funds for local governments, additional family medical leave and direct payments to individuals.

"Pelosi did not offer a date for when the House would resume regular session after today's action, in which members will have the unprecedented chance to speak remotely about the bill via C-SPAN to avoid gathering at the Capitol.

"I think everybody has to be on a call for what we need, when we need it, and we don't know what that might be. But whatever it is, we'll be ready," Pelosi said.

Energy, environment issues

"Despite Republicans' claims that Democrats were threatening to sink the bill because of windmills and solar panels, clean energy taxes were never a priority in the stimulus negotiations.

"A proposal to link airline assistance to carbon emission reductions was also not included in the final deal. Energy issues will resurface in the next round of stimulus talks, however, with clean energy backers already gearing up. The trade group Advanced Energy Economy weighed in yesterday with the release of an open letter to lawmakers that called for the conversion of a key renewable investment tax credit to a direct payment, among other options for easing the pressures of COVID-19 on the clean energy sector.

"Protecting public health is paramount in this crisis, but action is also needed to ensure that the advanced energy industry is able to contribute to economic recovery once the crisis has passed," wrote Advanced Energy Economy CEO Nat Kreamer.

"The omission of \$3 billion the Trump administration wanted to fill the Strategic Petroleum Reserve with private crude is likely to remain a flashpoint in future negotiations, too.

"House Energy and Commerce ranking member Greg Walden (R-OR) lamented that funds to purchase oil for the SPR did not make it into the final deal.

"We advocated to buy oil while it was cheap and put it in the strategic stockpile," Walden said on Bloomberg Television yesterday. "We couldn't get that done. I think it would have made perfect business sense and economic sense for taxpayers."

"However, he lauded language authorizing the Energy Department to cancel a congressionally mandated crude sale, which the department did.

"More than three dozen House Democrats yesterday urged congressional leaders to consider environmental justice in crafting the next round of COVID-19 stimulus.

"We are concerned that environmental justice communities — low-income communities, communities of color, and Tribal and indigenous communities — across the U.S. and in the U.S. territories are especially vulnerable and live in areas that lack the necessary resources to fully recover from the pandemic," wrote 45 members, led by House Natural Resources Chairman Raúl Grijalva (D-AZ) and Representative Donald McEachin (D-VA).

"The environmental group 350.org called it a "step in the right direction" that Congress rejected the SPR funding but said climate actions needed to be a part of any future stimulus packages.

"Along with immediate relief, we need a long-term, climate-resilient recovery plan that charts a bold path forward to a livable future for all. There is no going back to 'business-as-usual' after this pandemic. We need a reboot," said a statement.

"Congress must prioritize real climate action that creates millions of jobs, sustains families, responds to systemic inequity, and directly invests in Black, Indigenous, and communities of color facing economic insecurity."

Reporter Manuel Quiñones contributed.

Energy and Environmental Groups Regroup for the Next Coronavirus Bill

The following story outlines the renewable energy and environmental groups' objectives for the next stimulus package.

Nick Sobczyk, Jeremy Dillion and Kellie Lunney of <u>E&E Daily</u> wrote on March 26, "Environmentalists and clean energy industry groups were largely left out of the massive coronavirus stimulus bill that passed the Senate yesterday, but they're holding out hope Congress will heed their calls for help in future relief bills.

"The contours of how the next phase of COVID-19 aid will play out are unclear, with staff exhausted from days of negotiations and many lawmakers already uneasy about gathering again in Washington to vote on legislation.

"But lobbyists and industry groups widely expect more targeted relief packages to be negotiated in the coming weeks and months.

"Environmentalists and the renewables industry are hoping both for near-term provisions to help struggling wind and solar companies, and for broader stimulus efforts that could include boosts for clean energy infrastructure and local transit agencies, and possibly extensions of renewable tax credits.

"Even former Vice President Joe Biden, who is expected to carry the Democratic nomination for president this fall, said yesterday that future COVID-19 relief is an opportunity "to use my green deal to be able to generate both economic growth as consistent with the kind of infusion of monies we need into the system to keep it going."

"For now, renewable energy groups said they're happy with broader provisions in the third tranche of relief, including expansions of unemployment insurance and direct aid for businesses.

"In a potential fourth stimulus package, the wind and solar industries are looking for the kind of targeted relief that was left out of the third bill.

"It's really about how we keep the solar projects that are planned moving," said Abigail Ross Hopper, president and CEO of the Solar Energy Industries Association.

Tax credits

"On top of the list is extending safe harbor deadlines for renewable energy tax credits to allow projects delayed by the crisis to claim incentives.

"Renewable industry groups also want direct pay or refundability options for tax incentives to alleviate concerns about the availability of tax equity.

"The COVID-19 pandemic is harming the wind industry's ability to build the wind farms envisioned by Congressional legislation and putting at risk 35,000 wind energy jobs," American Wind Energy Association CEO Tom Kiernan said in a statement yesterday.

"To best protect these jobs and the health of our existing workforce, we are asking Congress to immediately extend the schedule and improve the liquidity of our existing tax credits," he said.

"Those ideas already have some currency with lawmakers. They were among the recommendations for the third stimulus package in a letter sent Friday by Democrats on the Select Committee on the Climate Crisis.

"And while renewable credits were the subject of intense partisan debate on the Senate floor this week — with Republicans accusing Democrats of attempting to slip the Green New Deal into the stimulus — one renewable industry lobbyist said GOP offices are generally receptive to extending incentive deadlines or offering direct pay.

"Environmental groups, too, are happy to help the push to keep wind and solar afloat during the economic downturn.

"With so many interests still on the table, "there's a huge appetite, and almost certainty that we will see at least a fourth stimulus package, if not another after that," said Melinda Pierce, legislative director for the Sierra Club.

"I do think that emergency recovery, emergency stabilization for clean energy industries — for wind, for solar, for production of electric vehicles — will be a central part of that next package," Pierce said.

"The solar industry stands to lose roughly half its workforce, according to the Solar Energy Industries Association, while the American Wind Energy Association said COVID-19 puts roughly \$35 billion of investment in jeopardy.

"The American Council on Renewable Energy, meanwhile, circulated a survey of renewable companies yesterday that found wide swaths of the industry worried about tax credit deadlines and supply chain issues.

"When lawmakers turn their attention to measures aimed at bolstering specific sectors of the economy adversely impacted by coronavirus, we want to make sure they

understand how supply chain disruptions and other pandemic-related delays are threatening the jobs of hundreds of thousands of workers in the renewable sector and the time-sensitive tax incentives on which renewable project financing depends," Gregory Wetstone, president and CEO of the American Council on Renewable Energy, said in a statement.

Green group asks

"Although congressional Democrats have shied away from the Green New Deal label, environmental and progressive groups certainly see potential future stimulus bills as a way to fight climate change and shore up the clean energy transition.

"That could include extensions of renewable credits, new incentives for energy storage and expanding eligibility for the existing electric vehicle tax credit, environmentalists said.

"We think it's important to focus funding and programs in those places that help address these other ongoing crises, like climate change and environmental injustice, and in the businesses and the workers who are helping lead those fights," said Matthew Davis, legislative director for the League of Conservation Voters.

"Conservation and outdoor recreation groups also want the next round of coronavirus economic stimulus legislation to include a bipartisan, bicameral bill that significantly invests in public lands.

"S. 3422, the "Great American Outdoors Act," has 58 Republican and Democratic cosponsors. It would designate up to \$9.5 billion during the next five years to fix ailing national parks and public lands and establish mandatory annual funding for the Land and Water Conservation Fund.

"Jessica Wahl, executive director of the Outdoor Recreation Roundtable, said LWCF projects that are "close to home" for people during this public health crisis "couldn't be more critical."

"Wahl, who lives in Baltimore, talked about a trail run she did earlier this week near her home.

"When I think about what I've had to do, where I've gone, it's these local and state parks," she said, adding that there is no better way now to social distance than on your own bike, in your own tent or recreational vehicle, somewhere that isn't crowded or far from home.

"It's important to have those programs fully funded," she said.

"Many of the projects in the "Great American Outdoors Act" are shovel ready, said a lobbyist with an outdoor group who confirmed they were working to get the legislation into an upcoming stimulus package.

"Another bill that lawmakers could fold into a future stimulus package is "America's Transportation Infrastructure Act," sponsored by Environment and Public Works Chairman John Barrasso (R-WY), the lobbyist said.

"S. 2302 would provide \$250 million for a new nationwide pilot program to reduce wildlife-vehicle collisions and build wildlife crossings to improve safety for animals and humans.

"In the same vein, many green groups are also looking for more substantial investments in state and local transit agencies, which they see as crucial to bringing down emissions in the transportation sector.

Oil reserve fallout

"Another to-do list pending for Congress: Whether or not to provide funding to enable the Department of Energy to fill up the vacancies in the Strategic Petroleum Reserve.

"DOE had requested some \$3 billion to achieve those aims and help a struggling oil industry caught in the crosswinds of coronavirus and a Russian/Saudi price war, but the funding was left out of the current relief bill.

"Even still, some oil producers are confident DOE will still be able to achieve those aims.

"We are confident that DOE will be able to meet the president's directive to purchase up to \$3 billion in US-produced crude for the SPR and appreciate the Administration's commitment to both diplomatic and free-market solutions to the supply and demand crisis our industry is facing," said Anne Bradbury, CEO of the American Exploration & Production Council.

"Unclear, however, is how DOE can do it without congressional approval. Energy Secretary Dan Brouillette hinted as much in a call with reporters last week. He indicated it was up to Congress how they wanted to fund the purchase, be it through new funding or a reprogramming of existing funds.

"And the lack of funding has the potential to undercut the existing solicitation issued by DOE last week to seek 30 million barrels over the next three months.

"Small to medium size American energy companies and their employees should be provided the same relief being provided to other parts of our economy, and the Secretary calls on Congress to work with the Administration to fund the President's request as soon as possible," said DOE spokeswoman Shaylyn Hynes. "The SPR was a sticking point in negotiations on the third package, and environmental groups are likely to oppose its inclusion in any future stimulus, even if it comes in exchange for boosts to the clean energy industry.

"We would never advocate for the trade-off of one or the other," Pierce said.

"But the Trump administration has also looked to use diplomatic tools to influence Saudi oil decisions. Secretary of State Mike Pompeo said yesterday he talked with the country about the pressing oil market downturn.

"Such efforts may prove more beneficial for the oil industry, who shrugged off the lack of SPR funding in the bill.

"The SPR was set up to protect Americans from disruptions in energy supply during national emergencies," said Frank Macchiarola, American Petroleum Institute senior vice president of policy, economics and regulatory affairs. "We appreciate DOE's effort to be responsible stewards of the SPR, however, we did not advocate for these purchases."

Reporter Timothy Cama contributed.

Other

Renewable Energy Outlook Post Coronavirus from Former Obama Administration Clean Energy Guru

On March 27, Maxine Joselow of <u>E&E News</u> reported, "If lawmakers on Capitol Hill need advice on rescuing the economy from the coronavirus crisis, they might turn to Joe Aldy.

"Aldy, 48, served as special assistant to President Obama for energy and environment at the height of the Great Recession.

"In that role, he took the lead on crafting the clean energy provisions in the American Recovery and Reinvestment Act of 2009, the massive stimulus package that put \$787 billion into the pockets of American families and small businesses.

"The experience wasn't easy. But it provided some important lessons that lawmakers could heed as they look to address the financial fallout of the COVID-19 pandemic.

"In particular, it offered some insights for Democrats looking to include climate and clean energy provisions in future aid packages.

"Once we have the virus under control and people feel safe returning to work, it will be time to think about doing two things at once: stimulating the economy and delivering really important, long-term investments in clean energy," Aldy said in a recent interview. "A Kentucky native and father of two, Aldy is a professor at Harvard University's John F. Kennedy School of Government and a research fellow at the National Bureau of Economic Research, among other roles.

"He recently spoke on the phone with E&E News from his home in the Boston suburbs about his advice for lawmakers, his transition to online teaching and how he thinks Obama would have handled the coronavirus crisis.

What was it like serving as special assistant to President Obama for energy and environment?

"It was inspiring working for President Obama. I started working for him during the presidential transition and in the context of the Great Recession. So we were working feverishly to come up with ideas on how to stimulate the economy. And it seemed like every time we came up with a new batch of ideas, the economic data got worse, and we had to think about going bigger and bolder.

"But during our meetings with the president-elect, it was inspiring to hear him speak. He really recognized the seriousness of the problem and the need to reorient our priorities to help those hurt most by the recession.

You worked on the clean energy provisions in the American Recovery and Reinvestment Act of 2009. What was that like?

"I was the only economist on the presidential transition team's energy and environment working group, and the vast majority of my time was spent focusing on the stimulus. So I was in charge of working with congressional staff on the various proposals that comprised the clean energy package, which was about \$90 billion of the Recovery Act.

"President Obama saw clean energy as one of three areas of strategic investment in the Recovery Act. He really wanted to make sure that as we worked to rebuild the economy, we were doing everything possible to lay the foundation for a cleaner, lower-carbon economy going forward.

After Obama was inaugurated, what did you work on in the White House?

"I worked in both the Office of Energy and Climate Change and the National Economic Council. So I coordinated energy and environmental policy on a lot of different subjects, including implementation of the Recovery Act, clean car standards and international climate negotiations.

It sounds like you had your hands full.

"Yes, it kept me off the streets and out of trouble. [Laughs]

Congress is currently working to pass aid packages amid the coronavirus crisis. What do you make of some Democrats' failed push to include climate provisions in the third aid package, including clean energy tax credits and carbon emissions requirements for airlines?

"I think it made sense for Democrats to push for that. In general, it makes sense to take advantage of must-pass legislative vehicles. This is something that people who engage with members of Congress and the crafting of legislation have been doing since the dawn of the republic.

Do you have any advice for those Democrats, based on your experience with the Recovery Act?

"One thing we learned from the implementation of the Recovery Act is that the clean energy investment took longer to roll out than things that were more immediate. So right now, we're still focused on providing immediate relief. We're still focused on providing checks or direct deposits to families across the country in a matter of weeks.

"But once we have the virus under control and people feel safe returning to work, it will be time to think about doing two things at once: stimulating the economy and delivering really important, long-term investments in clean energy.

Republicans accused Democrats of trying to incorporate elements of the Green New Deal into the third aid package. What do you make of the GOP criticism?

"Well, I would say the last few months have not been the best few months for American government in the history of the republic. It's frustrating. And it's not obvious to me that we can get the parties to come together on this in the next six months or so, when we consider the mix of both the coronavirus crisis and a campaign season.

"I will also say that when we were working on the Recovery Act, it helped that we had a president who had been unambiguous in his campaign about advancing a climate change agenda. And we were working with a House and a Senate that were of the same party as the president. So we could come to agreement on this fairly quickly. That's obviously more challenging now, given the disconnect between [President Trump] and [Speaker Nancy Pelosi (D-Calif.)] when it comes to issues like climate and clean energy.

How do you think Trump has handled the coronavirus crisis? How does his response compare to Obama's handling of the Great Recession?

"The difference is night and day. It's truly stunning to me that the first two months of the Trump White House's response to the pandemic were characterized by a disregard for evidence and experts and a hope that this would just go away. Even once we started to learn about the problem from other countries, we weren't doing the basics on testing and surveillance. So instead of having to shut down the economy, we could have been much more targeted and effective at containing the spread of the virus.

"There is no doubt in my mind that President Obama would have taken a very different, much more targeted approach. He would have demonstrated real leadership in recognizing that as the leader of our country, you take responsibility and you help take care of the American people when we're suffering such a major shock like this.

You currently teach at Harvard's Kennedy School. Have your classes moved online due to the pandemic?

"Yes, I now teach via Zoom. I would say I'm still moving up the learning curve with online teaching. [Laughs]

What are your hobbies? What activities do you do for fun, assuming you can still do them during the COVID-19 pandemic?

"I love taking my two boys hiking. Unfortunately, the Massachusetts Audubon has shut down our favorite place that's just five minutes from our house. I also like to cook, and I'm still able to do that some. But sometimes when I try something new, I realize I don't have the right thing in the pantry. And it's not quite as easy to just run out and pick that missing ingredient up now."

This interview has been edited and condensed for clarity.