



Transcript of CleanLaw Episode 12: Joe Goffman and Janet McCabe on MATS rollbacks, February 2019

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Robin Just: Welcome to this podcast from the Environmental and Energy Law Program at Harvard Law School. Today Joe Goffman, our executive director, will be talking with Janet McCabe, who was EPA's acting assistant administrator for the Office of Air and Radiation between 2013 and 2017. And principal deputy assistant administrator prior to that. During that time, Joe was Janet's associate assistant administrator for climate and senior counsel. Janet is currently assistant director for policy and implementation at Indiana University's Environmental Resilience Institute and professor at the McKinney School of Law. Janet and Joe will be discussing the proposed rollback of the Mercury and Air Toxics Standards, and the dangerous precedent it could set for other environmental and public health rules. We hope you enjoy the podcast

Joe Goffman: Hi Janet.

Janet McCabe: Hi Joe.

Joe: Thank you very much for agreeing to a second appearance on the CleanLaw podcast. This time we have you here in Cambridge, Massachusetts as opposed to just on the phone the way you were last time. And what we're going to talk about is the Mercury and Air Toxics Standards Supplemental Appropriate and Necessary Finding. Which the administration at the end of last year proposed to rescind. And you and I have each written about this in the last month or so, so we can trade points.

Joe: About a week or so ago, you published an article in The Jurist in which among other things you recounted the history of the appropriate and necessary finding and the Mercury and Air Toxics Standards. And it probably makes sense to start off by doing that.

Janet: Sure, sure. Well first of all Joe, thank you for having me back here and it's nice to be here in person. I really appreciate how your center and others are continuing to bring attention to these issues because they're so very important.

Janet: The other thing I'll just mention by way of disclosure, you mentioned that we've written recently about it. Of course, we also wrote about it when we were at EPA. So everybody should know that we were very involved working with the amazing EPA career staff and our leadership, Gina McCarthy and Lisa Jackson on



putting this rule together. Which was really one of the shining stars of the first Obama term in terms of health protection.

Joe: But of course, you and I are analyzing this now in a completely disinterested way. We're the two most objective people you could possibly find to talk about an Obama administration Clean Air Act rule. Right?

Janet: It's as if we were never there.

Joe: Yeah, exactly.

Janet: Exactly.

Joe: Well as far as the current administration is concerned, it is as if we were never there.

Janet: Good point. So I put this piece together for Jurist because I thought it was important for people to have in one fairly short, straightforward, and not overly wonky article, a little bit of the background of why this is so important. Because right now, something called a proposed revision to the supplementary appropriate and necessary finding for the Mercury and Air Toxics Standards is enough to put most people to sleep and doesn't sound like it could be all that important.

Janet: But what I lay out in the article is the fact that number one, mercury is one of the most toxic chemicals around. People are exposed to it. Babies are exposed to it. Elderly people are exposed to it. Fetuses are exposed to it. And it can cause significant health impacts that can last an entire lifetime.

Janet: It's a naturally occurring chemical, metal. It's also emitted by a number of industrial activities in this country. And as we arrived at EPA in the 1990s, it was the predominant emitter of mercury from industry in the United States. In part because other significant emitters like incineration had been controlled through rules by EPA.

Janet: So we were faced with a long regulatory history. Also a pretty specific and particular statutory scheme that we needed to follow which required the agency before they would go forward with a rule to regulate toxics from power plants. To look at whether it was needed. And the reason for that make sense. Utilities have been heavily regulated under the Clean Air Act for many years. So Congress's view was, "Well, let's make sure that these other rules that have been put in place," for example, the Acid Rain Program Title IV, maybe they've taken care of the mercury. So let's make sure we look at that.



- Janet: So an appropriate necessary finding had been done during the Clinton administration, which found yes indeed, there was good cause to go forward. That was rescinded in 2005, I think it was. Around about then. And a rule was put out to not regulate mercury directly from power plants plant by plant, but to put in place a trading program that in the view of many was very generous in terms of the allowed amount of mercury that could still be admitted. And in the eyes of many others was inconsistent with the statutory scheme for mercury.
- Janet: So we said about re-looking at the science and the economics of mercury coming from these facilities, how much it was affecting public health, how much it would cost to address it. So in 2011, administrator Jackson signed a final Mercury and Air Toxics Standards that included this necessary legal finding that it was inappropriate and unnecessary to do so. So let me take a break and let you speak for a moment.
- Joe: I'm going to jump in because I want to go over some ground that sort of borders on a personal war story. In fact, the entire section 112, which is where the air toxics rule making requirements can be found, was one of the most controversial parts of the Clean Air Act amendments of 1990. Because it required the EPA to look at a list of 189 specific air toxics and go sector by sector across industries. Cement, pulp and paper mills, incinerators, medical waste incinerators.
- Janet: Dry cleaners.
- Joe: Dry cleaners. And where those sectors emitted any one or several of the listed air toxics to then determine whether or not anyone was using technologies that could scrub those emissions out of the smoke stack so to speak, or prevent them from being admitted.
- Joe: And the agency then proceeded to do that over the ensuing say 20 or so years since. The power sector was expected to be listed by the EPA is a sector that a had significant levels of air toxic emissions including the non-limited to mercury. And to use an expression, I think there's a song about this in the musical Hamilton that's entitled in The Room Where it Happened. Well there was a room where it happened that Congress added a specific provision that reflected what you said. Congress viewed the acid rain program, which was also part of the 1990 Clean Air Act amendments, as being a very significant emission reduction program. Congress expected or at least the utility industry argued that that program would result in the installation of a lot of air pollution control technology. And the industry argued that inevitably, the technology required to remove acid rain pollution from smokestacks would also catch mercury and other air toxics emissions.



Joe: So Congress agreed with this argument. And in effect, or at least this is what the people in the room, and I might as well say that I was there. I was in the room where it happened. The people in the room writing the language of section 112(n) 1A thought that what they were doing was putting into the statute the industry argument, which was that there was a good chance that the acid rain provisions and other provisions of the 1990 amendments would result in the installation of technology that would take care of the Mercury and Air Toxics problem specifically for power plants. EPA was to investigate in effect to see what happened after that technology was installed. And if need be, either conclude that the mercury and the other air toxics were gone along with the acid rain pollutants. Or if they weren't gone, then to treat the power sector just like any other sector covered by section 112. That's what we thought we were doing. And that means that what we thought we were doing is writing provisions where the result would be one way or the other, mercury from power plants would be gone. There was no third option as far as the individuals wielding the pens back in 1990 anticipated. Which was that there'd be no control or no addressing of Mercury and Air Toxics emissions from power plants.

Janet: Can I put an asterisk on something you said which is very interesting? And I think we will come back to later in this conversation. Because you have just illustrated in that description the oh-so-sensible approach that this appropriate and necessary finding and several other forays that this administration has made into how to evaluate costs and benefits. They're completely belied by the story that you've just told, which is control technology on industry can often control multiple pollutants. And in fact, that's what industry wants. That's how they proceed. And that's how they think about planning.

Janet: And we will talk later about this document, the supplemental appropriate and necessary finding saying, "No, no, we can only look at mercury reductions. We cannot look at all these other public health reductions that are going to happen as a result of this." And it is exactly opposite of where this came from and how industry operates.

Joe: Right. And not to take the digression too far, and this is actually something I'm writing a paper on right now. Which is this administration seems to have a penchant for coming up with sometimes clumsy, sometimes elegant readings of statutory language that takes it away from any obligation or necessity to look at what's actually happening in the real world.

Janet: So that really is a nice introduction to a couple of key points that I think people should be aware of as they think about this proposal, which is available for public comment. I believe there's a deadline now, because-

Joe: I think it was published about a week or so ago.



Janet: Yeah. And it's a 60 day comment period, I believe. So everybody who's listening and all your friends and neighbors will have the opportunity to write in with your views about this in short sentences and not very much, or in long involved analysis. And we certainly hope that you do make your views known to EPA because they matter.

Janet: But a couple of things. First, a key element of this is that EPA is re-looking at the appropriate and necessary finding. They're re-looking at the cost and benefit analyses that EPA did during the Obama administration. Not once, but twice.

Janet: So in the original 2011 rule, as with all major rules, we included a regulatory impact assessment, which included an analysis of the costs and the benefits. And we concluded based on information available to us that the benefits in terms of public health improvements, health costs avoided greatly outweighed the not insignificant cost of control to the industry. And we revisited that in 2015 at the direction of the Supreme Court in the Michigan case, which Joe, I assume you will talk about a little bit more. And we looked at it from different angles, which is a sensible thing to do. And put it out for public comment. It was very transparent, and concluded the same thing.

Janet: This administration is not taking a look at what's happening in the real world now. They're going back and using that old information that we used and making a completely different conclusion because they are saying they are not permitted to consider any health benefits other than those directly resulting from reductions in mercury. And as Joe mentioned, when you control for mercury, you also control for particulate matter. Which has significant health impacts but also is very well studied. There's a lot more science out there on the health benefits of reducing particulate matter. So it's easier to quantify the benefits.

Janet: Mercury as I said, has very significant health impacts. But there's less science out there. Although notably, there's a little bit more science on that than there was when we did our rule. That suggests it is easier to quantify these health benefits.

Janet: So this is when people hear co-benefits. This is what we're talking about is can EPA in doing its rules, consider all of the health benefits that come with a particular rule? Or are they constrained to only consider the health benefits associated with the targeted pollutant?

Joe: Right. Well that proposal makes by and large a pretty elegant or sophisticated argument to answer that last question. Can you only consider the benefits of reducing the pollutants that are listed in the section 112. In particular mercury, acid gases, and a couple of other toxic air pollutants.



Joe: The agency in its proposal argues that because we're only talking about using section 112 which addresses only this specified list of pollutants, we can only look, we the agency can look only at the benefits of those pollutants. And according to the now outdated analysis of using information that was available in 2010 and 2011, the costs of reducing these pollutants is high. And the benefits to the extent you can translate them into dollars is low. Then the benefit cost analysis flunks the test. And as far as the agency is concerned, A, that's all you have to look at. Because the statute is only asking whether the agency can determine that it's appropriate and necessary.

Joe: Now let's unpack that a little bit. The administration I think has at least three problems. One is it's using really out of date information. A group of research scientists, including a colleague of ours here at Harvard University, Kathy Fallon Lambert, put out a very pithy literature review showing that the science of mercury shows that the damages delivered to public health and the environment are much greater. And therefore the value of reducing mercury is much greater than anybody, including the EPA knew back in 2010 and 2011. That's reflected nowhere in the proposal.

Joe: Meanwhile, the entire utility industry. The investor owned utilities, the co-ops, the publicly owned municipal utilities delivered information to the EPA this past summer. Saying that in total, the industry had spent much, much less than back in 2011 the EPA projected they would spend.

Joe: So we now have an agency, indeed a world that is much better information about both the benefits and the costs. And that information is nowhere to be seen in this proposal. Right. I think that even the common sense meaning of the term arbitrary and capricious would apply to that.

Joe: Second, when the EPA issued the Mercury and Air Toxics Standards, which included an appropriate and necessary finding, the rule was challenged including the finding. The DC Circuit upheld everything. By implication, the Supreme Court upheld everything except whether or not the agency had done the appropriate necessary finding analysis correctly. And the Supreme Court in an opinion written by Justice Scalia said no, the agency hadn't done it correctly because we hadn't considered costs. And indeed in that opinion, in Justice Scalia's opinion, the court said that the agency should be comparing costs and benefits.

Joe: The second problem with this proposal is the EPA treats that opinion as saying only that. In fact, what Justice Scalia said is the term appropriate and necessary is not the same thing as considering costs as used elsewhere in the Clean Air Act. And I think it's right there in the opinion that the agency should consider not just the comparison of costs and benefits, but any number of other relevant factors.



Joe: And this is where you get back to what lawyers refer to as the statutory scheme. And we've talked about the statutory scheme. The statutory scheme was Congress determined that these 189 pollutants, no matter where they were admitted, represented a public health problem that EPA had to address. In other words, Congress made that decision in 1990. All Congress was saying is to the extent that power plants are heavily regulated by a whole bunch of other provisions in the Clean Air Act, the EPA should wait and see, wait to find out whether or not these other provisions have done the job right. If they have fine, no need to do a Mercury and Air Toxics Standards. If they haven't, then we're going to have to use section 112. And that I would say is the chief among the 'other relevant factors' that Justice Scalia if he was not referring to them explicitly, certainly was creating room for.

Joe: And what's interesting is that the court was not unanimous. Justice Kagan wrote a dissent. And in her dissent she very matter-of-factly laid out what I was just saying. That in effect, the way the agency has approached this in this proposal is to say either we get mercury emissions reduced by the technology put in place because of other provisions. Or if not, we get mercury reduced under section 112. Or we have a third option where we can find that it's not appropriate and necessary, right to reduce mercury from power plants at all. Which is not what Congress intended as Justice Kagan pointed out. And is absurd since other sectors which contribute lower levels of emissions of mercury have already been regulated. Why would you leave the highest emitting sector out of the scheme altogether?

Janet: Well and in particular when there are controlled technologies that can reduce mercury. That's an important part of this. You in your history of how 112 came about in that room where it happened, you correctly described section 112 as not all mercury must be reduced at any cost by any means. It is a technology based rule. And in fact, it was a response to the earlier air toxics provisions in the Clean Air Act, which were risk based and turned out to be extremely difficult for EPA to implement. They were not protecting public health sufficiently. So Congress said, "Okay, we're not going to try to do that anymore. We're going to tell EPA, 'Look at these industries that are emitting these particular pollutants and look at what the best technology is that it's out there. And if there's something good, then everybody should be expected to use that technology.'"

Janet: So the appropriate and necessary was the predicate to not requiring utilities to eliminate every single bit of mercury, no matter the cost or the feasibility of it. But look, there are approaches that you can use. And indeed the industry went forward. And in the space of three or four years actually was able to comply with the standard, which is pretty awesome success I think by anybody's measure. And mercury emissions have gone down substantially in this country. That means



that lakes are cleaner and fish are going to be recovering from mercury exposure. And that's an incredibly successful program.

Joe: Now in the piece you wrote for The Jurist, you took a look at this whole question of excluding so-called co-benefits from the calculation. To be sure, as I mentioned, the agency has an argument for that. But the argument is based on a legal interpretation that as I read the proposal doesn't say it's the only interpretation that the agency can apply. So you should say a little bit more about what your thought is about considering co-benefits from a broader policy.

Janet: I think we should, because I think that that is key. To me, I read this proposal as really in some ways all about that. This is a vehicle for them to enact an approach that that does not allow the agency to look at co-benefits. Which they have signaled in prior rule proposals like the Affordable Clean Energy proposal that would repeal the Clean Power Plan. And even in a separate proposal that just looks at their approach to cost benefit.

Janet: So they do have an argument. And agencies are permitted to reconsider previous interpretations. They're making it a legal argument entirely, right? They're not basing it on, "The facts have changed or the world has changed." It's a legal argument.

Janet: They're going against decades of guidance from the Office of Management and Budget that directs agencies in their cost benefit analysis to look at direct and indirect benefits. So they have to contend with that.

Janet: They're going against what I mentioned before, which is the industry's strategic preference to control more than one pollutant at a time. Especially utilities which continue to contribute to poor air quality in local communities. So through the National Ambient Air Quality program and the interstate pollution programs will likely be expected to reduce particulate matter, SO₂ and such in the future. So why not get it now while they're complying with another rule?

Janet: It goes against the sort of common sense approach of if I do something, the example that I use in the article I find compelling. Which is if I quit smoking because I want to reduce my chance of getting lung cancer. I'm also going to benefit in many other ways. My health will. My blood pressure will go down and I'll reduce my risk of heart disease, and my breath will smell better. I'll have more energy to go out and exercise. Not to mention I will reduce the risk to my children and everybody who's exposed to my second hand smoke.

Janet: To me as a non-economist, clearly I am not an economist. It just seems crazy that those real live benefits would be discounted. Because they're happening in the real world. And if you wanted to achieve those benefits, you would have to pay



for them. So here they're already being paid for. So that doesn't make any sense. And my conversations with economists have supported the notion that it is illogical to not consider monetary, you can quantify these additional co-benefits in considering whether a particular policy is appropriate to move forward on.

Janet: So I don't know whether this administration will be able to make a tight enough and compelling enough case that this is either the only legal interpretation that's correct. Or it is correct enough for them to be able to do this if they want. If it's couched that way, well the next people can come along and undo it again, I suppose.

Janet: But I do worry that if it happens in this rule, it is opening the door for it to happen in every air quality rule, every EPA rule. And even to other agencies that might look at this and with a deregulatory, minimal regulatory agenda, see this as an approach that they'll want to do too. And that could have extremely far reaching impacts.

Joe: Well, you've actually answered the question that one of your comments begged. Which is if the agency doesn't take the position and it doesn't really take this position in the proposal, that it must exclude any consideration of co-benefits because there's no other interpretation of the statute. Then the question that's begged is why would they choose this interpretation?

Joe: And if you look at the proposal, you see that they acknowledge that the long-standing practice of the executive branch led by a series of OMB directives going back many administrations, is to take account not only of the full range of reasonably identifiable costs to a regulatory action. But also the full range of reasonably foreseeable benefits to society.

Joe: They acknowledge that that's something that is appropriate to do. They acknowledge that one of the benefits of doing that is that the public is informed. But then they put themselves in this let's just say awkward position of telling the public, accepting that they'll be telling the public that there's a range of benefits for writing rules to reduce air toxics and mercury. But they have chosen a legal interpretation, the result of which is well we can't take those into account. Why would you make that your position that you're offering to the public, that there's lots of goods we can do here, but somehow we can't really accomplish all those goods? Because we can't find that it's appropriate and necessary to regulate pollution from power plants if the only way to justify it is through so-called co-benefits.

Joe: You offer the answer. Because I think even though in this case they're making an argument that would seem to apply solely to this one particular provision in the Clean Air Act. This is part of a series, at least in my observation that goes all the



way back to October of 2017. When in proposing to repeal the Clean Power Plan, they included a set of opening forays against either the consideration of co-benefits or the characterization and calculation of co-benefits. They were working to make the benefits package of producing CO2 from power plants as small as possible.

Joe: And then as you said, in the summer of 2018, put out an advanced notice of proposed rulemaking that was soliciting comments on how they generally deal with methodologies for costs and benefits calculation. And invited comments on ways of limiting the consideration of benefits, including the exclusion of co-benefits. And a lot of people read their so-called secret science proposal as targeting specifically those studies that fully aluminate the range of benefits you get from reducing air pollution.

Joe: So it's very convenient that they have a specific narrow legal argument that would point away from this being a more general approach. But that argument or that conclusion is belied by the fact that this is the third or fourth time they've taken a run at benefits.

Janet: Yeah, I mean I think if you're trying to figure out what's going on here and why, there are a couple of different paths. One is that this administration has been very clear that they are inclined to undo or reconsider anything that the prior administration did related to coal. So this is one in that series, along with a number of other rules.

Joe: Let's say a more nuanced way of asking the question, why are they doing this? When even they admit that they have to tell the public the full story about the benefits of regulating Mercury and Air Toxics, and then somehow pivot around and tell the same public, "But don't worry, we can't do that. Or too bad, we can't take those into consideration."

Joe: There's a second form of the question why are they doing this? As we discussed one way, one thing that makes you ask the question, "Why are they doing this?" When they are contrasting a full blown cost benefit analysis and the importance of informing the public of the range of benefits that can occur from reducing pollution. And then turning around and saying in effect, "Too bad. However true that is, we don't have the power to actually take account of those benefits."

Joe: But there's an even more obvious way that that question is begged if you consider the fact that this program has been fully implemented. By way of reporting to the agency that the entire utility sector or power sector had achieved the results required by the Mercury and Air Toxics Standards at a much lower cost than projected. That coalition of utilities was essentially asking the administration not to do this at all.



Janet: Yeah. Well, right. And I'm sorry to interrupt you Joe, but there is an important point that I think fits into all of this. Which is what we heard from the administration when this proposal came out. And people said, "Oh dear," in spite of the fact that this program is good and has been implemented, you're trying to roll it back. Was, "No, no, we're not actually. Our proposal has nothing to do with the standards themselves. All we're doing is revisiting this first piece." The problem is of course that that's really transparently false, right? So they are revisiting the legal underpinnings. EPA was not permitted to go forward and regulate these facilities under section 112 unless they made an appropriate and necessary finding. They're proposing to say it is not now, and I guess it wouldn't have been back in 2011 either appropriate and necessary to regulate these.

Janet: So if they finalize that and then go about their merry way, it is inconceivable to me that somebody will not come forward and say, "Hey EPA, you no longer have the legal authority to have this rule in place. So you need to start a rulemaking to withdraw the Mercury and Air Toxics Standards." So it is disingenuous it seems to me for them to rely on the fact that they are not actually proposing to rescind the standards now.

Joe: The proposal asserts that all they're doing is withdrawing this. But the statutory construct is pretty tight. Again, the proposal itself actually lays out the fact that the path to regulating mercury and air toxics from power plants involves a series of steps. And the step of determining that it's appropriate and necessary to regulate mercury and air toxics is a necessary step. So it's almost impossible regardless of what we think their intentions are. And the proposal shows this, not to lay out the argument for why not only do these standards not have a foundation. But the standards can't proceed, so to speak in the absence of the foundation. And again, it's another form of begging the question. Which is you've told the public the real world consequences of these rules. You're doing, turning around and saying, "Sorry, we can't actually implement this regardless of what we know about the benefits."

Joe: The industry has already complied with this. The industry has testified to the fact that the compliance has a much lower price tag than originally thought. And the industry has asked them not to do this at all. And I think you've already given the answer to the question, "Well, why are they doing this?" Because this seems to be part of a multi-pronged campaign to attack the different forms of the proposition that reducing air pollution has broad public health benefits.

Joe: And, you've identified Janet, that there's a real risk that there's going to be a cascade of litigation following this. And they seem to be willing to take that risk. Indeed, the proposal invites comment on whether they have to rescind the standards if they resend the appropriate and necessary findings. And that goes



to a third point you made about this whole effort in your Jurist piece about the impact on just industry being able to go about its business.

Janet: Right. Right. Yeah. Right. So I've been in the business of working in state and then federal government on air pollution for many years. And probably the most consistent and emphatic message that industry would always give is give us as much certainty as possible. Don't change the rules every two minutes. Tell us what to do and we'll do it, and we'll plan for it. But we need time to plan for it. And the utility industry in particular needs a long time to plan for things.

Janet: And the utilities that have gone ahead and followed the law and complied with MATS. If they're in a system where they have to go see great recovery, they're doing that. They've spent money and they go and ask the utility regulatory commission to add that into their rate so they can recover those costs. And the consumers pay for that.

Janet: I really wonder what will happen, what will ensue. If the standards are revoked, then they are no longer a federally required requirement. And you may see groups popping up in states like my home state, going back to our Indiana Utility Regulatory Commission and saying, "Hey, wait a minute. The rate payer shouldn't be paying for this."

Janet: So that's a mess and really not an appropriate way to govern. And every policy issue that I've worked on, including all of them during the Obama administration, which are now being held up as just such extreme examples of overreach. All of those were so carefully discussed with everybody, and compromises made on timing, on the level of control, on how much it would cost. And to see industry being whipsawed. And of course, if a more public health oriented administration comes in next, there will be an effort to undo all of these things. And that's just not a good way to govern.

Joe: Yeah, so I think that one important takeaway is that despite the fact that they are proposing not to change the standards. The proposal to remove this finding can't be unseen. And even if we stepped back from predicting whether ultimately the standards would be removed, I think we have a high degree of confidence that if this proposal was finalized as proposed, there will at least be litigation. And not just litigation against the removal of the finding, but taking it as a given that the finding has been removed a whole fresh set of litigation against the standards themselves.

Joe: Without knowing more, it seems to me that that is exactly the kind of uncertainty that you're introducing to not only the industry, but to the various other regulatory bodies that interact with the industry and have to make decisions directly or indirectly related to this.



Janet: And think of all the resources that will be spent on all that litigation. For a rule that's already in place that the industry themselves is saying, "We're good. We're good. Let's move on and let us plan for the clean energy economy that we all want because of climate change."

Janet: Maybe as we get close to wrapping up here, I could say something nice about your center in connection with what's being done here. Because of course we've been talking about the specific rule. We've also been talking about the systemic change that this proposal is offering for a way of looking at costs and benefits writ large across a lot of regulations. And of course that's one attempt at undermining the pillars and principles of decision making and policy making that EPA has used through Democratic and Republican administrations for years. And I know your center is very committed to watching not just the surface, here's the rules themselves that are being reconsidered. But what is it doing to the underpinnings of how we do environmental and public health protection in this country? So this I think is not even lightly hidden, slightly hidden attempt to change one of those underlying principles.

Janet: So thanks very much for providing this opportunity, Joe. It's always great to talk to you about these things.

Joe: Yeah. Same. Same here. Really appreciate it, Janet. Thank you.

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