



**Ontario Power Generation Inc.**

**Application for payment amounts for the period from  
January 1, 2022 to December 31, 2026**

**DECISION ON MOTIONS  
May 27, 2021**

Ontario Power Generation Inc. (OPG) filed an application dated December 31, 2020, with the Ontario Energy Board (OEB) under section 78.1 of the *Ontario Energy Board Act, 1998*. OPG's application seeks approval for changes in payment amounts for the output of its nuclear generating facilities in each of the five years beginning January 1, 2022 and ending on December 31, 2026. OPG also requested approval to maintain, with no change, the base payment amount it charges for the output of its regulated hydroelectric generating facilities at the payment amount in effect December 31, 2021 for the period from January 1, 2022 to December 31, 2026.

Procedural Order No. 1 scheduled a motions hearing for May 21, 2021 to address any motions relating to interrogatory responses, technical conference responses, or other matters. Environmental Defence Canada Inc. (Environmental Defence), School Energy Coalition (SEC), the Association of Major Power Consumers in Ontario (AMPCO), and OEB staff brought motions.

**Environmental Defence Motion – Matter at Issue**

Environmental Defence sought an order from the OEB requiring OPG to disclose the methodology and / or equation(s) it uses to determine when to operate the pump at its Pump Generating Station (PGS). This stemmed from questions Environmental Defence posed during the Technical Conference to which OPG refused to respond.

At the outset of the motions hearing, OPG indicated that it agreed to provide a response, specific to PGS operation in 2018 and 2019. Environmental Defence confirmed that it was therefore unnecessary to pursue the motion.

**SEC Motions – Matters at Issue**

In its letter indicating its intent to participate in the motions hearing, SEC noted that it would pursue motions regarding:

Matter at Issue	Reference
SEC-8	L-A1-03-SEC-8
SEC-13	L-A2-02-SEC-013
SEC-46	L-C1-01-SEC-046
SEC-154	L-H1-01-SEC-154
OPG 2018-2021 Business Plan	Technical Conference Transcript / Day 1 / p. 117 / Lines 1-4
Economic Protocols for PGS Pumping	Technical Conference Transcript / Day 2 / p. 83
Hydroelectric Costs in 2021	Technical Conference Transcript / Day 2 / p. 167

### SEC-154 and Economic Protocols for PGS Pumping

At the outset of the motions hearing, SEC confirmed that it would not proceed with its motion regarding SEC-154, and that its motion regarding the economic protocols for PGS pumping was no longer necessary as OPG had agreed to provide the information at issue.

### SEC-8, SEC-13, SEC-46, and Hydroelectric Costs in 2021

In SEC-8, SEC sought information from OPG regarding a statement in the proposed OEB Scorecard Management Discussion and Analysis<sup>1</sup> for hydroelectric facilities. The statement pertained to changes in regulated facilities' total generating costs, and OPG asserting "higher fuel costs" for hydroelectric facilities. SEC highlighted that hydroelectric facilities do not have fuel and noted that OPG was likely referring to Gross Revenue Charge. However, OPG refused to provide clarification on the statement of "higher fuel costs" in response to SEC-8. As such, SEC filed a motion on this interrogatory.

SEC submitted that it only sought clarification of the "higher fuel costs" statement and noted that the matter was relevant, in the context of Issue 2.2<sup>2</sup> of the approved Issues List.<sup>3</sup> SEC also stated that it would not be onerous for OPG to provide a response.

<sup>1</sup> Exhibit A1 / Tab 3 / Schedule 2 / Attachment 2 / p. 3.

<sup>2</sup> Issue 2.2 of the approved Issues List states: "Is it appropriate to establish an earnings sharing mechanism or similar type of mechanism for the 2022 to 2026 period?"

<sup>3</sup> On May 20, 2021, in advance of the motions hearing, the OEB issued its Decision on Issues List for this proceeding.

In SEC-13, OPG was asked to provide the forecast net income attributable to OPG's regulated business, separated by hydroelectric and nuclear, for each year between 2020 and 2026. In response to SEC-13, OPG indicated that it does not track or report net income separately. SEC pursued this matter further during the Technical Conference where OPG clarified that it has such information, as it underpins its business plan. However, OPG refused to provide the information in relation to the regulated hydroelectric facilities. SEC filed a motion requesting OPG provide such information.

SEC submitted that it appears OPG has the information and argued that it will provide a better understanding of what hydroelectric costs are and what the profitability of OPG's hydroelectric business will be over the 2022 to 2026 period. SEC also stated that the information is relevant to understanding the difference, potentially, between the profitability of the nuclear business against the hydroelectric business forecast. This would then help the OEB and parties' understanding and arguments for the exploration of the appropriateness of an earnings sharing mechanism (ESM).

In SEC-46 and Technical Conference inquiries, SEC requested that OPG confirm the actual cost of interest on long-term debt applicable to the regulated hydroelectric facilities for the 2022 to 2026 period. SEC asked OPG if the forecast was approximately \$130 million lower than the interest cost embedded in hydroelectric payment amounts to be frozen for that period. OPG refused to provide a response to SEC-46 but provided some commentary on interest costs at the Technical Conference. When asked about its regulated hydroelectric costs in 2021, OPG did not provide a response.

SEC argued that the requested information is relevant based on the scope of the approved Issues List and is not precluded by the specific provisions of O. Reg. 53/05. SEC also noted that the information will allow parties to put evidence to the OEB about potential ratepayer protection mechanisms, such as an ESM.

OPG submitted that the questions posed by SEC were asked in the context of whether or not there should be an adjustment to hydroelectric rates prior to the end of 2021 – which the OEB later decided in its Decision on Issues List was an issue outside the scope of this proceeding – rather than in the context of a potential ESM. OPG further stated that the OEB does not establish ESMs where there is an anticipated variance from a forecast actual and argued that SEC's approach was an unjustifiable departure from the OEB's normal practice. OPG argued that in the normal course, if the OEB believed an applicant's forecast was too high or too low, it would adjust the applicant's revenue requirement.

## ***Findings***

The OEB denies these motions. The OEB will not direct OPG to provide answers to SEC interrogatories 8, 13 and 46 or the Technical Conference question, regarding hydroelectric generation costs and forecast returns. The OEB finds that the evidence on the record is sufficient for parties to evaluate Issues 2.2, 6.1 and 6.2 on the approved Issues List.

### **OPG 2018-2021 Business Plan**

At the Technical Conference, SEC questioned OPG about how it accounted for disallowances ordered by the OEB in its decision on OPG's previous payment amounts application (2017-2021 Payment Amounts Proceeding).<sup>4</sup> OPG noted that it incorporated the disallowances into its 2018-2021 Business Plan, however, refused to provide such business plan when requested by SEC. SEC filed a motion requesting OPG to provide the 2018-2021 Business Plan.

SEC submitted that information in the 2018-2021 Business Plan is relevant to understanding OPG's business planning for the period after the 2017-2021 Payment Amounts Proceeding decision. SEC noted that OPG's 2017 to 2021 nuclear in-service additions are \$314 million higher than approved by the OEB in the 2017-2021 Payment Amounts Proceeding – of which OPG is seeking approval to add the variance to its 2022 opening rate base in this proceeding. SEC argued that as the variance is relevant to this proceeding, and it was the 2018-2021 Business Plan that approved such spending, OPG should provide the requested business plan.

OPG contested the need to provide the 2018-2021 Business Plan. OPG submitted that the 2018-2021 Business Plan was superseded and does not underpin the costs being claimed in the revenue requirement in this proceeding. As such, OPG stated there would be no need for it to file the 2018-2021 Business Plan.

Regarding the relevance of the 2018-2021 Business Plan to opening rate base, OPG stated it was providing the necessary information through answering AMPCO's request to provide updated tables on capital expenditures and in-service additions (i.e., Technical Conference Undertaking Refusals 1 to 4 – discussed further below). By providing the updated tables, OPG stated that there would not be a need for it to provide the 2018-2021 Business Plan. In response, SEC noted that the 2018-2021 Business Plan would not only provide the requested numbers but would also provide a narrative on the requested numbers.

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<sup>4</sup> EB-2016-0152 / Decision and Order / December 28, 2017.

SEC stated that OPG's 2017 and 2018 nuclear benchmarking and performance targets provided on the record of the 2017-2021 Payment Amounts Proceeding had been revised in this proceeding. Through questions at the Technical Conference, OPG noted that such revisions were likely driven by an updated business plan (i.e., the 2018-2021 Business Plan). As such, SEC submitted that the 2018-2021 Business Plan should be provided so it can understand the driver of the change to the benchmarks and performance targets.

OPG disagreed that providing information about what it "thinks" about benchmarking would be helpful.<sup>5</sup> Instead, OPG argued that the OEB is concerned about the ultimate benchmarking performance that is at issue in this proceeding. In response, SEC noted the importance of performance results, but also emphasized that the setting of targets is also an important element.

### ***Findings***

The OEB denies the motion. The OEB will not direct OPG to file its 2018-2021 Business Plan. At the motions hearing, OPG agreed to provide responses to four of AMPCO's motions (Technical Conference Undertaking Refusals 1 to 4) which will provide specific information from the 2018-2021 Business Plan regarding capital expenditures and in-service additions. The OEB finds it premature to request more information, such as the complete 2018-2021 Business Plan, pending the review of these four responses to be filed by OPG.

The OEB expects OPG to file tables in response to AMPCO's motion, providing dollar figures sourced from the 2018-2021 Business Plan. Although parties will not have the additional explanation or rationale that may, or may not, be available in the 2018-2021 Business Plan, parties will be able to compare capital expenditures and in-service additions from OEB approved in the 2017-2021 Payment Amounts Proceeding, the subsequent 2018-2021 Business Plan, and actual expenditures for 2017 to 2021, in order to make submissions.

The OEB has reviewed the 2021-2026 Business Plan which is evidence available in this proceeding, and which supersedes the 2018-2021 Business Plan in question. The OEB has considered the implications of filing the prior 2018-2021 Business Plan as explained by OPG and will not order it to be filed. If the schedule in this proceeding advances to an oral phase, parties may request the approval to pursue this issue further in cross-examination.

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<sup>5</sup> Motions Hearing Transcript / p. 47.

**AMPCO Motions – Matters at Issue**

In its letter indicating its intent to participate in the motions hearing, AMPCO noted that it would pursue motions regarding:

<b>Matter at Issue</b>	<b>Reference</b>
AMPCO-89(c)	L-D2-02-AMPCO-089(c)
AMPCO-100	L-D2-02-AMPCO-100
AMPCO-101	L-D2-02-AMPCO-101
AMPCO-159(c)	L-F2-08-AMPCO-159(c)
Technical Conference Undertaking Refusal 1	Technical Conference Transcript / Day 2 / pp. 58-60
Technical Conference Undertaking Refusal 2	Technical Conference Transcript / Day 2 / pp. 60-61
Technical Conference Undertaking Refusal 3	Technical Conference Transcript / Day 4 / pp. 51-52
Technical Conference Undertaking Refusal 4	

**AMPCO-159(c) and Technical Conference Undertaking Refusals 1 to 4**

At the outset of the motions hearing, AMPCO confirmed that it would not proceed with its motion seeking an answer to AMPCO-159(c), which concerned small modular reactor costs. AMPCO also confirmed that it was unnecessary to proceed with its motions concerning the Technical Conference Undertaking Refusals 1 to 4, as OPG agreed to provide the updated information AMPCO was seeking.

**AMPCO-089(c), AMPCO-100, and AMPCO-101**

In AMPCO-89(c), AMPCO sought information on the experience of the project managers overseeing the Heavy Water (D2O) Storage Project. Specifically, AMPCO was seeking information on the change in project managers over time, their years of experience within OPG, their years of experience as a project manager, and the number of other projects they were managing simultaneously while also overseeing the D2O Storage Project. OPG declined to provide the requested information and stated that detailing the names and experience of project managers would not provide information for determining the prudence of OPG's expenditure on the D2O Storage Project. AMPCO filed a motion for OPG to provide the requested information.

AMPCO stated that its understanding was that the project manager for the D2O Storage Project had accountability to ensure the approved scope of work for the project was delivered on time and on budget. AMPCO argued that having the right project manager with the right level of experience at the outset of a project of such nature is critical to the successful delivery of the project within the approved budget and schedule.

AMPCO referenced the 2018 Auditor General Report, Volume 1, on the Darlington Nuclear Generating Station Refurbishment Project (Auditor General Report) which determined that 18 prerequisite work projects for the refurbishment program, of which the D2O Storage Project was one, was assigned to OPG staff with limited relevant experience. The Auditor General Report also stated that project management and oversight of contractors performing prerequisite work was inadequate. AMPCO submitted that understanding the degree of project manager experience OPG assigned to the project, notably in initial project stages, is reasonable and relevant to understanding if OPG prudently managed the D2O Storage Project. Also, in its submission, AMPCO clarified that it did not seek the specific names of project managers overseeing the D2O Storage Project. Instead, AMPCO stated that it was looking at the change in project management over time.

In response, OPG noted that findings of the Auditor General Report were not focused on individuals as the work was assigned to the Project and Modifications Group. Therefore, as this was monitored by a group, it was ultimately an OPG responsibility to manage the project. OPG also argued that the request was inappropriate since the D2O Storage Project was an OPG responsibility and that singling out particular individuals is unfair and unnecessary. In addition, OPG referenced the significant amount of evidence provided on the record of this proceeding regarding the management of the D2O Storage Project.

The other motion filed by AMPCO encompassed two interrogatories, AMPCO-100 and AMPCO-101, that OPG did not respond to. AMPCO-100 was an interrogatory seeking details regarding the request for proposal (RFP) for engineering services associated with the D2O Storage Project. AMPCO-101 pertained to questions about the second engineering services RFP that was issued in late 2011, but was ultimately cancelled.

In its submission, AMPCO argued that OPG's development of contracting options for the D2O Storage Project is relevant to the determination of prudence in contractor selection and the project overall, given the significant cost and schedule overruns. AMPCO further argued that discovery of who the proponents were, the scope of work, and the mandatory criteria that proponents had to meet in RFPs is reasonable and relevant in consideration of the findings provided in the Auditor General Report.

OPG noted in its response that the Auditor General Report did not express concern about the procurement process that was run by OPG. OPG further argued that AMPCO was concerned with respect to the weighting OPG used in its RFP selection process, of which, AMPCO had already asked questions about the contractor retainer, RFP process, and how OPG selected the contractor.

### ***Findings***

The OEB denies the motion. These motions relate to development phases of the D2O Storage Project which OPG proposes to add to rate base in 2022. OPG argued that a significant amount of information has been filed already with respect to the D2O Storage Project. The OEB finds that information filed by OPG, including the Auditor General Report<sup>6</sup>, in addition to any information provided through cross-examination with respect to these documents, will be sufficient for the OEB to assess prudence of expenditures. The D2O Storage Project was considered in the Auditor General's review and report of OPG's Darlington Refurbishment Program which included project management and contract procurement.

### **OEB Staff Motion – Matter at Issue**

In a letter dated May 14, 2021, OEB staff explained that it intended to seek clarification from the panel at the issues list hearing on May 18, 2021 on what types of revenues fall within the scope of “other revenues” under Issue 11.1 of the draft Issues List, and in particular whether this includes the proceeds from the sale of assets irrespective of whether those assets were included in OPG's rate base. OEB staff clarified that it had “not yet determined what its final submission will be with respect to this issue (assuming it is in scope), and it may or may not ultimately argue that some portion of the proceeds of any sale of the assets should be credited to ratepayers. However, OEB staff is asking that the OEB confirm that this issue falls within the scope of the proceeding and that parties can ask questions and make submissions in this area.” At the issues list hearing, OPG and OEB staff agreed to defer this question to the motions hearing held on May 21, 2021.

At the outset of the motions hearing, OPG advised that it would provide answers to the questions it had initially refused concerning these assets, namely, an interrogatory filed by the Society of United Professionals and a refusal from the Technical Conference, although it reserved its right to argue in its final submissions that the disposition of any sales of the assets should remain with the shareholder. The only narrow question that was left unresolved was whether the scope of this proceeding would include the

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<sup>6</sup> The Auditor General Report was provided as an attachment in response to SEC-86.



treatment of the disposition of the asset sale even if the sale occurred between now and the end of 2021, that is, before the proposed commencement of the next five-year rate period.

Without referring to the particular assets, as some of the evidence concerning the potential sale is confidential, OEB staff argued that the panel should make it clear that even if the sale were to occur this year, the disposition of the proceeds are in scope. OEB staff expressed the concern that, unless this were done in advance of the sale, there might be a rate retroactivity issue. It would suffice, OEB staff suggested, for the panel to signal now to all parties that the proceeds were at issue (and therefore “encumbered”, to use the term found in the rate retroactivity case law); a formal deferral and variance account (DVA) was not required.

While acknowledging that it is normally not appropriate to revisit approved rates in the middle of a rate term, OEB staff suggested that it can be done “where significant new information arises”, and in this case, it is simply unknown whether the proceeds of the sale could be significant.

SEC supported OEB staff.

OPG responded that, just as the panel refused to reopen the OEB-approved hydroelectric payment amount for 2021 in its recent Decision on Issues List, it should refuse to reopen the approved final payment amounts in the event of a sale of these assets. It added that doing so could set a “dangerous precedent” that could allow parties in other cases to ask the OEB to “sidestep” the rate orders in effect. OPG acknowledged that the OEB could address in this proceeding the sale of assets that may occur during the five-year term that is proposed to begin on January 1, 2022.

### ***Findings***

The OEB was asked to clarify the scope of the proceeding related to the potential net proceeds of sale related to an asset that is not listed in O. Reg. 53/05 as a prescribed asset.

The 2017-2021 Payment Amounts Proceeding decision and the nuclear and hydroelectric payment amount orders for 2021 were issued on a final basis. Consistent with its Decision on Issues List in this proceeding, the OEB will not review or adjust payment amounts in 2021.

The OEB finds that a potential sale in the 2022 to 2026 test period is a relevant question and within the scope of this proceeding. The OEB approved the Issues List without the

benefit of the information provided at the motions hearing. Based on the wording of approved Issue 11.1, the evidence on the record to date, and submissions of OEB staff, SEC and OPG, the OEB finds it necessary to add an issue, updating the approved Issues List to enable parties to consider the question.

The OEB finds it important to consider new information, whether the information is a known or an uncertain future event, as part of its assessment of OPG's proposed nuclear Custom IR and the DVAs applicable to nuclear and hydroelectric.

The OEB notes that the asset is not listed in O. Reg. 53/05 as a prescribed asset, yet provides services to OPG's regulated businesses. The asset is not in OPG's rate base, instead OPG recovers the cost of this asset through asset service fees that form part of its approved payment amounts.

With this information on the record, the OEB finds it necessary to turn its mind to the issue of the appropriate ratemaking treatment for this potential sale transaction.

The OEB is adding Issue 13.5 under Deferral and Variance Accounts:

"Should the net sale proceeds of an unprescribed asset be recorded in a deferral and variance account?"

#### **THE ONTARIO ENERGY BOARD THEREFORE ORDERS THAT:**

1. SEC's motions for OPG to provide its 2018-2021 Business Plan and information on hydroelectric costs (SEC-8, SEC-13, SEC-46, and hydroelectric costs in 2021) are denied.
2. AMPCO's motions for information regarding the D2O Storage Project (AMPCO-089(c), AMPCO-100 and AMPCO-101) are denied.
3. OEB staff's motion regarding the proceeds from any asset sale in 2021 being addressed in this proceeding is denied.
4. The approved Issues List is attached to this Decision as Schedule A. This replaces the issues list approved in the May 20, 2021 Decision on Issues List. The only change is the addition of Issue 13.5.

Email: [registrar@oeb.ca](mailto:registrar@oeb.ca)

Tel: 1-877-632-2727 (Toll free)

**DATED** at Toronto, **May 27, 2021**

**ONTARIO ENERGY BOARD**

*Original Signed By*

Christine E. Long  
Registrar

**SCHEDULE A**  
**APPROVED ISSUES LIST**  
**ONTARIO POWER GENERATION INC.**  
**EB-2020-0290**  
**MAY 27, 2021**

**ONTARIO POWER GENERATION INC.**  
**2022-2026 PAYMENT AMOUNTS**  
**EB-2020-0290**  
**ISSUES LIST – May 27, 2021**

**1. GENERAL**

- 1.1 Has OPG responded appropriately to all relevant OEB directions from previous proceedings?
- 1.2 How could OPG further improve its customer engagement process?

**2. RATE FRAMEWORK**

- 2.1 Is OPG's approach to incentive rate-setting for establishing the nuclear payment amounts appropriate?
- 2.2 Is it appropriate to establish an earnings sharing mechanism or similar type of mechanism for the 2022 to 2026 period?

**3. NUCLEAR BENCHMARKING**

- 3.1 Is the nuclear benchmarking methodology reasonable? Are the benchmarking results and targets flowing from OPG's nuclear benchmarking reasonable?

**4. IMPACT OF COVID-19 PANDEMIC**

- 4.1 Is OPG's proposed ratemaking treatment of the COVID-19 pandemic-related impacts appropriate?

**5. RATE BASE**

- 5.1 Are the amounts proposed for nuclear rate base appropriate?

**6. CAPITAL STRUCTURE AND COST OF CAPITAL**

- 6.1 Are OPG's proposed capital structure and rate of return on equity appropriate?

- 6.2 Are OPG's proposed costs for the long-term and short-term debt components of its capital structure appropriate?

## **7. CAPITAL PROJECTS**

- 7.1 Do the costs associated with the nuclear projects that are subject to section 6(2)4 of O. Reg. 53/05 and proposed for recovery meet the requirements of that section?
- 7.2 Are the proposed nuclear capital expenditures and/or financial commitments (excluding those for the Darlington Refurbishment Program) reasonable?
- 7.3 Are the proposed nuclear capital expenditures and/or financial commitments for the Darlington Refurbishment Program reasonable?
- 7.4 Are the proposed test period in-service additions for nuclear projects (excluding those for the Darlington Refurbishment Program) appropriate?
- 7.5 Are the proposed test period in-service additions for the Darlington Refurbishment Program appropriate?
- 7.6 Are the proposed test period in-service additions for the D2O Project reasonable?

## **8. PRODUCTION FORECASTS**

- 8.1 Is the proposed nuclear production forecast appropriate?

## **9. COMPENSATION**

- 9.1 Are the test period human resource related costs for the nuclear facilities (including wages, salaries, payments under contractual work arrangements, benefits, incentive payments, overtime, FTEs and pension and other post-employment benefit costs) appropriate?

## **10. OPERATING COSTS**

- 10.1 Is the test period Operations, Maintenance and Administration budget for the nuclear facilities appropriate?

10.2 Is the forecast of nuclear fuel costs appropriate?

### **Corporate Costs**

10.3 Are the corporate costs allocated to the nuclear business appropriate?

10.4 Are the centrally held costs allocated to the nuclear business appropriate?

10.5 Are the asset service fee amounts charged to the nuclear business appropriate?

### **Depreciation**

10.6 Is the proposed test period nuclear depreciation expense appropriate?

### **Income and Property Taxes**

10.7 Are the amounts proposed to be included in the test period nuclear revenue requirement for income and property taxes appropriate?

## **11. OTHER REVENUES**

### **Nuclear**

11.1 Are the forecasts of nuclear business non-energy revenues appropriate?

### **Bruce Generating Station**

11.2 Are the test period costs related to the Bruce Generating Station, and costs and revenues related to the Bruce lease appropriate?

## **12. NUCLEAR WASTE MANAGEMENT AND DECOMMISSIONING LIABILITIES**

12.1 Is the revenue requirement methodology for recovering nuclear liabilities in relation to nuclear waste management and decommissioning costs appropriate?

12.2 Is the revenue requirement impact of the nuclear liabilities appropriately determined?

### **13. DEFERRAL AND VARIANCE ACCOUNTS**

- 13.1 Is the nature or type of costs recorded and the methodologies used to record costs in the deferral and variance accounts related to OPG's nuclear and regulated hydroelectric assets appropriate?
- 13.2 Are the balances for recovery and the proposed disposition amounts in each of the deferral and variance accounts related to OPG's nuclear and regulated hydroelectric assets appropriate?
- 13.3 Is the proposed continuation of deferral and variance accounts related to OPG's nuclear and regulated hydroelectric assets appropriate?
- 13.4 Are the deferral and variance accounts that OPG proposes to establish appropriate?
- 13.5 Should the net sale proceeds of an unprescribed asset be recorded in a deferral and variance account?

### **14. REPORTING AND RECORD KEEPING REQUIREMENTS**

- 14.1 Are the proposed reporting and record keeping requirements, including performance scorecards proposed by OPG, appropriate?

### **15. RATE SMOOTHING**

- 15.1 Is OPG's proposal for smoothing nuclear payment amounts consistent with O. Reg. 53/05 and appropriate?

### **16.1 IMPLEMENTATION**

- 16.1 Are the effective dates for new payment amounts and riders appropriate?