



Independent Auditor's Report
Citywide Energy Management
June 10, 2019



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Nancy Freed, Deputy City Manager
City of Aurora
15151 E. Alameda Parkway
Aurora, CO 80012

Dear Nancy:

A City of Aurora (COA) energy-focused audit engagement commenced in late 2013; initial fieldwork ended in early 2014. Upon my hiring in May 2014, I, as the new Internal Audit Manager, reviewed the workpapers and the draft report and determined that additional work was required before we could issue a report of findings. The staff auditor originally assigned to the engagement retired from the City before the additional work was completed. In my judgment, the existing fieldwork was incomplete and insufficient upon which to base an opinion. I determined that it would be more cost effective to start a completely new engagement rather than try to correct the identified fieldwork issues in the existing workpapers as we had switched to an electronic audit management application.

The new engagement was part of the 2016 annual audit work plan. The new Energy engagement objectives were to:

- Assess the effectiveness and efficiency of controls within the key business processes related to activating and deleting energy accounts, monitoring energy usage, and paying and recording energy related invoices
- Assess the potential benefits of developing a citywide energy management plan
- Ensure that energy charges (including taxes) to the City are fair and accurate

The new engagement commenced in February 2016. Shortly thereafter, Internal Audit diverted resources from this new engagement to devote them to a higher priority engagement.

The priority engagement was lengthy, concluding in April 2018. The Management and Finance Committee (functioning as the City's audit committee) and City Management expressed a desire for Internal Audit to return to the Energy engagement. Internal Audit recommended that an energy consultant could best complete the engagement. Then Interim City Manager, Jason Batchelor, agreed.

Internal Audit offers the following findings¹ related to the engagement objectives based upon work conducted to date. We include Management’s Responses to our findings —from Dave Chambers, Director, Public Works, and Lynne Center, Facilities Project Delivery Manager—as well. (The actual response document is included at the end of this report.)

Summary Management Response to the Report: Public Works believes consolidating responsibility for managing City energy expenditures into Public Works and adding an FTE to Facilities Engineering to assist with the related tasks, addresses most, if not all, of the recommendations within this report.

Facilities Engineering staff is already working to refine the utility bill database that is uploaded to a software application, EnergyCAP, which allows efficient review of utility usage and can flag anomalies in the bills. A staff member within Facilities Engineering is already filling the role of Sustainability Engineer and currently monitors energy usage for some facilities using the EnergyCAP application. An additional staff member could enable Facilities Engineering to address all of the recommendations within this report.

The ability to harness our energy use data would allow us to become a more data driven operation, contribute significantly to our ability to better manage our energy costs, address billing anomalies, target more accurately potential projects to support energy conservation, and support the City’s sustainability goals. While there is no guarantee, it is likely that energy savings could cover the cost of the new FTE. As an alternative to a FTE, a paid internship would accomplish many of the one-time tasks.

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| <p>I. Objective: Assess the effectiveness and efficiency of controls within the key business processes related to activating and deleting energy accounts, monitoring energy usage, and paying and recording energy related invoices.</p> |
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We found that staff intended to be involved in the approval of energy invoices is mostly unaware regarding the process and their involvement responsibilities. We surveyed 12 of the 15 staff identified by Accounts Payable as email recipients for approving invoices. Only three understood that they had any role in the process. Consequently, every month the City is paying Xcel invoices without proper review and approval by those individuals responsible for the particular accounts. Finance performs a reasonableness review before paying invoices, but they should not be primarily responsible for doing so. They are not intimately aware of the details of an account and its purpose. Consequently, erroneous invoices and invoices for potentially fraudulent accounts may unknowingly be paid.

¹ Audit recommendations in the report are preceded by “ISS.#” The number that follows the aforementioned designation relates to the finding number in our TeamMate audit software. As not all recommendations in TeamMate are included in the final report, the numbers may appear to be incomplete. They will not appear in numerical order in this report since their generation in the audit software is not always chronological in relation to the audit objectives as reported.

ISS.9 Recommendation: Review the process for paying invoices, document it, and provide training to those staff that should be involved.

Management Response: Additional staff as proposed would be responsible for review, approval and, through Accounts Payable, payment of all utility bills for City-owned buildings, with exceptions as appropriate.

We interviewed Accounts Payable, Facilities Engineering, and IT staff to understand the processes for invoice processing and account management. In our opinion, there are control weaknesses that could lead to wasted City resources from erroneous, fraudulent, or inactive accounts.

1. *Invoice approval is passive (by exception.)* Accounts Payable assumes that if recipients do not contest an invoice within the seven-day approval period, it is approved for payment; however, Accounts Payable is not convinced that everyone is reading the invoices when they are sent. This is a valid assumption considering that staff is not aware of their approval responsibilities. Through an interview with Accounts Payable staff, we learned that Xcel Energy account data for existing accounts comes electronically to IT where a routine converts it into an HTML invoice and uploads it to Accounts Payable for processing. (An interview with IT staff confirmed this process.) Accounts Payable verifies the org and account splits and adds other information as necessary. Accounts Payable forwards the HTML invoices to a preset list of recipients via email for their review and approval. Recipients have seven (7) days to review the invoices to approve them for payment. If Accounts Payable does not receive a response from the recipients by the end of the seven-day period², they consider the invoices approved for payment and they process the invoices accordingly. Since staff is not actively approving the invoices, erroneous invoices may go undetected resulting in wasted City resources. Additionally, without active staff approver participation, staff designated to approve invoices may turn over with Accounts Payable never knowing and therefore being unable to update their email list in a timely manner, further harming the approval process.

ISS.1 Recommendation: Require that staff assigned invoice approval responsibilities actively review and approve energy invoices within the established approval period.

Management Response: Additional staff as proposed would be responsible for review, approval and, through Accounts Payable, payment of all utility bills for City-owned buildings, with exceptions as appropriate.

2. *No Accounts Payable notification for new accounts.* According to the Accounts Payable staff, City staff does not inform them when they open a new Xcel account. Accounts Payable receives paper invoices through the US mail for new Xcel Energy accounts. Accounts Payable must search out the new account owner to ascertain the appropriate org, account, and email contacts in order to pay the

² According to Accounts Payable, they "rarely" hear from anyone.

current and future invoices for the new Xcel account. Once they ascertain the owner, Accounts Payable forwards this information to IT for inclusion in the next data upload from Xcel. In the meantime, Accounts Payable is spending time chasing down information that the individual who opened the account could have provided beforehand by a simple email to Accounts Payable. This email would save Accounts Payable time and speed up invoice processing.

ISS.2 Recommendation: Require that staff opening new Xcel accounts email Accounts Payable and Facilities Engineering (for inclusion in energy management software) once the account is opened, and provide the service location, org, account, and email contacts for the new account.

Management Response: With the staff proposed, Facilities Engineering can develop and manage a process to approve activation of new energy accounts. This group, and staff, would be responsible for ensuring that new accounts are added to the EnergyCAP database.

3. **No authorization process for activating utility accounts.** The City does not have a policy or process regarding who may activate a utility account or for approving such action. The absence of such a process, in conjunction with the control weaknesses above, increases the risk that staff may establish a fraudulent or unnecessary account and avoid detection.

ISS.8 Recommendation: Develop a City policy that requires an approval signature on any request to establish a new utility account. We further recommend that the process include a provision that Xcel will not activate a City account without proof of authorization. Staff should forward information on the new account to Facilities Engineering and Accounts Payable to establish the account monitoring and invoicing processes, respectively.

Management Response: Public Works believes with development and management of a process for activation and deactivation of energy accounts (see responses to ISS.2 and 4), a City policy would not be required. Accounts Payable would be responsible only for processing payments of reviewed and approved bills/invoices from Facilities Engineering.

4. **No Accounts Payable notification for deactivated accounts.** According to Accounts Payable, staff does not inform them when inactive accounts require deactivation. Invoices for Xcel accounts are assumed to be approved for payment unless Accounts Payable is informed otherwise (see 1 above.) For inactive accounts, Accounts Payable will continue to pay an invoice until they receive instructions not to do so. Some accounts may be inactive for seasonal reasons (such as some sports park accounts); however, without notice to the contrary, Accounts Payable will continue to pay received invoices. This can result in wasted City resources.

ISS.4 *Recommendation*: Require that staff notify Accounts Payable and Facilities Engineering by email with the Xcel account number, service address, and the account closing date when an Xcel account deactivation is necessary.

Management Response: With the staff proposed, Facilities Engineering can develop and manage a process to approve deactivation of energy accounts. This group, and staff, would be responsible for ensuring deactivated accounts are removed from the EnergyCAP database.

5. *There is no master inventory list of approved meters in Facilities Engineering.* Facilities Engineering is developing a complete list of all meters based upon the master list used in Accounts Payable. Centralizing a master list in Facilities Engineering provides an opportunity for better oversight of the meters using the EnergyCAP software already in place (see below, ISS.5.)

ISS.10 *Recommendation*: Develop a complete inventory of all approved meters with regular reconciliations to Xcel and EnergyCAP. Once completed, the list should be reconciled to Xcel and confirmed for accuracy with internal stakeholders. (Internal Audit can assist with this task.) At least once per year, Facilities should reconcile their list to EnergyCAP and Xcel.

Management Response: Facilities Engineering is already working on this task as workloads permit. Additional staff as recommended could assist, and probably expedite, this effort. Once the database is refined and confirmed, reconciliation with Xcel bills could occur on a monthly basis.

Even with these control improvements, staff still may not have adequate information for making informed decisions regarding energy consumption or invoice approval.

The City of Aurora Public Works Department implemented EnergyCAP software in 2016. EnergyCAP is a management and accounting software for energy consumption. According to the EnergyCAP website, the software "is built around the concept of making energy information actionable through benchmarking, tracking and reporting." The application provides management capabilities for bill management, savings and analysis, sustainability, internal chargebacks, meter data analysis, and a host of reporting capabilities.

The City can arrange with Xcel and other energy providers to have account information captured in the EnergyCAP software via electronic data interchange (EDI.) The software includes a bill audit process that runs over 50 validity checks on every bill. The City would set the sensitivity levels for each bill. Normally, if a bill passes the audit process it is approved for payment; however, any bill could be set aside to be manually approved for

payment. Invoices that do not pass the audit checks could be set aside for dispute or paid and disputed later. The City would determine the process they would like to follow.

Approved bills are run through a routine developed by EnergyCAP that puts the information into a format acceptable to OneSolution. Accounts Payable would grab the file from an FTP folder and process it into OneSolution.

Not all of the City's electric meters are on the EnergyCAP system in Facilities Engineering. Adding all of the meters would require an estimate increase in the annual EnergyCAP costs of \$7,600 to \$11,500 depending upon the actual meter count and estimated one-time costs of between \$4,450 and \$5,250 also, dependent upon the final meter count. The system provides unlimited user access making the information in the system available to any necessary staff involved in monitoring, analysis, and invoice approval.

Implementing EnergyCAP as recommended would concentrate bill review and approval within the software and with the one new FTE in Public Works who would also be managing energy consumption. This would address recommendations ISS.9 and ISS.1 mentioned previously.

Westminster, CO implemented the EnergyCAP software in 2012. Their 2014 Comprehensive Energy Report states:

The bill payment portion has been working well with less billing errors, quicker response on the errors that do occur, and a streamlined payment system that has significantly reduced staff time across all departments. The energy use and reporting modules are also working well as evidenced by the more accurate and complete data contained in this report. This software runs on the internet so every employee, supervisor, and department has access to this information. It was a part of the success of the energy management plan at the Fire Department, as the Fire Station Captains were able to log in to see how they were doing.

ISS.5 Recommendation: Implement the EnergyCAP software citywide for monitoring energy usage. Evaluate the effectiveness of its invoice processing capabilities in relation to the existing processes and adjust the process as appropriate.

Management Response: As stated, additional costs are incurred with adding invoice processing to EnergyCAP. Additional staff as recommended could assist with, and implement, expansion of EnergyCAP to include this functionality. They would also have responsibility for utilizing this function to review and process utility bills.

II. **Objective:** Assess the potential benefits of developing a citywide energy management plan.

The 2009 Aurora Comprehensive Plan included, as part of the City's sustainability efforts [outside the scope of this engagement], energy related strategies aimed at efficiency

within City facilities. The new, but as yet unapproved, City comprehensive plan includes references to energy efficiency, specifically “[pursuing] potential strategies, programs, and partnerships to improve energy efficiency, and to leverage city resources for innovative energy sources” and “review[ing] energy efficiency standards and practices related to the construction and maintenance of city facilities.”

In addition, in May 2014 the City Council passed Resolution R2014-30 addressing the pursuit of sustainability in the new construction of City of Aurora buildings, upgrades, and retrofits to existing buildings and major renovations.

While the City does not have an official comprehensive internal strategic energy management plan, this does not mean that the City has been idle regarding efforts to improve energy efficiency across its operations. We interviewed selected staff across the City, including staff from Aurora Water, about their energy management efforts. Interview highlights follow below.

- ◆ In 2009, the City performed an energy and commissioning study on eight City buildings. In response, Public Works made these adjustments to some City buildings
 - Controlling building cooling/heating through building automation systems (BAS)
 - Replacing T12 fluorescents with T8 bulbs
 - Updating parking lot lighting
 - Expanding the use of LED's including traffic lighting
 - Installing occupancy sensors to control lighting when offices are unoccupied
- ◆ PROS and Aurora Golf have upgraded pumps, as necessary, to variable frequency pumps that ramp up slowly to their minimum necessary speed to pump water (saving energy). They also adjust watering schedules to minimize energy consumption. They use rain gauges to control sprinkler systems to conserve both water and energy³.
- ◆ In 2010, Aurora Water used federal stimulus funding to engage an energy management consultant (Montgomery, Watson, and Harza) to audit Aurora Water facilities (except Prairie Waters), develop a carbon footprint, evaluate renewal energy possibilities, and develop a utility-wide master plan.

According to the City Budget Manager, the City initiated the Green Fund (the Fund) in 2009 with an allocation of \$1 million. The Fund is a financing mechanism for internal energy saving projects. Departments “borrow” money from the fund to invest in energy saving projects. The Budget Department, annually during the project’s payback period, uses the estimated energy savings and “repays” the Green Fund through department budget reductions.

Initially, the Fund financed projects with a 3-5 year payback period. These projects included “low hanging fruit” such as lighting retrofits. Currently, the Fund is financing a few projects with a 5-7 year payback period. Public Works has stated that they had projects in mind that they believe would produce positive payback returns, but they did

³ While energy and water consumption is a consideration, they make irrigation decisions based on meeting citizen needs and maintaining quality sports facilities.

not know if they could be funded through the Green Fund as the paybacks were longer than previous projects. Currently, the Fund does not have resources set aside for any new projects. Funding for energy conservation projects would have to come from one-time General Fund resources. The Fund is insufficient for large-scale energy projects that often have payback periods exceeding 20 years.

An active, coordinated strategic energy management plan could fit well with the City efforts thus far and its desired strategies going forward.

The US Department of Energy endorses the institution of strategic energy management plans and offers guidelines for their initiation.

Strategic energy management is a long-term approach to energy efficiency that includes setting goals, tracking progress, and reporting results. A successful strategic energy management plan builds long-term relationships with energy users and targets persistent energy savings. The benefit of effective planning ensures continuous improvement of energy efficiency and increases the property value of buildings. For public buildings, strategic energy management reduces costs across many end uses, institutionalizes practices to sustain long-term savings, and can serve as a model for the private sector.⁴

Local governments aiming to reduce their city's energy usage might begin by writing a strategic energy management plan for the local government operations. Within this plan, an energy usage reduction goal should be established. We call planning and goal setting of this nature "leading by example." By practicing energy efficiency and environmental stewardship across city operations, highly localized best practices may be developed for adoption by managers of single buildings or building portfolios within the city.⁵

The City of Westminster, CO established an Energy Efficiency Conservation Strategy in 2009. As part of their strategy, they hired an Energy and Capital Improvement Projects Coordinator to "promote energy conservation, efficiency and affect the capital improvement design process toward energy efficiency." The Westminster City Council's 2012-2017 Strategic plan included having "energy and environmentally sensitive City operations." According to their 2012 Comprehensive Energy Report, the comprehensive energy plan "serves three purposes which are:

- To verify that the City is meeting the strategic goal of reducing energy consumption citywide;

⁴ <https://www.energy.gov/eere/slsc/data-driven-strategic-energy-management>

⁵ <http://aceee.org/local-government-energy-management-goals-best-practices-and-platforms>

- To demonstrate the myriad ways in which City staff contributes to energy conservation and energy efficiency through processes and programs used on a daily basis; and,
- To serve as an internal and external tool to communicate this stewardship to boost awareness and enhance continued efforts.”

Westminster considers every employee “in one way or [an]other, [as] an energy manager.” They involve all city staff in conservation efforts.

During our staff interviews, we asked for thoughts regarding the feasibility of a strategic energy management group to develop a comprehensive plan for the City. The consensus was:

1. An energy group would be a place for having innovative energy conversations, sharing conservation ideas, and prioritizing energy saving investment recommendations. The group could also train staff on ways to promote efficient energy consumption.
2. The City could gather and share energy consumption information to allow managers and staff to see the immediate impact on energy consumption from operational changes.
3. The group could identify energy saving projects and calculate the payback period. The City could consider funding projects from City assets when departmental resources are insufficient. The City could consider the merit of projects with payback periods that are longer than 5-7 years.

A strategic energy management group can leverage staff expertise, excitement, and creativity to improve energy efficiency efforts. Facilities Engineering staff possess energy management expertise. Staff can get excited about making a tangible difference if they believe Management values and supports their efforts. Management would need to ensure that participating staff are allowed time during the workday to actively engage in the group’s activities. In turn, Management would hold the group accountable for generating measurable returns on the investment of time and resources.

ISS.3 Recommendation: Establish a cross-departmental energy management team that brings together existing staff expertise from Planning and Public Works and staff from other City operations to develop a strategic energy management plan. Public Works Facilities Engineering staff could chair this group⁶. Leverage City staff creativity in developing and implementing energy efficiency projects, including creative funding solutions, to achieve targeted conservation goals.

Management Response: Additional staff would allow time for the existing Sustainability Engineer to develop a strategic energy management plan.

⁶ Facilities Engineering has a Senior Engineer on staff who is also a Certified Energy Manager. This individual is currently responsible for the EnergyCAP software in the City. This individual conducts energy use reviews for selected City facilities, reviews plans for new City construction, renovation and remodel projections, and is developing a program for building system retro-commissioning on a more regular basis to maintain cost-effective operational efficiency.

Such an effort would likely involve use of a qualified consultant whose work would be managed and reviewed by the Sustainability Engineer. While staff from other departments would be consulted and included, Public Works feels this process would be better served with responsibility assigned to a single staff member and would not benefit from formation of a standing committee. Staff would prepare regular progress updates to Management Staff on this effort.

III. **Objective:** Ensure that energy charges (including taxes) to City are fair and accurate.

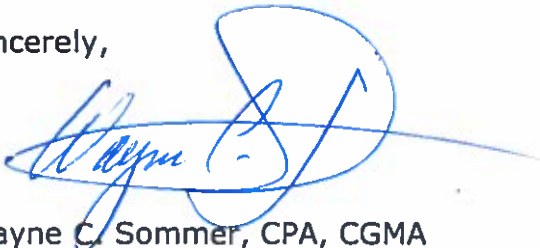
While the EnergyCAP software provides the ability to do this on a limited basis, the software installed in the City does not contain the information necessary to conduct this activity at this time. Internal Audit recommends that the City engage a consultant with specific expertise could more effectively complete this work.

ISS.6 Recommendation: We recommend that the City work through the appropriate procurement channels to obtain a qualified consultant to analyze the rates charged to the City to ensure the charges are fair and accurate.

Management Response: Facilities Engineering Staff, specifically Sustainability Engineer, periodically monitors rates charged by Xcel and compares them to national rates. Additional staff as proposed would enable this staff member to complete this task on a regular basis. However, because the City has a franchise agreement with Xcel for utility service (gas and electric) as the sole provider to properties within City limits, unless the rates are significantly different from other agencies within the Metro Area, our only recourse would be to challenge the rates with the PUC or terminate our agreement with Xcel. If that were to happen, Facilities Engineering would work with Management Staff to develop a strategy to challenge the rates. Public Works feels expending funds on a consultant specifically to review rates would not be of benefit to the City. However, this task could be included with development of a strategic plan, as recommended in item ISS.3.

It is our opinion that the Management Responses to our recommendations would be adequate to address them. We are happy to discuss the contents of this report at your convenience.

Sincerely,



Wayne C. Sommer, CPA, CGMA
Internal Audit Manager



To: Wayne Sommer, Internal Audit Manager

Via: Dave Chambers, Director of Public Works
Cindy Colip, Acting Deputy Director Public Works Engineering

From: Lynne Center, Facilities Project Delivery Manager

Date: January 23, 2019

Subject: Public Works Responses to Energy Audit Report

Public Works believes consolidating responsibility for managing City energy expenditures into Public Works and adding an FTE to Facilities Engineering to assist with the related tasks, addresses most, if not all, of the recommendations within this report.

Facilities Engineering staff is already working to refine the utility bill database that is uploaded to a software application, EnergyCAP, which allows efficient review of utility usage and can flag anomalies in the bills. A staff member within Facilities Engineering is already filling the role of Sustainability Engineer and currently monitors energy usage for some facilities using the EnergyCAP application. An additional staff member could enable Facilities Engineering to address all of the recommendations within this report. Specifically:

ISS.1 - Recommendation: *Require that staff assigned invoice approval responsibilities actively review and approve energy invoices within the established approval period.*

Additional staff as proposed would be responsible for review, approval and, through Accounts Payable, payment of all utility bills for City-owned buildings, with exceptions as appropriate.

ISS.2 Recommendation: *Require that staff opening new Xcel accounts email Accounts Payable and Facilities Engineering (for inclusion in energy management software) once the account is opened, and provide the service location, org, account, and email contacts for the new account.*

With the staff proposed, Facilities Engineering can develop and manage a process to approve activation of new energy accounts. This group, and staff, would be responsible for ensuring new accounts are added to the EnergyCAP database.

ISS.8 Recommendation: *Develop a City policy that requires an approval signature on any request to establish a new utility account. We further recommend that the process include a provision that Xcel will not activate a City account without proof of authorization. Staff should forward information on the new account to Facilities Engineering and Accounts Payable to establish the account monitoring and invoicing processes, respectively.*

Public Works believes with development and management of a process for activation and deactivation of energy accounts (see responses to ISS.2 and 4), a City policy would not be required. Accounts Payable would be responsible only for processing payments of reviewed and approved bills/invoices from Facilities Engineering.

***ISS.4 Recommendation:** Require that staff notify Accounts Payable and Facilities Engineering by email with the Xcel account number, service address, and the account closing date when an Xcel account deactivation is necessary.*

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Facilities Engineering is already working on this task as workloads permit. Additional staff as recommended could assist, and probably expedite, this effort. Once the database is refined and confirmed, reconciliation with Xcel bills could occur on a monthly basis.

***ISS.5 Recommendation:** Implement the EnergyCAP software citywide for monitoring energy usage. Evaluate the effectiveness of its invoice processing capabilities in relation to the existing processes and adjust the process as appropriate.*

As stated, additional costs are incurred with adding invoice processing to EnergyCAP. Additional staff as recommended could assist with, and implement, expansion of EnergyCAP to include this functionality. They would also have responsibility for utilizing this function to review and process utility bills.

***ISS.3 Recommendation:** Establish a cross-departmental energy management team that brings together existing staff expertise from Planning and Public Works and staff from other City operations to develop a strategic energy management plan. Public Works Facilities Engineering staff could chair this group. Leverage City staff creativity in developing and implementing energy efficiency projects, including creative funding solutions, to achieve targeted conservation goals.*

Additional staff would allow time for the existing Sustainability Engineer to develop a strategic energy management plan. Such an effort would likely involve use of a qualified consultant whose work would be managed and reviewed by the Sustainability Engineer. While staff from other departments would be consulted and included, Public Works feels this process would be better served with responsibility assigned to a single staff member and would not benefit from formation of a standing committee. Staff would prepare regular progress updates to Management Staff on this effort.

***ISS.6 Recommendation:** We recommend that the City work through the appropriate procurement channels to obtain a qualified consultant to analyze the rates charged to the City to ensure the charges are fair and accurate.*

Facilities Engineering Staff, specifically Sustainability Engineer, periodically monitors rates charged by Xcel and compares them to national rates. Additional staff as proposed would enable this staff member to complete this task on a regular basis. However, because the City has a franchise agreement with Xcel for utility service (gas and electric) as the sole provider to properties within City limits, unless the rates are significantly different from other agencies within the Metro Area, our only recourse would be to challenge the rates with the PUC or terminate our agreement with Xcel. If that were to happen, Facilities Engineering would work with Management Staff to develop a strategy to challenge the rates. Public Works feels expending funds on a consultant specifically to review rates would not be of benefit to the City. However, this task could be included with development of a strategic plan, as recommended in item ISS.3.

As an alternative to a FTE, a paid internship would accomplish many of the one-time tasks, such as database verification; developing a standard utility bill payment process; and coordinating with EnergyCap to add accounts and capabilities as needed. These one-time tasks would help determine whether enough savings would be generated to fund a FTE to complete and/or manage on-going tasks.

Please contact me if you need additional information.

