



File: 292-30/OGC2019-022

July 2, 2019

VIA ELECTRONIC MAIL:

Dear

**Re: Request for Information – Release
Freedom of Information and Protection of Privacy Act (FOIPPA)**

I am writing further to your request received by the BC Oil and Gas Commission (Commission) on May for the following:

“I am requesting information pertaining to the BC Oil and Gas Commission’s scoring and evaluation of the winning bid for RFP #1859001, Website Rebuild Project: Build Phase. I would like to see how the winning bid was scored based on the evaluation criteria in the RFP. I would also like to see any documentation from the BC Oil and Gas Commission that supports the selection of the winning vendor during the selection process, to better understand the decision-making process.”

Please be advised that some of the records you requested contain information that is excepted from disclosure under FOIPPA. Severed information has been withheld pursuant to Section 17 (Disclosure harmful to the financial or economic interests of a public body) and Section 21 (Disclosure harmful to business interests of a third party) of FOIPPA. An electronic copy of the remaining information is being provided to you in accordance with FOIPPA.

A complete copy of FOIPPA is available online at:
http://www.bclaws.ca/Recon/document/ID/freeside/96165_00

If you or your company previously submitted a proposal in response to RFP #1859001 and have questions related to the contract award process and/or evaluation of your submission, we encourage you to contact the Commission’s procurement specialist at:
Finance@bcogc.ca

Pursuant to section 52 of the FOIPPA, you may ask the Office of the Information and Privacy Commissioner (OIPC) to review any decision, act, or failure to act with regard to your request. You have 30 business days from the date of this letter to request a review by writing to:

Information and Privacy Commissioner
PO Box 9038 Stn Prov Govt
4th Floor, 947 Fort Street
Victoria BC V8W 9A4
Phone: 250.387.5629
Fax: 250.387.1696
Email: info@oipc.bc.ca

If you request a review, please provide the OIPC with the following:

1. A copy of your original request;
2. A copy of the Commission's response;
3. Copies of correspondence with the Commission directly related to your request; and
4. The reasons or grounds upon which you are requesting the review.

For more information on the complaint and review process, please visit the OIPC website:
<https://www.oipc.bc.ca>

If you have any questions regarding your request or require any further clarification, please write to us at: FOIIntake@bcogc.ca.

Sincerely,



Kathryn Smerechinskiy
BC Oil and Gas Commission

RFP 18519001
Evaluation of mandatory criteria

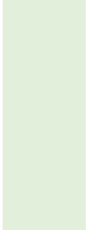


JC
 12/14/2018

	Receipt before deadline	Electronic submission	Personal Information Confirmation	Independence and Objectivity Statement	Detailed hourly rates for all contractors	Total estimated cost provided	Result
		s21					
NATIONAL Public Relations	Yes	Yes	Yes	Yes	Yes	Yes	Criteria met
		s21					

Met mandatory criteria 12
 Did not meet mandatory criteria 3

RFP 18519001

Proponent evaluation - National

	Guidance		Rationale
Proponent's qualifications and relevant experience		Weight	45%
<ul style="list-style-type: none"><input type="checkbox"/> Named Resources<input type="checkbox"/> Education<input type="checkbox"/> Experience in website design and build for similar, complex government organizations<input type="checkbox"/> Experience coding and using the proposed CMS<input type="checkbox"/> Resumes included for project team members named in your response<input type="checkbox"/> Experience with engagement of internal government stakeholders, industry proponents, the public and First Nations<input type="checkbox"/> Experience with formal project management<input type="checkbox"/> Available to meet in the Commission's Victoria office<input type="checkbox"/> Knowledge of the Commission and its website is an asset<input type="checkbox"/> Knowledge of the oil and gas industry an asset	<i>To evaluate using detailed requirements in section 5.2</i>	Score	
Suitability of the proposed approach		Weight	35%
<ul style="list-style-type: none"><input type="checkbox"/> Proposed project timeline with major tasks and milestones, including budget breakdown<input type="checkbox"/> Proposed approach/ methodology addresses objectives and deliverables<input type="checkbox"/> Project management approach captures full project lifecycle	<i>To evaluate using detailed requirements in section 5.2</i>	Score	
Added Value		Weight	5%
<ul style="list-style-type: none"><input type="checkbox"/> Additional scope that may improve project outcomes	<i>To evaluate using detailed requirements in section 5.2</i>	Score	
Pricing		Weight	15%

RFP 18519001

Proponent evaluation - National - AD

Proponent's qualifications and relevant experience	Guidance	Weight	45%	Rationale
<ul style="list-style-type: none"> <input type="checkbox"/> Named Resources <input type="checkbox"/> Education <input type="checkbox"/> Experience in website design and build for similar, complex government organizations <input type="checkbox"/> Experience coding and using the proposed CMS <input type="checkbox"/> Resumes included for project team members named in your response <input type="checkbox"/> Experience with engagement of internal government stakeholders, industry proponents, the public and First Nations <input type="checkbox"/> Experience with formal project management <input type="checkbox"/> Available to meet in the Commission's Victoria office <input type="checkbox"/> Knowledge of the Commission and its website is an asset <input type="checkbox"/> Knowledge of the oil and gas industry an asset 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 35%	s17/s21
Suitability of the proposed approach				
<ul style="list-style-type: none"> <input type="checkbox"/> Proposed project timeline with major tasks and milestones, including budget breakdown <input type="checkbox"/> Proposed approach/ methodology addresses objectives and deliverables <input type="checkbox"/> Project management approach captures full project lifecycle 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 5%	
Added Value				
<ul style="list-style-type: none"> <input type="checkbox"/> Additional scope that may improve project outcomes 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 15%	
Pricing				
		Score	s17/s21	

RFP 18519001

Proponent evaluation - National - CD

	Guidance	Weight	Rationale
Proponent's qualifications and relevant experience		45%	
<ul style="list-style-type: none"> <input type="checkbox"/> Named Resources <input type="checkbox"/> Education <input type="checkbox"/> Experience in website design and build for similar, complex government organizations <input type="checkbox"/> Experience coding and using the proposed CMS <input type="checkbox"/> Resumes included for project team members named in your response <input type="checkbox"/> Experience with engagement of internal government stakeholders, industry proponents, the public and First Nations <input type="checkbox"/> Experience with formal project management <input type="checkbox"/> Available to meet in the Commission's Victoria office <input type="checkbox"/> Knowledge of the Commission and its website is an asset <input type="checkbox"/> Knowledge of the oil and gas industry an asset 	<p><i>To evaluate using detailed requirements in section 5.2</i></p>	<p>s17/s21 Weight 35%</p>	
Suitability of the proposed approach			
<ul style="list-style-type: none"> <input type="checkbox"/> Proposed project timeline with major tasks and milestones, including budget breakdown <input type="checkbox"/> Proposed approach/ methodology addresses objectives and deliverables <input type="checkbox"/> Project management approach captures full project lifecycle 	<p><i>To evaluate using detailed requirements in section 5.2</i></p>	<p>Score s17/s21 Weight 5%</p>	
Added Value			
<ul style="list-style-type: none"> <input type="checkbox"/> Additional scope that may improve project outcomes 	<p><i>To evaluate using detailed requirements in section 5.2</i></p>	<p>Score Weight 15%</p>	
Pricing			

RFP 18519001

Proponent evaluation - National - DM

Proponent's qualifications and relevant experience	Guidance	Weight	45%	Rationale
<ul style="list-style-type: none"> <input type="checkbox"/> Named Resources <input type="checkbox"/> Education <input type="checkbox"/> Experience in website design and build for similar, complex government organizations <input type="checkbox"/> Experience coding and using the proposed CMS <input type="checkbox"/> Resumes included for project team members named in your response <input type="checkbox"/> Experience with engagement of internal government stakeholders, industry proponents, the public and First Nations <input type="checkbox"/> Experience with formal project management <input type="checkbox"/> Available to meet in the Commission's Victoria office <input type="checkbox"/> Knowledge of the Commission and its website is an asset <input type="checkbox"/> Knowledge of the oil and gas industry an asset 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 35%	s17/s21
<p>Suitability of the proposed approach</p> <ul style="list-style-type: none"> <input type="checkbox"/> Proposed project timeline with major tasks and milestones, including budget breakdown <input type="checkbox"/> Proposed approach/ methodology addresses objectives and deliverables <input type="checkbox"/> Project management approach captures full project lifecycle 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 5%	
<p>Added Value</p> <ul style="list-style-type: none"> <input type="checkbox"/> Additional scope that may improve project outcomes 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 15%	
<p>Pricing</p>				

RFP 18519001

Proponent evaluation - National - GC

Proponent's qualifications and relevant experience	Guidance	Weight	45%	Rationale
<ul style="list-style-type: none"> <input type="checkbox"/> Named Resources <input type="checkbox"/> Education <input type="checkbox"/> Experience in website design and build for similar, complex government organizations <input type="checkbox"/> Experience coding and using the proposed CMS <input type="checkbox"/> Resumes included for project team members named in your response <input type="checkbox"/> Experience with engagement of internal government stakeholders, industry proponents, the public and First Nations <input type="checkbox"/> Experience with formal project management <input type="checkbox"/> Available to meet in the Commission's Victoria office <input type="checkbox"/> Knowledge of the Commission and its website is an asset <input type="checkbox"/> Knowledge of the oil and gas industry an asset 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 35%	s17/s21
<p>Suitability of the proposed approach</p> <ul style="list-style-type: none"> <input type="checkbox"/> Proposed project timeline with major tasks and milestones, including budget breakdown <input type="checkbox"/> Proposed approach/ methodology addresses objectives and deliverables <input type="checkbox"/> Project management approach captures full project lifecycle 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 5%	
<p>Added Value</p> <ul style="list-style-type: none"> <input type="checkbox"/> Additional scope that may improve project outcomes 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 15%	
<p>Pricing</p>				

RFP 18519001

Proponent evaluation - National - TM

			Rationale
Proponent's qualifications and relevant experience	Weight	45%	
<input type="checkbox"/> Named Resources			
<input type="checkbox"/> Education			
<input type="checkbox"/> Experience in website design and build for similar, complex government organizations			
<input type="checkbox"/> Experience coding and using the proposed CMS			
<input type="checkbox"/> Resumes included for project team members named in your response			
<input type="checkbox"/> Experience with engagement of internal government stakeholders, industry proponents, the public and First Nations			
<input type="checkbox"/> Experience with formal project management			
<input type="checkbox"/> Available to meet in the Commission's Victoria office			s17/s21
<input type="checkbox"/> Knowledge of the Commission and its website is an asset			
<input type="checkbox"/> Knowledge of the oil and gas industry an asset	Score	s17/s21	
Suitability of the proposed approach	Weight	35%	
<input type="checkbox"/> Proposed project timeline with major tasks and milestones, including budget breakdown			
<input type="checkbox"/> Proposed approach/ methodology addresses objectives and deliverables			
<input type="checkbox"/> Project management approach captures full project lifecycle	Score	s17/s21	
Added Value	Weight	5%	
<input type="checkbox"/> Additional scope that may improve project outcomes	Score		
Pricing	Weight	15%	

RFP 18519001

Evaluation of desirable criteria - proponent summary

	Qualifications and relevant experience	Methodology	Added Value	Pricing	Total
	s17/s21				
NATIONAL Public Relations					79,6
	s17/s21				

RFP 18519001

Total price evaluation

Hourly rate	Engagement	Weighted score
	s17/s21	
NATIONAL Public Relations	s17/s21	

RFP 18519001

Proponent evaluation - National - Evaluation Team

Proponent's qualifications and relevant experience	Guidance	Weight	45%	Rationale
<ul style="list-style-type: none"> <input type="checkbox"/> Named Resources <input type="checkbox"/> Education <input type="checkbox"/> Experience in website design and build for similar, complex government organizations <input type="checkbox"/> Experience coding and using the proposed CMS <input type="checkbox"/> Resumes included for project team members named in your response <input type="checkbox"/> Experience with engagement of internal government stakeholders, industry proponents, the public and First Nations <input type="checkbox"/> Experience with formal project management <input type="checkbox"/> Available to meet in the Commission's Victoria office <input type="checkbox"/> Knowledge of the Commission and its website is an asset <input type="checkbox"/> Knowledge of the oil and gas industry an asset 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 35%	s17/s21
Suitability of the proposed approach				
<ul style="list-style-type: none"> <input type="checkbox"/> Proposed project timeline with major tasks and milestones, including budget breakdown <input type="checkbox"/> Proposed approach/ methodology addresses objectives and deliverables <input type="checkbox"/> Project management approach captures full project lifecycle 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 5%	
Added Value				
<ul style="list-style-type: none"> <input type="checkbox"/> Additional scope that may improve project outcomes 	<i>To evaluate using detailed requirements in section 5.2</i>	Score Weight	s17/s21 15%	
Pricing				

EVALUATION OF PROPOSALS

An evaluation committee is established as part of the Request for Proposals (RFP) process. This committee is responsible for evaluating all proposals against the evaluation criteria included in the RFP document.

The committee may be a combination of Commission staff and contractors, but it may not be fully contracted out.

Evaluation committee

The committee will include at least: the project manager; a technical person; and procurement specialist. The number of people will depend on the complexity of the project. However, if the committee is too large it may complicate the process. A committee of three to six members usually works best.

All committee members should be present for the entire evaluation period and should be involved in reviewing all proposals. The evaluation committee is still responsible for assigning a score to the proposals. Although the evaluation committee is not required to be involved until the evaluation process starts, the evaluation process will be much easier if the committee was involved in drafting the RFP and preparing the evaluation criteria.

Conflicts of Interest

If a member of the evaluation committee is in a position of actual or perceived conflict of interest, the fairness of the entire RFP process may be questioned. Therefore, committee members and anyone else involved in preparation of the RFP should declare any potential conflicts of interest. This may be particularly relevant if the evaluation committee member is a contractor rather than a Commission employee.

The Employee Code of Conduct defines a conflict of interest from the context of a Commission employee. From the perspective of the RFP process, a member of the evaluation committee may be considered to be in a conflict of interest if the individual:

- has a friendship or familial relationship with one of the proponents;
- has a strong bias for or against one of the proponents;
- has a direct or indirect financial interest in a proponent's business;
- has assisted in preparation of a proposal; or
- has received a gift from one of the proponents.

This list provides a few examples to illustrate the concept of conflicts of interest. If a member of an evaluation committee considers themselves to be in a position that constitutes a conflict of interest, or that could be perceived by someone else to potentially be a conflict of interest, the conflict should be declared and the individual may be asked to withdraw from the RFP process.

Committee Members Responsibility

During the evaluation process, committee members must treat all proponents fairly and equally, and evaluate their proposals in accordance with the process described in the RFP document. Care must be taken throughout the process, not to take any actions or make any decisions that could be construed as providing an unfair advantage to any proponent(s).

As committee members are entrusted with or have access to information governed by the *Freedom of Information and Protection of Privacy Act*, they must ensure the necessary confidentiality of the Commission and third party information. Evaluation committee members will be expected to:

- keep the proposals, and any notes they might make relating to them, in a secure place where others will not have access to them;
- refrain from discussing the proposals or disclosing their contents to anyone other than fellow committee members;
- retain copies of all notes and memoranda in accordance with the requirements of the *Freedom of Information and Protection of Privacy Act*;
- keep all notes, discussions, and point ratings confidential and not disclose their substance or details to anyone;
- evaluate the proposals strictly in accordance with the evaluation criteria stated in the RFP;
- evaluate proposals solely on information contained therein, not on the committee's previous knowledge of the proponent or its business; and
- score proposals strictly in accordance with the methodology and point ranges established in the RFP.

The first meeting may not take place until after the closing date of the RFP. However, the committee will usually meet earlier in the process to obtain agreement on confidentiality requirements; review the evaluation criteria and draft scoring sheets; and make plans for subsequent meetings.

The Procurement Specialist will be responsible for creating a master record of the scores and keeping notes explaining each score. This information forms part of the permanent record and may be made available to unsuccessful proponents during the debriefing. It is important to write supporting comments for both high scores and low scores. There is a natural tendency to put more emphasis on documenting the areas in which the proponent falls short. However, a benefit of documenting both positive and negative feedback is that, during debriefing meetings, the Commission is able to comment on the proposal's strengths as well as areas that require improvement.

Evaluation Criteria

The first step in the evaluation process is to check each proposal in turn for its compliance with the mandatory criteria. This step will be performed by the Procurement Specialist. This must be done before the full committee sits to evaluate proposals. Assessing the mandatory criteria involves assessing whether the proposal meets or does not meet each mandatory criterion. Any proposal not fully meeting all mandatory criteria must be rejected without further consideration.

After the mandatory criteria have been evaluated, proposals that meet all mandatory requirements are assessed against the stated desirable criteria. The two main methods of scoring the desirable criteria are:

1. the proponent's response to each criterion is discussed and team members come to consensus agreement on the score; or
2. team members individually score the proposals and the proponent's score is an average of the individual scores.

The committee can decide which method would work better. Usually, proposals will be evaluated one at a time and will be compared to the stated evaluation criteria. Because the criteria reflect the Commission's needs, this is a more supportable approach than that of comparing each proposal to the others. An exception to this can be the evaluation of price.

Arcs file #: 100-00/200

Issuance: Corporate Services

1.0 GENERAL

1.1 Purpose

The intent is to adhere to the highest ethical standards in the acquisition of contracted services; and to ensure the Commission receives the best value for the money spent, that is, service and supply contracts are economical, efficient and effective.

1.2 Background

A contract is a binding agreement between two or more parties, in this case, between the Oil and Gas Commission (Commission) and the contractor. Contracts may be awarded to individuals, partnerships, companies, non-profit societies and other entities. All potential contractors must be given the same consideration.

2.0 POLICY

2.1 Acquisition for goods under \$25,000.00

- Under \$5,000 – may be direct awarded.
- \$5,000 to \$14,999 – need to obtain 1-2 quotes, where practical and the costs of obtaining quotes are reasonable.
- \$15,000 to \$24,999 – need to obtain 2-3 quotes, where practical and the costs of obtaining quotes are reasonable.

Quotes can be written or printed from email, and must become part of the contract file. If verbal quotes are obtained, a note-to-file must be included as part of the contract file.

2.2 Acquisition for goods over \$25,000.00

With an estimated value of \$25,000 or greater, must be awarded using a competitive process that is appropriate to the value complexity and profile of the business opportunity unless the conditions for direct awarding apply (see 2.6 Direct Award). Competitive process may be any of the following depending on the business need:

- Request for Proposal (RFP)
- Invitation to Quote (ITQ)
- Invitation to Tender (ITT)
- Request for Qualifications (RFQ)
- Request for Information (RFI)

2.3 Acquisition for services under \$75,000.00

- Under \$10,000 – may be direct awarded.
- \$10,000 to \$24,999 – need to obtain 1-2 quotes, where practical and the costs of obtaining quotes are reasonable.
- \$25,000 to \$74,999 – need to obtain 2-3 quotes, where practical and the costs of obtaining quotes are reasonable.

Quotes can be written or printed from email, and must become part of the contract file. If verbal quotes are obtained, a note-to-file must be included as part of the contract file.

2.4 Acquisition for services or construction \$75,000.00 or greater

Acquisition of any services or construction with an estimated value of \$75,000, or the establishment of a standing offer for the supply of services or construction with of an estimated value of \$75,000 must be awarded using a competitive process that is appropriate to the value complexity and profile of the business opportunity unless the conditions for direct awarding apply (see 2.6 Direct Award). Competitive process may be any of the following depending on the business need:

- Request for Proposal (RFP)
- Invitation to Quote (ITQ)
- Invitation to Tender (ITT)
- Request for Qualifications (RFQ)
- Request for Information (RFI)

2.5 Trade Agreements

As required in accordance with the provisions of the Agreement of Internal Trade (AIT) and the BC - Alberta Trade, Investment, and Labour Mobility Agreement (TILMA), if the expected contract value is over the goods, services or construction threshold the contractor is to be selected through a competitive process. The competitive process will evaluate each supplier's proposed approach, or pricing, or other elements required for the project.

2.6 Direct Award

The Commission shall seek competitive written bids or proposals for contracts over \$75K and should hold a competition for those under \$75K to the extent reasonable and cost-effective. Contracts may be negotiated and directly awarded without competitive process only where one of the following exceptional conditions applies:

- the contract is with another government organization;
- the Commission can show [a very high test] that only one contractor is qualified to provide the goods, services or construction or is capable of engaging in a disposal opportunity;
- an unforeseeable emergency exists and the goods, services or construction could not be obtained in time by means of a competitive process;
- a competitive process would interfere with a Commission's ability to maintain security or order or to protect human, animal or plant life or health; or
- the acquisition is of a confidential or privileged nature and disclosure through an open bidding process could reasonably be expected to compromise the Commission confidentiality, cause economic disruption or be contrary to the public interest.

When direct awarding a contract, the Commission will :

- Document the rationale for direct awarding explicitly in the contract file using notes to file. (*i.e. this contractor has worked for us for "x" years and therefore is the only one able to do the work.*)
- Request a proposal from the contractor before drafting the contract. The proposal should include: what will be provided, how it will be provided, what resources (staff, equipment) will be used to produce the product or deliverables, how principal risks will be eliminated, transferred or minimized by the contractor, as well as the costing of the services.
- Post a Notice of Intent on BC Bid if the contract exceeds \$75K for services or construction, or \$25K for goods. If it can be shown that there is only one vendor that can do the work, a Notice of Intent need not be issued. (*i.e. buying Oracle software from Oracle, in this type of situation to issue an NOI would only be additional time and work for the client and there would not be any responses from the vendor community.*)

2.7 Planning

Before taking any steps to find a contractor, the Commission must ensure that a cost / benefit justification exists for the contract, including, where appropriate, comparing the cost of contracting out with the cost of providing the service in-house if the resources were available. Contract outcomes must be defined; and the contract must be consistent with policy, applicable legislation, and trade and collective agreements.

2.8 Multi-year Contracts

For work that was initially tendered and is continuing over fiscal years the Commission does not need to re-bid the work every year. Contracts that extend over 2 year period will be evaluated to ensure that the Commission is still getting value.

2.9 Conflict of interest

An employee must not participate in a contracting decision if the contract involves a direct relative, a person married to a direct relative, or a person sharing the same household as the employee. A direct relative means a spouse, parent, grandparent, grandchild, brother, sister, son, or daughter.

An employee who is exposed to an actual, perceived or potential conflict of interest in relation to an actual or proposed solicitation must disclose the matter to his or her supervisor and/or the contract manager. If, after review, it is determined that there is a conflict, the supervisor or contract manager must remove the employee from this particular contract situation. An employee who fails to disclose a conflict of interest can be subject to disciplinary action up to and including dismissal. Any suspected conflicts of interest will be investigated.

2.9 Post Evaluation

A post-completion evaluation is required on every contract over \$50K to provide a record of the contractor's performance and to assist in future contracting activity.

2.10 Internal Audit

Contracts that are over \$50K will be randomly selected and reviewed on an annual basis by the Business Intelligence & Audit group.

2.11 Pre-qualified Vendor

A pre-qualified vendor list may be established using a RFQ. Opportunities to be registered on a pre-qualification list should be advertised on a regular basis. Contracts can be awarded directly to vendors on the pre-qualification list if the provisions merit it; rotated such that equal opportunity is provided when under \$50K; selectively or by an evaluated award between \$50K and \$100K; and by using a competitive process when the contract value exceeds \$100K.

2.12 Drafting

All procurement should be processed by the Contract Administrator prior to any contracts being signed by the spending authority or the proponent, and prior to any work being started.

Approval Date: June 25, 2012

Approved by:



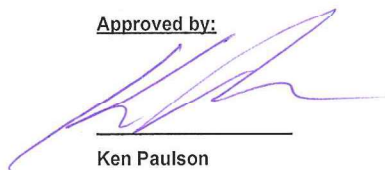
Paul Jeakins
Commissioner

Approved by:



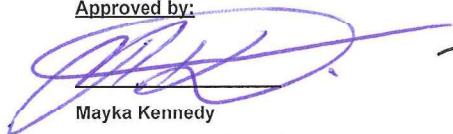
Randall Smith
Chief Financial Officer

Approved by:



Ken Paulson
Chief Operating Officer

Approved by:



Mayka Kennedy
Chief Engineer

Approved by:



Trevor Swan
General Counsel & Corporate Secretary

Annual Review*				

* The Policy Coordinator will review annually and work with division directors on any changes that may be deemed necessary.