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September 9, 2025

VIA ELECTRONIC FILING

Mike Bull
Deputy Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals

Docket No. G999/CI-21-565

Supplemental Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Bull:

On May 5, 2025, the Minnesota Public Utilities Commission (“Commission”) issued a Notice of Comment Period (the “Notice”) requesting comments be filed in the above-referenced docket surrounding the issue of what action(s), if any, should the Commission take to modify existing gas line extension policies (“LEPs”) for rate regulated gas utilities. On July 8, 2025, several parties submitted comments in response to the Notice. On August 6, August 8, August 29, and September 2, 2025, several parties submitted Reply Comments.¹ Minnesota Energy Resources Corporation (“MERC” or the “Company”) submits these Supplemental Reply Comments in response to those August 8, 2025 comments.

Many of the same parties who filed comments July 8, 2025 also filed Reply Comments on August 8, 2025, with the parties continuing to advocate for their original recommendations. The Company will briefly touch upon the continuing and recurring positions in these Supplemental Reply Comments. There were seven parties who filed comments on August 8, 2025, who did not file comments on July 8, 2025: CURE, Minnesota Biofuels Association, Minnesota Corn Growers Association, the Minnesota Farm Bureau Federation, the Coalition of Greater Minnesota Cities, Great Plains

¹ While parties submitted Reply Comments on August 6, August 8, August 29 and September 2, 2025, MERC collectively refers to these Reply Comments being filed on August 8, 2025.

Natural Gas Co, and Sherburne County Economic Development Authority. The Company will address in these Supplemental Reply Comments any new issues and/or positions brought forth. MERC continues to support no modifications to how gas utilities calculate footage allowances and other costs related to gas main and service line extensions.

MERC does not believe modifications to its LEPs are warranted. Service line extensions directly follows the utility's obligation to serve. Under Minnesota law, natural gas utilities have an obligation to provide continuous, safe, reliable, and affordable service to all customers and as further explained in these comments, LEPs permit natural gas utilities the ability to fulfill that obligation.

Line Extension Policy does not run counter to Minnesota Legislation

Some parties continued to contend in their August 8, 2025 comments in the above-referenced docket that LEP runs counter to current Minnesota Legislation surrounding goals for reduction of greenhouse gas ("GHG") emissions. MERC continues to disagree with this assertion. As presented by multiple studies,^{2, 3} a dual-fuel approach can be a low cost approach that significantly reduces emissions. As stated at page 58 of the G21 Report, many stakeholders noted:

- Electrification with gas backup scenario lessens some of the risks of both high gas costs and the costs of building a much larger electric system to accommodate all space heating in the coldest hours of winter.
- Modeling results showed that this [dual-fuel] scenario would be the lowest cost option. The [dual-fuel] scenario lowers costs by requiring a smaller electric system build-out compared to the high electrification scenario, largely because of lower winter peak demand as well as avoided transmission and distribution system investments.
- The [dual-fuel] scenario reduces the costs of decarbonized gaseous fuels by avoiding significant amounts of the most expensive gaseous fuel, synthetic natural gas, as compared to the high decarbonized gas scenario.
- The [dual-fuel] scenario would continue to use existing gas system infrastructure, reducing the risk of stranded assets when compared to the high electrification scenario.

² Peterson, C.R., K.A. McDermott, and R.C. Hemphill, (2025). *Analysis of Potential Pathways to a Clean Energy Future in Illinois*, Prepared for the American Gas Association, Washington, DC. (the "Illinois Study")

³ Great Plains Institute, Center for Energy and Environment, 2021. *Decarbonizing Minnesota's Natural Gas End-Uses*. <https://e21initiative.org/wp-content/uploads/2021/07/Decarbonizing-NG-End-Uses-Stakeholder-Process-Summary.pdf>. (the "G21 Report")

Therefore natural gas and LEPs can, and should, play an important role in emissions reductions and presents a cost effective approach.

As stated by Housing First Minnesota in both their July 8, 2025 and August 8, 2025 comments, Minnesota's Residential Code requires heating systems to maintain indoor temperatures of at least 68°F in extreme cold, without portable heaters. Further, as stated in Housing First Minnesota's comments, current technology limitations means that even the best cold-climate heat pumps require supplemental heating on the coldest days. A dual-fuel approach accomplishes this, while significantly reducing emissions and contributing to GHG emissions reductions goals. Additionally, as reiterated by Laborers' International Union of North America Minnesota & North Dakota ("LIUNA") in their August 8, 2025 comments, the dual-fuel approach also avoids the requirement of building out the electric grid for a 100% electric approach, thereby avoiding purchases of electricity at exorbitant cost and ultimately avoids grid failures.

While Rewiring America in their August 8, 2025 comments paints a rosy picture of Minnesota decarbonizing its electric grid and utilities turning to clean, flexible solutions to meet peak demand while relying less on fossil-fueled generation, the clear fact remains that, in Minnesota, solar power and wind turbines are not going to be able to meet the peak demand of heating homes on the coldest days of the year. As detailed in the Illinois Study⁴, in order to fully decarbonize, electric utilities will need to invest in additional generation resources, including a large amount of battery storage, along with reinforcement of the electric transmission and distribution grids, at an exorbitant cost in order to meet peak demand on the coldest days of the year. The most reasonable and cost effective alternative to this is a dual-fuel approach and allowing customers to continue to use line extensions to connect to the gas system.

As stated by LIUNA in their August 8, 2025 comments, reduction of line extension allowances ("LEAs") or elimination of line extensions is not likely to achieve the desired outcome of mass adoption of air source heat pumps by rural households that currently rely on delivered fuels or wood, but instead continued reliance on the most expensive and/or dirty forms of energy. Instead, by continuing LEAs and line extensions, customers of delivered fuels are allowed access to gas utility service (without being forced to pay thousands of dollars up front for the privilege of having affordable energy, cleaner air or basic consumer protections) and these line extensions will help contribute to GHG emissions reductions. This is especially true for MERC which has a large portion of its service territory serving rural customers.

MERC concurs with LIUNA in their August 8, 2025 comments that reducing LEAs or eliminating line extensions would keep Minnesotans dependent on delivered fuels or wood, which not only contributes to energy insecurity and strips these customers of critical protections, but also undercuts the state's climate and environmental goals by denying them access to energy efficiency programs and increases GHG emissions and other pollutants. As pointed out by MERC in the LEP Study filed by the Company in

⁴ *Id.*

Docket No. G011/GR-22-502⁵, a 2023 study of customers showed that if MERC had not been able to extend natural gas service to them, they would have used propane as their energy source instead.

While already stated in the Company's August 8, 2025 comments, MERC will continue to reiterate again that there is a difference between reduced natural gas usage, and still needing the gas system in place to meet peak demand, which is the amount of gas that is needed on the coldest day of the year. Continuing LEAs and line extensions allow customers to connect to the gas system, and a dual-fuel approach contributes to low natural gas usage and reduced GHG emissions, while still keeping the customer warm and meeting that peak day demand on the coldest day of the year.

LEAs and line extensions will continue to play a vital role in a dual-fuel future. MERC also notes that under a dual-fuel approach there would not be a situation of stranded gas system assets, nor would there be a need for the gas utilities to create decommissioning funds as recommended by CURE in their August 8, 2025 comments. The Company agrees with Center for Energy and Environment ("CEE") in that innovative rate design will be needed under a dual-fuel approach. CEE provided an example in their August 8, 2025 comments of an innovative rate design approach used in Canada under a dual-fuel approach to service. The Commission, in their Notice of Current Scope of Docket and Timeline issued January 17, 2025 in the above-referenced docket, detailed that rate design issues will be discussed, and the Company believes that future comment period will be the appropriate forum to discuss innovative rate designs.

Using a dual-fuel approach, whereby natural gas backup systems provide heat on the coldest days to customers in Minnesota is not only the most reasonable approach, but the most cost effective approach – all while reducing emissions and contributing towards Minnesota's GHG reduction goals. LEP will play a vital role in that cost effective, dual-fuel future for Minnesota, and changes to LEP at this critical juncture would have unwarranted, detrimental impacts.

MERC's Line Extension Policy provides a fair, equitable, and accurate approach to connecting new customers to the natural gas system

In comments filed by various parties on August 8, 2025, there was recommendations to phase out and/or eliminate LEAs, and to require new customers to pay for the costs of the extension. MERC continues to advocate that no changes be made to current LEP, including LEAs. In the LEP Study filed by MERC in Docket No. G011/GR-22-502⁶, the Company has shown that changes to LEP would cause inequitable treatment between

⁵ Docket No. G011/GR-22-504, *In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Natural Gas Rates in Minnesota*, Compliance Filing (November 14, 2024).

⁶ *Id.*

new and existing customers, not only from a cost perspective, but also from a benefits perspective.

As pointed out by MERC and various parties in both July 8, 2025 and August 8, 2025 Comments, removal of the LEAs would place undue burden upon and create cost barriers for new customers. As detailed by Minnesota local governments⁷, “building development costs continue to increase on an already tight housing market”.⁸ Further detailed by CEE, Housing First Minnesota, Minnesota local governments, the Coalition of Greater Minnesota Cities (“CGMC”), Sherburne County Economic Development Authority, and CenterPoint Energy in their July 8, 2025, August 8, 2025 and September 2, 2025 Comments, eliminating LEAs would increase cost of a new home and home affordability. Additionally, changes to LEP will cause uncertainty and further restrict Minnesotans’ access to attainable housing.

While CUB stated in their August 8, 2025 comments that the utilities have offered “no analysis” that shows that maintaining LEP aligns with meeting or exceeding GHG goals, the Company would respond by stating that it does not require analysis to understand that connecting delivered fuel customers to the natural gas system reduces GHG emissions. Additionally, the utilities file information in annual Energy Conservation and Optimization (“ECO”) filings. Lastly, the utilities are also going to be filing a wealth of information in the upcoming Gas Integrated Resource Plans (“IRPs”), which will allow the Commission to make further determinations on this issue. The Company would also suggest that it may make the best sense for the Commission to first work through the first Gas IRP filing (to be filed by Xcel Energy on July 1, 2026), and understand the workings, results and impacts of the Gas IRP filing, before considering changes to LEP.

MERC continues to contend that the assumptions utilized in the Company’s current LEP and LEA are reasonable. The OAG in their August 8, 2025 comments recommended that the utilities should use the depreciation period authorized in their most recently approved depreciation certifications. As noted by MERC in its LEP Study, the Company does already utilize in its LEP the depreciation period authorized by the Commission in its most recent Five Year Depreciation Study. The weighted average depreciable service life of the assets utilized in a line extension (i.e. main, service line, and meter) from that Commission-approved Depreciation Study is 48 years, and therefore the Company utilizes a 48 year payback period within its Customer Extension Model (“CEM”).

Second, in their August 8, 2025 comments, the OAG was concerned that it would be too difficult to determine an accurate estimate of future statutory compliance costs. While OAG agrees that externality costs are important considerations, this is a factor that they suggest the Commission could account for when exercising its judgment to determine the appropriate payback period, rather than including these difficult to estimate costs in an extension allowance cost justification calculation. As stated in the LEP Study,

⁷ St. Louis Park, Eden Prairie, Richfield, Edina, Hopkins, Bloomington, and City of Saint Paul.

⁸ Minnesota Local Governments July 8, 2025 Comments filed in the above-referenced docket, page 2.

MERC, along with LEP Study stakeholders, agreed that there is difficulty in determining an adjustment attributable to externality costs for incorporation into the CEM. While the Commission could exercise judgment in determining an appropriate (i.e. shortened) payback period as a means of accounting for externality costs, MERC notes that shortening the payback period contained within the CEM would then misalign with OAG's recommendation that utilities use the depreciation period authorized in their most recently approved depreciation studies.

Lastly, MERC concurs with Xcel Energy's statement at page 21 of their August 8, 2025 comments that "if line extension allowances are eliminated, new customers would need to pay for their own line extension costs up front, while also paying for costs for line extensions that are currently in base rates for those customers who received the line extension allowances." Continuing with the current LEP and LEAs ensures fair treatment of new versus existing customers.

Natural Gas is a safe, reliable service

In their August 8, 2025 comments, CURE made the statement that "the natural gas system is more dangerous for customers than the electric system." The Company disagrees: the natural gas system is a heavily regulated industry, not only at the state level, but also as a federal level, with regards to safety.

MERC, and other natural gas utilities, must comply with federal and state regulations that require natural gas utilities to implement integrity management programs to assess and improve the safety, reliability, and integrity of its natural gas infrastructure. Pursuant to the federal Pipeline Inspection, Protection, Enforcement and Safety Act and Pipeline and Hazardous Materials Safety Administration ("PHMSA") rules, all system operators must know the make-up of their distribution system and adopt written distribution integrity management plans for distribution pipelines.⁹ The law requires distribution system operators to continually identify and assess risks on their distribution systems to remediate conditions that present a potential threat to the integrity of their pipeline system. At the state level, not only is there this Commission, but there is also the Minnesota Office of Pipeline Safety ("MNOPS") that is responsible for pipeline inspections, education and enforcement throughout the state.

As stated by CURE in their August 8, 2025 comments, while electric fires are a danger, the risk and damage of houses exploding due to natural gas are more severe. Again, MERC views this statement as pure opinion and conjecture. Electricity can have dangerous, if not more dangerous, consequences; while CURE references 257 fatalities from the natural gas system over a 20 year period, the U.S. Fire Administration states that 310 fatalities caused by residential electrical building fires occurred over a three

⁹ PHMSA published the Integrity Management Program for Gas Distribution Pipelines Rule or the "DIMP Rule" (49 C.F.R. Part 192, subpart P) in December 2009.

year period.¹⁰ This is a significantly higher number of average annual fatalities from the electric system (i.e. 103.3) versus the gas system (i.e. 15.5). The National Fire Protection Association (“NFSA”) has statistics over a five year period showing an estimated average of 390 civilian fatalities annually caused by electrical failure or malfunction.¹¹

CURE went on to state in their August 8, 2025 comments that there was a total reported cost of natural gas incidents at \$11.3 million nationwide over that 20 year period. In contrast, the U.S. Fire Administration stated there was a cost of \$871 million nationwide in property loss due to residential building electric fires over a three year period. Again, this results in a significantly higher average annual cost of damages from the electric system (i.e. \$290.3 million) versus the gas system (i.e. \$565,000).¹² The NFSA has statistics over a five year period showing an estimated \$1.5 billion in direct property damage from electrical failure or malfunction per year.

It is abundantly clear that the natural gas system, while not without its dangers, is a safe and reliable system. There is no doubt that federal and state regulations and oversight, along with the gas utilities’ management of the distribution system, help to contribute to the safety of the natural gas system.

Another striking fact stated by the U.S. Fire Administration is that residential building electrical fires occurred most often in the winter month of January.¹³ This fact is further confirmed by the NFSA: three in ten fires (30%) involving electrical failure or malfunction occurred in the cold weather months from November through February.¹⁴ If the state of Minnesota were to fully decarbonize, the electric system would move to having a winter peak, and it makes one wonder if this shift of the electric system to a winter peak could exacerbate the U.S. Fire Administration statistic on residential building electrical fires occurring most often in January, as well as NFSA’s statistic that three in ten fires (30%) involving electrical failure or malfunction occurred in the cold weather months from November through February.

Lastly, the majority of the electric system relies upon overhead transmission and distribution lines, whereas the natural gas distribution system utilizes underground pipes. Storms, whether containing wind, ice or snow, can have a significant impact upon electric distribution lines, whereas underground natural gas lines are protected

¹⁰ Residential Building Electrical Fires (2014-2016); December 2018, Volume 19, Issue 8. U.S. Fire Administration. <https://www.usfa.fema.gov/statistics/reports/fire-causes/electrical-fires-v19i8.html>

¹¹ Home Fires Caused by Electrical Failure or Malfunction; October 31, 2021. National Fire Protection Association. <https://www.nfpa.org/education-and-research/research/nfpa-research/fire-statistical-reports/home-fires-caused-by-electrical-failure-or-malfunction>

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

from such elements, contributing to natural gas service being reliable and safe during times of severe weather.

Electricity is generally not more resilient to price swings than other major commodities like natural gas

CURE stated in its August 8, 2025 comments that it is not reasonable to encourage building two separate systems – one for electricity for cooling and another for providing gas heat, and that diversity of electric generation makes electricity prices more resilient to price swings. The Company respectfully disagrees.

CURE makes an inaccurate assumption that natural gas is only used for heating purposes. There are many commercial, agricultural and industrial customers that utilize natural gas within their businesses, as confirmed by the August 8, 2025 comments of the Minnesota Biofuels Association, Minnesota Corn Growers Association and the Minnesota Farm Bureau Federation. Additionally, as shown by the G21 Report and the Illinois Study, a dual fuel approach is cost efficient and reduces risk. The G21 Report's summary of key findings states:

The Electrification with Gas Back Up decreases electricity system costs by more than half compared to a High Electrification scenario and shows lowest overall resource costs compared to the other scenarios. At the same time, this scenario is more resilient to variance in commodity costs and therefore shows benefits in risk mitigation compared to a High Decarbonized Gas scenario.

Generally, electricity is not more resilient to price swings than other major commodities, such as natural gas. While retail electricity rates for consumers can be more stable due to regulation, this only masks the underlying volatility of the wholesale electricity market. Wholesale electricity prices can be volatile due to:

- 1) Lack of storage: Unlike natural gas, electricity cannot be stored economically on a large scale; this means supply and demand must be balanced constantly in real-time, which creates sharp price fluctuations. While in a fully decarbonized environment, large scale battery storage would be required, the Illinois Study speaks to the exorbitant costs large scale battery storage poses;
- 2) Dependence on volatile fuels: Natural gas is often the price-setting fuel for wholesale electricity markets, especially during peak hours; its price is subject to large swings from global events, weather, and market dynamics;
- 3) Infrequent transmission: Issues like transmission line congestion can prevent low-cost power from reaching high-demand areas, causing regional prices to spike dramatically; and

- 4) Variable demand and supply: Demand is predictable but changes constantly by the minute, hour, and season. Supply can also change unexpectedly from weather events, plant outages, or the variability of renewable generation.¹⁵

MERC does agree with CURE's statement at page 9 of their August 8, 2025 comments that there are many factors that can increase the cost of a commodity, whether that commodity is electricity or natural gas. To incorrectly assume that one can control the volatility of a commodity market or accurately predict the volatility is folly.

Conclusion

Gas line extensions and gas line extension policy plays a pivotal role in natural gas utilities' ability to continue investing in their distribution systems, which is essential as utilities continue to prudently plan their systems to keep customers safe, while making sure they have the heat needed during the coldest Minnesota winter evenings and that commercial customers have the energy they need to operate their businesses and employ Minnesotans.

MERC notes that while parties stated that LEAs incentivize customers to connect to the natural gas system, does not the same rationale apply for electric LEAs? The Department in their July 8, 2025 comments stated it was important and necessary to cease incentives for gas line extensions (through their recommended elimination of LEAs), which will provide signals to electric utilities and policy makers to consider electric space heating rates that address the economics of electric heating. Yet, if electric utilities, municipalities and cooperatives are allowed to continue to apply LEAs to connecting customers to the electric system, how does that create an even playing field for natural gas service and provide equal customer choice?

The Company appreciates the opportunity to provide these Supplemental Reply Comments, and takes the following positions in regard to the specific questions posed in the Commission's Notice:

- No modifications to how gas utilities calculate footage allowances and other costs related to gas main and service line extensions.
 - Gas line extensions and allowances provide both social and economic benefits to customers, businesses and communities throughout the state of Minnesota.
 - Removal or reduction of LEAs, and/or changes to LEPs can shift benefits away from new customers and onto the existing customer base, which in turn, can create government-imposed inequitable service, inequitable access to energy and inequitable potential for economic growth.

¹⁵ Open Electricity Economics Handbook; Chapter 4: The price and value of electricity. <http://open-electricity-economics.org/book/text/04.html>

- The Commission has historically looked at each natural gas utility individually, rather than taking a “one-size-fits-all” approach. Looking at each natural gas utility individually is appropriate, given the vastly different service territories of each utility, and the differing circumstances required to provide service to the varying customer classes, such as urban, rural, agricultural, or industrial, that comes with that service territory diversity.
- MERC’s LEP Study provides insight to specific examples of modifications to its LEPs and the impacts of those changes, although MERC continues to caution that other natural gas utilities’ LEPs are not identical to MERC’s and therefore LEP modifications can and will have differing impacts on each natural gas utility.
- Comparisons to other states’ actions on LEP should not drive this Commission’s actions.
 - Clearly stated by Housing First Minnesota in their August 8, 2025 comments: comparisons to Maine or other states with different climate profiles, building codes, and energy market structures are misleading.
 - There have not been any discernable lessons learned from other states showing the impacts of eliminating LEAs and line extensions on customers (particularly low-income customers, as well as commercial, agricultural and industrial customers), on energy usage, GHG emissions, the housing market, or state economy.
 - Instead of placing merit on the actions of other Commissions located outside of the Midwest, MERC recommends that the Commission take into consideration the 2025 Illinois Study; this study provides excellent insight to potential pathways for a Midwest state to achieve cost effective decarbonization goals.
- MERC’s current LEP differentiates between residential and commercial customer classes, and that distinction should remain. Under MERC’s LEP, class distinction is important; residential customers receive a LEA and commercial customers do not.
- The needs of, and impact to, low-income customers need to be considered when reviewing LEP. There needs to be consideration of the financial burden any changes to LEP will have on these customers. Especially in times such as these when there are drastic changes and impacts to funding from the federal government for energy assistance, MERC believes that caution must be taken when reviewing LEPs and the incremental impact it could have on low-income customers.

Additionally, the Company takes the following positions in regards to the specific recommendations proposed by various parties in their July 8, 2025 and/or August 8, 2025 comments:

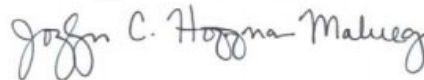
- MERC does not support CEE’s proposed requirement that gas utilities that have a LEA for residential customers propose a comprehensive single-family new construction ECO program.
- New Area Surcharge (“NAS”) policy is not in scope of the Notice. An NAS is permissible under Minn. Stat. § 216B.1638, Recovery of Natural Gas Extension

Project Costs, which was signed into law on June 13, 2015. MERC views the topic of ending natural gas expansion, which would include NAS, as being outside of the scope of the Notice.

- Regarding instituting GHG emissions benchmarking for gas utilities, the NGIA has already been enacted to address gas utilities' efforts to reduce GHG emissions, and the Commission has also required Xcel Energy, CenterPoint Energy and MERC to file Gas IRPs, which will also address GHG emissions. Allowing the current legislation and Commission Orders to proceed as designed is the best path of action.
- MERC does not oppose LIUNA's recommendation that, if the Commission were inclined to make changes to LEP, that "the threshold for approval of line extensions be changed from [the] current requirement that each line extension must be at least cost-neutral to customers to a requirement that a utility's overall extension program be cost-neutral."
- MERC sees similarities and/or duplication amongst the current six questions and three concerns regarding LEP that the utilities currently respond to in general rate case proceedings as compared to the OAG's recommended four questions, and CEE's recommended five questions. MERC would be supportive of answering questions the Commission deems applicable to LEPs on a cadence the Commission deems appropriate.
- MERC does not support CURE's recommendation that gas utilities be required to pay into a decommissioning trust that will cover the full decommissioning and removal of existing natural gas infrastructure. As detailed in the above comments, under a dual-fuel approach, the gas system will still be used and useful, therefore there would be no need for such decommissioning funds.

DATED: September 9, 2025

Respectfully submitted,



Joylyn Hoffman Malueg
Senior Project Specialist
Minnesota Energy Resources Corporation

cc: Service List

In the Matter of a Commission Evaluation of
Changes to Natural Gas Utility Regulatory
and Policy Structures to Meet State
Greenhouse Gas Reduction Goals

Docket No. G999/CI-21-565

CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 9th day of September, 2025, on behalf of Minnesota Energy Resources Corporation (“MERC”), I electronically filed a true and correct copy of the enclosed Supplemental Reply Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service lists.

Dated this 9th day of September, 2025

/s/ Colleen T. Sipiorski
Colleen T. Sipiorski

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