

November 27, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E002/M-13-867
In the Matter of Northern States Power Company, dba Xcel Energy, for Approval of Its Proposed
Community Solar Garden Program.

Dear Mr. Seuffert:

On September 22, 2023, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment Period seeking comment on Northern States Power Company, dba Xcel Energy (Xcel) calculation of its 2024 Value of Solar (VOS) rate.

The Minnesota Department of Commerce (Department) offers the attached comments on Xcel's calculation. The Department recommends **conditional approval** of Xcel's 2024 VOS rate, subject to a 30-day negative check-off of a recalculation to reflect current developments related to the social cost of carbon, and recommends the Commission **continue** the requirement for Xcel to file updated VOS calculations. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Louise I. Miltich
Assistant Commissioner of Regulatory Affairs



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Division of Energy Resources

Docket No. 13-867

I. BACKGROUND

The Minnesota Public Utilities Commission (Commission) adopted the Value of Solar methodology (VOS) in its April 1, 2014, Order in Docket No. E999/M-14-65, and approved its use for Northern States Power Company, d/b/a Xcel Energy's (Xcel or the Company) Solar*Rewards Community (CSG) Program in the Commission's September 6, 2016, order in this docket. Minn. Stat. § 216B.164, subd. 10(h), requires Xcel to recalculate the Value of Solar (VOS) on an annual cycle and file the VOS with the Commission for approval. Consistent with state law, the Commission's March 4, 2020, order in this docket also requires Xcel to submit an annual VOS update filing.

On September 1, 2023, Xcel submitted its VOS calculation for 2024. In its filing, Xcel noted that Minn. Stat. § 216B.1641 was amended in the 2023 legislative session to create a new CSG program. Under the new program, compensation for CSGs approved after January 1, 2024, is prescribed by Minn. Stat. § 216B.1641, subd. 8; not based on the VOS. Therefore, the 2023 vintage year will be the final vintage for which bill credits are based on the VOS. Citing this change, Xcel requested the Commission end the VOS update filing requirements for year 2025 and beyond.

On September 22, 2023, the Commission issued a Notice of Comment Period seeking comment on Xcel's calculation of VOS rates for 2024.

II. DEPARTMENT ANALYSIS

In its Notice of Comment Period, the Commission requested that parties comment on the following:

- A. Should the Commission approve the 2024 VOS?
- B. Should the Commission discontinue the requirement for Xcel to file updated value-of-solar (VOS) calculations, as found in the Commission's March 4, 2020, Order?
- C. Are there other potential uses and applications for the VOS?
- D. Are there any other issues or concerns related to this matter?

A. SHOULD THE COMMISSION APPROVE THE 2024 VOS?

The Department has reviewed Xcel's proposed VOS rates and concludes that Xcel's calculations are mathematically correct and consistent with past practice. Based on this, the Department concludes that the rates comply with the approved VOS methodology. Xcel's calculation of avoided environmental cost, however, does not reflect current developments related to the social cost of

carbon dioxide (a greenhouse gas). On February 7, 2023, Governor Walz signed Minnesota Session Laws 2023, Chapter 7, section 18, which revised Minn. Stat. § 216B.2422, subd. 3, to require the Commission to “provisionally adopt and apply the draft cost of greenhouse gas emissions valuations (social cost of greenhouse gases), as presented in the U.S. Environmental Protection Agency’s (EPA) *External Review Draft of Report on the Social Cost of Greenhouse Gases: Estimates incorporating Recent Scientific Advances*.” The law took effect on the date of enactment.

On September 14, 2023, the Commission voted to update the Commission’s January 3, 2018, Order in Docket E-999/CI-14-643 to provisionally adopt and apply the draft cost of greenhouse gas emissions valuations presented in the EPA’s *External Review Draft of Report on the Social Cost of Greenhouse Gases* released in September 2022, and its successors, consistent with Minn. Stat. § 216B.2422, subd. 3. The Department believes the 2024 VOS calculation should reflect this development through an update to the avoided environmental cost as soon as the Commission’s order is filed in docket 14-643.

The Department recommends the Commission require Xcel to update the 2024 VOS calculations to reflect the Commission’s adoption of the draft cost of greenhouse gas emissions valuations as presented in EPA’s *External Review Draft of Report on the Social Cost of Greenhouse Gases: Estimates incorporating Recent Scientific Advances*, with approval of the recalculated 2024 VOS subject to a 30-day negative check-off.

B. SHOULD THE COMMISSION DISCONTINUE THE REQUIREMENT FOR XCEL TO FILE UPDATED VOS CALCULATIONS, AS FOUND IN THE COMMISSION’S MARCH 4, 2020, ORDER?

As noted in the Commission’s Notice of Comment Period, Minn. Stat. § 216B.1641 was amended in the 2023 legislative session. Minn. Stat. § 216B.1641, subd. 8 applies to the new CSG program administered by the Department and establishes a new rate methodology for compensating CSGs. Pursuant to Minn. Stat. § 216B.1641, subd. 1(d) and (h)(2)(i), CSGs approved before January 1, 2024, in Xcel’s Legacy Program, continue to receive compensation under subdivision 1(d), which includes the VOS rate.

The 2023 legislative amendments did not, however, change Minn. Stat. § 216B.164, subd. 10, which is a tariff rate that is not limited to CSGs. Moreover, subdivision 10 (h) requires that “The utility shall recalculate the alternative tariff on an annual cycle, and shall file the recalculated alternative tariff with the commission for approval.” The plain language of the statute, therefore, continues to require that Xcel perform the annual calculation and file the recalculated tariff with the Commission for its approval.

The Department agrees with Xcel that the requirement from the March 4, 2020 Order for Xcel to file an updated VOS may no longer be necessary for the sole purpose of calculating CSG bill credits. However,

the Department recommends that the Commission continue to require Xcel to calculate and file annual updates consistent with Minn. Stat. § 216B.164, subd. 10(h).

C. ARE THERE OTHER POTENTIAL USES AND APPLICATIONS FOR THE VOS?

Although VOS will not be the basis for establishing bill credit amounts for CSG projects with vintage years 2024 and beyond, the Department believes the ongoing calculation of VOS continues to provide value. As stated in statute, VOS provides an assessment of the value of distributed solar to the utility, its customers and society¹ in terms of “the value of energy and its delivery, generation capacity, transmission capacity, transmission and distribution line losses, and environmental value.”² A proper VOS calculation remains crucial for assessing the value provided to ratepayers by distributed solar generation and weighing both the costs and the benefits of distributed solar generation.

In 2013 the legislature directed the Department to conduct a robust stakeholder process to develop the value of solar methodology, and then seek Commission approval of its methodology.³ In the years since the establishment of the methodology, there has been robust discussion of the methodology at the Commission. The Department believes there may be important opportunities to evolve the methodology moving forward to reflect our changing energy landscape.⁴

III. CONCLUSION

The Department recommends that the Commission require that Xcel, subject to a 30-day negative check-off, recalculate 2024 VOS rates to reflect avoided environmental costs consistent with Minn. Stat. § 216B.2422, subd. 3, and continue the requirement for Xcel to annually file updated VOS calculations.

¹ Cite to 2014 Department VOS Methodology

² Minn. Stat. 216B.164, subd. 10(f).

³ 216B.164 Subd. 10(f)

⁴ The VOS methodology may also account for “based on known and measurable evidence of the cost or benefit of solar operation to the utility, incorporate other values into the methodology, including credit for locally manufactured or assembled energy systems, systems installed at high-value locations on the distribution grid, or other factors.” Minn. Stat. 216B.164, subd. 10(f).

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E002/M-13-867

Dated this 27th day of **November 2023**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	ross.abbey@us-solar.com	United States Solar Corp.	100 North 6th St Ste 222C Minneapolis, MN 55403	Electronic Service	No	OFF_SL_13-867_Official
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No	OFF_SL_13-867_Official
Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_13-867_Official
Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC	855 Village Center Drive #256 North Oaks, MN 55127	Electronic Service	No	OFF_SL_13-867_Official
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-867_Official
Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, MN 55455	Electronic Service	No	OFF_SL_13-867_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-867_Official
Kevin	Cray	kevin@communitysolaraccess.org	CCSA	1644 Platte St Denver, CO 80202	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Timothy	DenHerder Thomas	timothy@cooperativeenerg yfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
James	Denniston	james.r.denniston@xcelen ergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_13-867_Official
Brian	Edstrom	briane@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_13-867_Official
Betsy	Engelking	betsy@nationalgridrenewa bles.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-867_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self- Reliance	2720 E. 22nd St Institute for Local Self- Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_13-867_Official
Nathan	Franzen	nathan@nationalgridrenew ables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-867_Official
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_13-867_Official
Sean	Gosiewski	sean@afors.org	Alliance for Sustainability	2801 21st Ave S Ste 100 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Scott	Greenbert	scott@nautilussolar.com	Nautilus Solar Energy, LLC	396 Springfield Aver, Ste 2 Summit, NJ 07901	Electronic Service	No	OFF_SL_13-867_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_13-867_Official
Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments	8100 Boone Blvd Suite 430 Vienna, VA 22182	Electronic Service	No	OFF_SL_13-867_Official
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_13-867_Official
Julie	Jorgensen	juliejorgensen62@gmail.com	Greenmark Solar	4630 Quebec Ave N New Hope, MN 55428-4973	Electronic Service	No	OFF_SL_13-867_Official
Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_13-867_Official
Ralph	Kaehler	Ralph.Kaehler@gmail.com		13700 Co. Rd. 9 Eyota, MN 55934	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, MN 55118	Electronic Service	No	OFF_SL_13-867_Official
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_13-867_Official
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_13-867_Official
Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200 Wayzata, MN 55391	Electronic Service	No	OFF_SL_13-867_Official
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-867_Official
Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jason	Maur	jason.maur@renesolapower.com	Renesola Power Holdings, LLC	850 Canal Street 3rd Floor Stamford, CT 06902	Electronic Service	No	OFF_SL_13-867_Official
Matthew	Melewski	matthew@nokomisenergy.com	Nokomis Energy LLC & Ole Solar LLC	2639 Nicollet Ave Ste 200 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, MN 55120	Electronic Service	No	OFF_SL_13-867_Official
Michael	Menzel	mike.m@sagiliti.com	Sagiliti	23505 Smithtown Rd. Suite 280 Excelsior, MN 55331	Electronic Service	No	OFF_SL_13-867_Official
Marc	Miller	mmiller@soltage.com	Soltage, LLC	66 York Street, 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_13-867_Official
Marcus	Mills	Marcus@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Pouya	Najmaie	pouya@cooperativeenergyfutures.com	Cooperative Energy Futures	3416 16th Ave S Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_13-867_Official
Logan	O'Grady	logrady@mNSEIA.org	Minnesota Solar Energy Industries Association	2288 University Ave W St. Paul, MN 55114	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patty	O'Keefe	patty.okeefe@sierraclub.org		2525 Emerson Ave S Apt 2 Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_13-867_Official
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_13-867_Official
Eric	Pasi	ericp@ips-solar.com	IPS Solar	2670 Patton Rd Roseville, MN 55113	Electronic Service	No	OFF_SL_13-867_Official
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_13-867_Official
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
Morgan	Pitz	morgan.pitz@us-solar.com	US Solar	100 N 6th St #410B Minneapolis, MN 55403	Electronic Service	No	OFF_SL_13-867_Official
Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now	N/A	Electronic Service	No	OFF_SL_13-867_Official
Paula	Prahl	paula.prahl@dominiuminc.com	Dominium	2905 Northwest Blvd Ste 150 Plymouth, MN 55441	Electronic Service	No	OFF_SL_13-867_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official
Jonathan	Roberts	jroberts@soltage.com	Soltage	66 York St 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_13-867_Official
Delaney	Russell	delaney@mnipl.org	Just Solar Coalition	4407 E Lake Street Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Kyle	Samejima	kyle@mplsclimate.org	Minneapolis Climate Action	N/A	Electronic Service	No	OFF_SL_13-867_Official
Ian	SantosMeeker	ians@ips-solar.com	IPS Solar	N/A	Electronic Service	No	OFF_SL_13-867_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-867_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-867_Official
David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions	2303 Wycliff St Ste 300 St. Paul, MN 55114	Electronic Service	No	OFF_SL_13-867_Official
Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC	233 Park Ave S Ste 201 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-867_Official
Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light	N/A	Electronic Service	No	OFF_SL_13-867_Official
Anna	Tobin	atobin@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Zack	Townsend	zachary.townsend@brookfi eldrenewable.com	Brookfield Renewable	200 Liberty St FL 14 New York, NY 10281	Electronic Service	No	OFF_SL_13-867_Official
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
John	Vaughn	Nik@rreal.org	Rural Renewable Energy Alliance	3963 8th Street SW Backus, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
Kevin	Walker	KWalker@beaconinterfaith. org	Beacon Interfaith Housing Collaborative	N/A	Electronic Service	No	OFF_SL_13-867_Official
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_13-867_Official
Jessica	Welk	jwelk@sherman- associates.com	Sherman Associates	233 Park Avenue South Suite 201 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Curtis P	Zaun	curtis@cpzlaw.com	Attorney At Law	3254 Rice Street Little Canada, MN 55126	Electronic Service	No	OFF_SL_13-867_Official