

May 25, 2022

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-21-767

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Northern States Power Company, d/b/a Xcel Energy's 2021 Hosting Capacity Analysis Report.

The report was filed on November 1, 2021, by:

Bria E. Shea
Director, Regulatory & Strategic Analysis
Northern States Power Company d/b/a/ Xcel Energy Services Inc.
414 Nicollet Mall
Minneapolis, MN 55401

The Department requests that Xcel Energy provide additional information in Reply Comments. The Department is available to respond to any questions the Minnesota Public Utilities Commission may have on this matter.

Sincerely,

/s/ MATTHEW LANDI
Rates Analyst

ML/xx
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-21-767

I. BACKGROUND

On November 1, 2021 Xcel Energy (Xcel or the Company) filed its 2021 Hosting Capacity Analysis Report (the 2021 Report) as required by Minn. Stat. §216B.2425, subd. 8 (the Statute) and the Minnesota Public Utilities Commission's (Commission) November 9, 2021 Order in Docket No. E002/M-20-812 (the 2021 HCA Order) regarding Xcel Energy's 2020 Hosting Capacity Report (the 2020 Report).¹ On November 19, 2021, the Commission issued an Erratum Notice correcting page 5 of the 2021 HCA Order and ordering paragraph 3, which inadvertently included the phrase "unique line segment numbers."²

Further, on February 1, 2022 and on May 2, 2022, Xcel filed its February 2022 and May 2022 quarterly updates of the HCA, respectively (February 2022 Update and May 2022 Update).^{3,4}

Minn. Stat. §216B.2425, subd. 8, states:

Subd. 8. Distribution study for distributed generation. Each entity subject to this section that is operating under a multiyear rate plan approved under section 216B.16, subdivision 19, shall conduct a distribution study to identify interconnection points on its distribution system for small-scale distributed generation resources and shall identify necessary distribution upgrades to support the continued development of distributed generation resources, and shall include the study in its report required under subdivision 2.

¹ *In the Matter of the Xcel Energy 2020 Hosting Capacity Report Under Minn. Stat. §216B.2425, Subd. 8* (2020 Report). ORDER ACCEPTING REPORT, REQUIRING ADDITIONAL STAKEHOLDER WORKSHOPS, AND SETTING ADDITIONAL REQUIREMENTS (2021 HCA Order). Docket No. E002/M-20-812. November 9, 2021. Accessed at: <https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={E0FB057D-0000-CA15-B7C7-3F05BED0B949}&documentTitle=202111-179611-01>.

² 2020 Report. Erratum Notice. November 19, 2021. Accessed at: <https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={E0FB057D-0000-CA15-B7C7-3F05BED0B949}&documentTitle=202111-179611-01>.

³ 2021 Report, Quarterly Update – February 2022 (February 2022 Update). February 1, 2022. Accessed at: <https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={9097B67E-0000-C716-9AA5-2C0C5641D3D9}&documentTitle=20222-182305-01>.

⁴ 2021 Report, Quarterly Update – May 2022 (May 2022 Update). May 2, 2022. Accessed at: <https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={80B58680-0000-C21D-8924-5FDD672661CF}&documentTitle=20225-185467-01>.

The relevant portions of the 2021 HCA Order listed the following requirements for Xcel's 2021 Report (as corrected by the Erratum Notice):

2. For future HCA reports, Xcel must continue to comply with ordering paragraph 8 of the 2020 HCA Order, which reads:
Xcel's future HCA reports must be detailed enough to provide developers with a reliable estimate of the available level of hosting capacity at the feeder and sub-feeder at the time of submittal of the report to the extent practicable. The information should be sufficient to provide developers with a starting point for interconnection applications.
3. Xcel must fully comply with the requirements of ordering paragraph 15 of the 2020 HCA Order and publish all criteria violation on the map by May 2022.
4. Xcel must perform an HCA for load and file the analysis by November 2022.
5. The Commission directs that stakeholders workshops be held that provide for proposals put forward by stakeholders to incorporate the HCA into the interconnection process; the workshops will be convened by the Distribution Generation Work Group and facilitated by Commission staff. The Commission delegates administrative authority to the Executive Secretary to set schedules and timelines. Xcel shall, in collaboration with stakeholders, identify which priorities should be addressed first. For the priorities, stakeholders shall discuss the costs and benefits. Once complete, Xcel shall use the resulting information to develop a cost-benefit analysis and timelines for the priorities. The Company shall provide this information within 120 days after the workshops conclude, or in the alternative, a status update and revised timeline for providing this timeline.
6. Xcel must conduct a benefit-cost analysis of the Company's proposed Path 1 and Path 2 improvements of its hosting capacity analysis in any future cost recovery filing. This analysis should clearly indicate which improvements are incremental to any existing and planned grid modernization proposals, such as Xcel's ongoing Advanced Distribution System Management project. Additionally, this analysis should include a discussion of revenue generation from beneficiaries of any improvements.
7. Xcel must exclude its hosting capacity analysis costs from its next rate case if the Company requests recovery of its HCA costs through its next Transmission Cost Recovery Rider Petition.

8. Xcel must separately develop a proposal to implement the Fast Track Supplemental Review Screen (FTSRS) Use Case in the next hosting capacity analysis report consistent with the Commission's long-term goal of the hosting capacity analysis and must conduct a benefit-cost analysis of the FTSRS Use Case.
9. Xcel must develop, following a Commission Determination of the Use Case for future HCA reports, a corresponding data validation plan for HCA results, solicit written feedback from stakeholders on the draft plan, and then include the final plan in the next HCA report. (2020 HCA Order, ordering paragraph 17).
10. Xcel must collaborate with stakeholders in evaluating the costs and benefits associated with a hosting capacity analysis able to achieve the following objectives (2020 HCA Order, ordering paragraph 4):
 - a. Remaining an early indicator of possible locations for interconnection;
 - b. Replacing or augmenting initial review screens and/or supplemental review in the interconnection process; and/or
 - c. Automating interconnection studies.
11. Xcel must continue working with stakeholders to identify opportunities to integrate the HCA and the MN DIP pre-application and screening processes in future iterations of the HCA. (2020 HCA Order, ordering paragraph 5).
12. The Commission adopts the long-term goal to use the hosting capacity analysis in the interconnection process's fast track screens. Xcel should work with stakeholders to refine the hosting capacity analysis. Xcel may seek cost and timing clarification from the Commission. (2020 HCA Order, ordering paragraph 9).
13. Xcel must provide, in its 2021 HCA Report, options for monthly HCA updated, including cost estimates.

On February 7, 2022, the Commission issued its *Notice of Comment Period* (Notice). The Notice requested comments on the 2020 Report regarding the following topics:

- Does Xcel Energy's 2021 Hosting Capacity Analysis Report achieve the requirements outlined in the Commission's July 31, 2020 Order,⁵ the Commission's November 9, 2021 Order[footnote omitted], and Minn. Stat. §216B.2425, Subd. 8?
- Are there other issues or concerns related to this matter?

⁵ *In the Matter of Xcel's 2019 Hosting Capacity Analysis Report*. ORDER ACCEPTING REPORT AND SETTING FURTHER REQUIREMENTS (2020 HCA Order). Docket No. E002/M-19-685. July 31, 2020. Accessed at: <https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={C06CA673-0000-C714-93E9-DFED768388A6}&documentTitle=20207-165472-01>.

II. SUMMARY

Xcel provided an overview of the improvements made to the HCA in the 2021 Report:

- Xcel began updating the HCA on a quarterly basis starting in August 2021, and will publish quarterly HCA updates on each November 1, February 1, May 1, and August 1;
- Xcel used DRIVE version 3.0 for the 2021 HCA;
- Xcel lowered the threshold for a change in aggregate DER generation from 500 kW to 100 kW;
 - o Feeders are updated if new DER installations amount to 100 kW or greater on a feeder and are in service at the time of the analysis
 - o Xcel updated 263 and 286 feeder models in the August and November 2021 HCAs
- Xcel used actual daytime minimum load (DML) values for those feeders that have reliable Supervisory Control and Data Acquisition (SCADA) data;
- Xcel used the Unintentional Island threshold (an 80 percent generation to load threshold, which aligns with Xcel's current interconnection studies);
- Xcel replaced all instances where Unintentional Island was the limiting factor with the next applicable limit, as feeders with Installed Voltage Supervisory Reclosing (VSR) negates the Unintentional Islanding limit;
 - o 115 feeders have confirmed VSR installed
- Xcel changed the power factor for DER sites from 98 percent to 95 percent, consistent with Xcel's interconnection studies; and
- Xcel's hosting capacity map pop-up boxes and Feeder Tabular Results include for each feeder the most recent date when data was updated (data cutoff date) and indicate what was the most recent quarterly report where that data was updated.

Xcel's November 2021 HCA results show that 91 feeders have zero maximum hosting capacity, compared to 95 feeders in the August 2021 HCA update and 122 feeders in the November 2020 HCA. Out of these 95 feeders, 65 have at least one MW of existing DER installed and operational. The February 2022 Update shows a decrease in the number of feeders with zero maximum hosting capacity from 91 to 61,⁶ and the May 2022 Update shows a slight increase in this number from 61 to 65.⁷

Xcel's heat map and Tabular Results provide the amount of hosting capacity available without conducting any mitigations, which could improve the hosting capacity and allow higher levels of DER to be interconnected.

Xcel's November 2021 HCA reflects installed DER generation and feeder topology at the time the analysis began (July 1, 2021) and does not account for DER projects that are in the interconnection queue.

⁶ February 2022 Update, at 2.

⁷ May 2022 Update, at 2.

Xcel also provided a conceptual, high-level estimate of the costs of providing monthly HCA updates and a timeline to do so: the total conceptual cost estimate is \$1.7 million to \$3.5 million, and incremental ongoing annual costs for engineering resources of \$375,000 to \$500,000, which could be implemented in approximately 15 to 18 months from project initiation. The Department notes that this is identical to Xcel's conceptual, high-level estimate and timeline provided in its 2020 Report Reply Comments.⁸

Since there are no specific rules promulgated for Minn. Stat. §216B.2425, subd. 8 (the Statute), the Minnesota Department of Commerce, Division of Energy Resources (Department) examined Xcel's 2021 Report, the February 2022 Update, and the May 2022 Update according to the Statute and the 2020 and 2021 HCA Orders.

The Department offers the following comments in response to the Commission's Notice.

III. DEPARTMENT ANALYSIS

A. NOTICE TOPIC #1

As noted above, the first topic open for comment is whether the 2021 Report achieves the requirements outlined by the Statute and the 2020 and 2021 HCA Orders. The Department's analysis relies on the Statute and the 2020 and 2021 HCA Order to determine whether the 2021 Report is in compliance.

The Department notes that Xcel's 2021 Report is bifurcated into a Compliance Filing that offers a summary of the 2021 Report, and the actual 2021 HCA, which is Attachment A of the 2021 Report. While there are additional attachments in the filing, the two main substantive elements of the filing are the Compliance Filing and Attachment A. Attachment B contains the Feeder Tabular Results of Xcel's November 2021 HCA. Attachment C contains the Sub-Feeder Tabular Results. Attachment D contains a compliance matrix.

The table below summarizes whether Xcel complied with the Statute and the 2020 and 2021 HCA Orders.

Table 1: Compliance Review of the 2021 Report

Authority	Description	Location	Complied?
<i>Minn. Stat. § 216B.2425, subd. 8</i>			

⁸ 2020 Report, Xcel Reply Comments, at 12. May 21, 2021. Accessed at: <https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={60C79079-0000-CC1A-B314-AB76C0E838EA}&documentTitle=20215-174405-01>.

Substantive Requirement	Xcel shall conduct a distribution study to identify interconnection points on its distribution system for small-scale distributed generation resources and shall identify necessary distribution upgrades to support the continued development of distributed generation resources.	Report, Sec. I.B, at 6	Yes ⁹
Procedural Requirement	Xcel shall include the study in its report required under subdivision 2.	n/a	Yes ¹⁰
<i>2020 HCA Order</i>			
Ordering Paragraph 4	Collaborate with stakeholders in evaluating costs and benefits associated with hosting capacity analysis able to achieve the following objectives: a. Remaining an early indicator of possible locations for interconnection; b. Replacing or augmenting initial review screens and/or supplemental review in the interconnection process; and/or c. Automating interconnection studies.	See footnote 11	Yes ¹¹
Ordering Paragraph 5	Xcel is directed to continue working with stakeholders to identify opportunities to integrate the HCA and the MN DIP pre-application and screening processes in future iterations of the HCA.	See footnote 11	Yes
Ordering Paragraph 8	Xcel's future HCA reports must be detailed enough to provide developers with a reliable estimate of the available level of hosting capacity at the feeder and sub-feeder levels at the time of submittal of the report to the extent practicable. The information should be sufficient to provide developers with a starting point for interconnection applications.	Atts. A, B, and C	Yes
Ordering Paragraph 9	The Commission adopts a long-term goal to use the hosting capacity analysis in the interconnection process's fast track screens. Xcel should work with stakeholders to refine	See footnote 11	Yes

⁹ Xcel identified and included 1,053 feeders in the 2021 Report, while excluding 115 feeders from the public "heat map" based on confidentiality and security concerns. The Department notes that Xcel identified and included 1,050 feeders in the 2019 and 2020 Reports.

¹⁰ The statute refers to the Biennial Transmission Project Report. The Commission has previously determined that Xcel's HCA Report can be filed separate from the Biennial Transmission Project Report. IN THE MATTER OF XCEL'S 2017 HOSTING CAPACITY STUDY. *Order Accepting Study and Setting Further Requirements*. Docket No. E002/M-17-777. July 19, 2018. Order Point No. 8. Accessed at:

<https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={D048B364-0000-C110-B912-A75F943579A1}&documentTitle=20187-145039-01>.

¹¹ See Xcel Letter – 2022 Workshop Plan. Docket Nos. E002/M-21-767, E002/M-20-812, and E999/CI-16-521. Accessed at: <https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={80D40A80-0000-C517-9382-CD69DBBC934A}&documentTitle=20224-184579-01>.

	the hosting capacity analysis. Xcel may seek cost and timing clarification from the Commission.		
Ordering Paragraph 11	In its 2020 HCA Report, Xcel must, to the extent practicable, include a unique name or number for each line segment in the maps' pop-up boxes.	Att. C	Yes
Ordering Paragraph 15	In its 2020 HCA tabular report, Xcel must publish the criteria violation and corresponding hosting capacity values for each HCA model run and location, and map with appropriate caveats.	Att. C, February 2022 Update, and HCA Map ¹²	Yes
Ordering Paragraph 17	Following a Commission determination of the Use Case for future HCA reports, Xcel must develop a corresponding data validation plan for HCA results, solicit written feedback from stakeholders on the draft plan, and then include the final plan in the next HCA report.	Att. A, at 19	Yes
<i>2021 HCA Order</i>			
Ordering Paragraph 2	See 2020 HCA Order, Ordering Paragraph 8	Atts. A, B, and C	Yes
Ordering Paragraph 3	Xcel must fully comply with the requirements of ordering paragraph 15 of the 2020 HCA Order and publish all criteria violation on the map by May 2022.	HCA Map	Yes
Ordering Paragraph 4	Xcel must perform an HCA for load and file the analysis by November 2022.	Att. A, at 8 – 9.	n/a
Ordering Paragraph 5	The Commission directs that stakeholder workshops be held that provide for proposals put forward by stakeholders to incorporate the HCA into the interconnection process; the workshops will be convened by the Distributed Generation Work Group and facilitated by Commission staff. The Commission delegates administrative authority to the Executive Secretary to set schedules and timelines. Xcel shall, in collaboration with stakeholders, identify which priorities should be addressed first. For the priorities, stakeholders shall discuss the costs and benefits. Once complete, Xcel shall use the resulting information to develop a cost-benefit analysis and timelines for the priorities. The	See footnote 11	Yes

¹² Xcel HCA Map accessed at:
<https://xeago.maps.arcgis.com/apps/webappviewer/index.html?id=a04c42c922664381a2d35ba12305eb2e>.

	Company shall provide this information within 120 days after the workshops conclude, or in the alternative, a status update and revised timeline for providing this timeline.		
Ordering Paragraph 6	Xcel must conduct a benefit-cost analysis of the Company's proposed Path 1 and Path 2 improvements of its hosting capacity analysis in any future cost recovery filing. This analysis should clearly indicate which improvements are incremental to any existing and planned grid modernization proposals, such as Xcel's ongoing Advanced Distribution System Management project. Additionally, this analysis should include a discussion of revenue generation from beneficiaries of any improvements.	n/a	n/a
Ordering Paragraph 7	Xcel must exclude its hosting capacity analysis costs from its next rate case if the Company requests recovery of its HCA costs through its next Transmission Cost Recovery Rider Petition.	n/a	Yes ¹³
Ordering Paragraph 8	Xcel must separately develop a proposal to implement the Fast Track Supplemental Review Screen (FTSRS) Use Case in the next hosting capacity analysis report consistent with the Commission's long-term goal of the hosting capacity analysis and must conduct a benefit-cost analysis of the FTSRS Use Case.		No
Ordering Paragraph 9	See 2020 HCA Order, Ordering Paragraph 17	Att. A, at 19	Yes
Ordering Paragraph 10	See 2020 HCA Order, Ordering Paragraph 4	See footnote 11	Yes
Ordering Paragraph 11	See 2020 HCA Order, Ordering Paragraph 5	See footnote 11	Yes
Ordering Paragraph 12	See 2020 HCA Order, Ordering Paragraph 9	See footnote 11	Yes
Ordering Paragraph 13	Xcel must provide, in its 2021 HCA Report, options for monthly HCA updates, including cost estimates.	Report, Sec. II, at 14 – 16.	Yes

¹³ The Department reviewed Xcel's 2021-2022 Transmission Cost Recovery Rider petition in Docket No. E002/M-21-814. HCA costs are not included in the petition.

The Department concludes that Xcel's 2021 HCA and related filings generally complies with the Statute and the 2020 and 2021 HCA Orders, with the exception of Ordering Paragraph 8 of the 2021 HCA Order.

The Department addresses this issue in the following subsection.

1. Xcel did not comply with Ordering Paragraph 8 of the 2021 HCA Order

Xcel did not comply with Ordering Paragraph 8 of the 2021 HCA Order: there is nothing in Xcel's HCA Report discussing the FTSRS Use Case, let alone a proposal to implement it nor a benefit-cost analysis (BCA) of the FTSRS Use Case.

The Department requests Xcel to explain why it did not comply with Ordering Paragraph 8 of the 2021 HCA Report in Reply Comments.

Due to the timing of the Commission's Agenda Meeting for the 2020 Report (September 30, 2021) and the due date for the 2021 Report (November 1, 2021), the Department suspects that Xcel did not have time to carry out this Ordering Paragraph. However, the 2021 Report omits any reference to the FTSRS Use Case whatsoever, despite detailing in several other instances the verbal decisions at the September 30, 2021 Agenda Meeting for the 2020 Report.

In the Department's view, Xcel is not excused or relieved of the obligation to comply with the Commission's September 30, 2021 verbal decisions at the Agenda Meeting for the 2020 Report. If the Company was not able to develop a proposal to implement the FTSRS Use Case and conduct a BCA in time for the November 1, 2021 filing, it should have explicitly addressed this issue in the 2021 Report.

If practical, the Department requests that Xcel develop a proposal to implement the FTSRS Use Case and conduct a BCA in Reply Comments. If not practical, the Department requests that Xcel provide a timeline to supplement its 2021 HCA Report with the information required by Ordering Paragraph 8 of the 2021 HCA Order in Reply Comments.

Xcel stated the following in the 2021 HCA Report:¹⁴

Once there is more Commission direction and certainty on the Use Case the Company should either explore more or implement, we will need to initiate a standard project process that starts with a detailed requirements phase, followed by the design phase, and then progression to development and testing, and finally, the project going live. Until we go through the detailed requirements phase for the specific solution the Commission directs, we will not be able to provide a more specific cost estimate.

¹⁴ 2021 Report, at 16.

There is or should be no ambiguity of the Commission's direction and certainty as it relates to the FTSRS Use Case.

The Commission's 2020 HCA Order established the long-term goal to use the HCA in the interconnection process's fast track screens, and Xcel affirmed that the FTSRS Use Case is the use case that most closely resembles the Commission's long-term goal for the HCA.¹⁵ The Commission re-affirmed this goal in Ordering Paragraph 12 of the 2021 HCA Order and Ordering Paragraph 8 explicitly directs Xcel to develop a proposal to implement the FTSRS Use Case and conduct a BCA for the 2021 HCA Report.

The Department recommends that the Commission find that Xcel Energy's 2021 Hosting Capacity Analysis Report does not achieve the requirements outlined in the Commission's July 31, 2020 Order, the Commission's November 9, 2021 Order, and Minn. Stat. § 216B.2425, subd. 8 until Xcel complies with Ordering Paragraph 8 of the Commission's November 9, 2021 Order.

B. NOTICE TOPIC #2

The second Notice topic asks if there are any other issues or concerns related to this matter.

The Department reviewed Xcel's April 8, 2022 letter regarding the 2022 Workshop Plan and understands it to be in furtherance of Ordering Paragraph 5 of the 2021 Order. The Department was unable to attend the April 26, 2022 and May 24, 2022 workshops but plans on viewing the recordings of each when made available and participate in future workshops as time and resources allow.¹⁶

At this time, the Department does not have any other concerns related to this matter.

IV. DEPARTMENT RECOMMENDATIONS

The Department appreciates the opportunity to comment on Xcel's 2021 Hosting Capacity Analysis Report.

The Department requests the following additional information from Xcel:

- 1. The Department requests Xcel to explain why it did not comply with Ordering Paragraph 8 of the 2021 HCA Report in Reply Comments.**

¹⁵ See Department Supplemental Comments in Docket No. E002/M-20-812, at 4-5. July 26, 2021. Accessed at: <https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={C0B2E47A-0000-C915-8B3E-0E3C7575AF20}&documentTitle=20217-176498-01>.

¹⁶ Xcel Letter – Presentation and Recording of April 26, 2022 Stakeholder Workshop Distribution System. Dated May 12, 2022. Accessed at: <https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={6002BA80-0000-C717-B5AE-0FAD8222DFC0}&documentTitle=20225-185712-01>.

- 2. If practical, the Department requests that Xcel develop a proposal to implement the FTSRS Use Case and conduct a BCA in Reply Comments. If not practical, the Department requests that Xcel provide a timeline to supplement its 2021 HCA Report with the information required by Ordering Paragraph 8 of the 2021 HCA Order in Reply Comments.**

The Department makes the following recommendation:

The Department recommends that the Commission find that Xcel Energy's 2021 Hosting Capacity Analysis Report does not achieve the requirements outlined in the Commission's July 31, 2020 Order, the Commission's November 9, 2021 Order, and Minn. Stat. § 216B.2425, subd. 8 until Xcel complies with Ordering Paragraph 8 of the Commission's November 9, 2021 Order.

/xx

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-21-767

Dated this **25th** day of **May 2022**

/s/Sharon Ferguson

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