

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

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Chair
Vice-Chair
Commissioner
Commissioner
Commissioner

In the Matter of Northern States Power
Company d/b/a Xcel Energy's Petition for
Approval of the Transmission Cost Recovery
Rider Revenue Requirements for 2021–2022,
and the Resulting Adjustment Factors by
Customer Class

DOCKET NO. E-002/M-21-814

**COMMENTS OF THE OFFICE OF
THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Comments in response to the Commission’s August 22, 2022 Notice of Comment Period on Xcel Energy’s (“Xcel” or “the Company”) petition for approval of Transmission Cost Recovery Rider (“TCR Rider”) revenue requirements and adjustment factors for 2021–2022. Xcel seeks permission to recover the costs of several new grid-modernization investments through the TCR Rider, costs that the Company expects to grow to over \$500 million by 2026. Before greenlighting rider recovery of these substantial investments, the Commission should impose several conditions to protect ratepayers from potential cost overruns and ensure that they receive the benefits that Xcel claims these investments will deliver.

BACKGROUND

I. PROCEDURAL HISTORY

On November 1, 2019, Xcel filed a rate case and an integrated distribution plan (“IDP”). Both filings included an Advanced Grid Intelligence and Security (“AGIS”) initiative that the

Company projected would cost \$734 million between 2020 and 2029.¹ Xcel later withdrew the rate case but proceeded with its IDP request to certify the AGIS investments under Minn. Stat. § 216B.2425 as “investments . . . necessary to modernize the transmission and distribution system.”² Certification is a prerequisite for including grid-modernization investments in a transmission-cost-recovery rider.³

In its 2020 IDP Order, the Commission certified two AGIS components—Advanced Metering Infrastructure (“AMI”)⁴ and Field Area Network (“FAN”).⁵ The Commission’s certification decision was expressly conditioned on “the recognition, and acceptance from Xcel, that all future cost recovery will be based upon the Company accomplishing Commission-approved metrics and performance evaluations for the certified projects.”⁶ Further, the Commission required Xcel to include with any future cost-recovery request “a proposal for specific metrics and evaluation methods, and a detailed plan describing how the company will maximize the benefits of the AGIS investments for ratepayers.”⁷

The Commission also outlined a two-pronged process for evaluating future requests for rider recovery of AGIS investments: (1) a preliminary Commission “scoping” decision on what procedure to use to evaluate the rider request and (2) a stakeholder process, led by the Minnesota

¹ *In the Matter of Xcel Energy’s Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request*, Docket No. E-002/M-19-666, Order Accepting Integrated Distribution Plan, Modifying Reporting Requirements, and Certifying Certain Grid Modernization Projects at 7 (July 23, 2020) [hereinafter “2020 IDP Order”].

² Docket No. E-002/M-19-666, Xcel 2019 IDP at 4 (Nov. 1, 2019).

³ See Minn. Stat. § 216.16, subd. 7b.

⁴ “AMI is the Company’s new metering solution – replacing our legacy Automated Meter Reading (AMR) system, which is being phased-out by our service provider – and will provide information that will interact with many of our other planned and future grid modernization components.” Xcel Petition, attach. 4 at 2.

⁵ “FAN is the communication network that will enable secure and efficient two-way communication of information and data between the new AMI meters at customers’ homes and businesses and other future field devices and the Company’s backoffice systems.” *Id.*

⁶ 2020 IDP Order at 16.

⁷ *Id.*

Department of Commerce (“Department”), to investigate performance metrics and other conditions to apply to rider recovery.⁸

On August 28, 2020, Xcel filed a procedural proposal in anticipation of seeking rider recovery of AMI and FAN costs in a filing later that year.⁹ The Company, however, ultimately decided not to file a TCR Rider petition in 2020, citing the “many active dockets right now and a lot of review work underway for our regulators and stakeholders.”¹⁰

On December 1, 2020, the Department filed its *Report on Methods for AMI and FAN Performance Evaluations, Metrics, and Customer Protections*, which incorporated feedback from stakeholders, including the OAG. The Department made several key recommendations, including:

1. That the Commission establish cost caps on rider recovery, with one possible basis being the costs Xcel projected for the AMI and FAN projects at the time of certification;
2. That the Commission establish performance metrics for the AMI and FAN projects prior to the start of cost recovery; and
3. That the Commission require that all revenues and cost savings from AMI and FAN investments accrue to Xcel’s customers.¹¹

On November 24, 2021, Xcel filed its current TCR Rider petition. The petition includes new costs for four grid-modernization projects previously certified by the Commission, the two largest of which are AMI and FAN.

On June 2, 2022, the Commission adopted a procedural agreement between Xcel and the Department that required Xcel to supplement the record with additional information about its planned AMI and FAN investments.

⁸ 2020 IDP Order at 16–17.

⁹ See *In the Matter of Xcel’s Procedural-Paths Filing for TCR Rider Recovery of Certified AGIS Projects*, Docket No. E-002/M-20-680, Xcel Filing (Aug. 28, 2020).

¹⁰ Docket No. E-002/M-20-680, Xcel Reply Comments at 3 (Oct. 30, 2020).

¹¹ *In the Matter of the Department Stakeholder Process Informing the Report on the Metrics, Performance Evaluation Methods, and Consumer Protection Conditions for Xcel Energy’s Advanced Metering Infrastructure and Field Area Network Projects*, Docket No. E-999/DI-20-627, Department Report at 32–33 (Dec. 1, 2020).

On August 17, 2022, Xcel made its supplemental filing.

II. XCEL'S TCR RIDER REQUEST

Xcel's petition seeks approval of a 2022 TCR Rider revenue requirement of \$104.5 million, \$41.9 million of which is attributable to AMI, FAN, and other AGIS investments.¹² Xcel projects that by 2024, the revenue requirement associated with these projects will grow to \$63.6 million, yielding total rider recovery of more than \$200 million for AGIS investments within the 2019–2024 period.¹³ In terms of direct capital investment, the Company projects investing capital of \$464.4 million in AMI and FAN alone in 2020–2026.¹⁴

Xcel states that AMI and FAN are needed because its current meters are approaching the end of their lives and need replacing, and also because customers and regulators are demanding more service offerings and increased functionality from the distribution grid. The Company claims that AMI, FAN, and other AGIS projects will deliver numerous benefits, both quantifiable and unquantifiable. Xcel included a cost–benefit analysis of AMI and FAN with its petition that compares the costs of the projects to their quantifiable benefits.¹⁵ That analysis showed a benefit-to-cost ratio of 1.01 under baseline assumptions,¹⁶ meaning that, under Xcel's own assumptions, the quantifiable benefits of AMI and FAN barely outweigh the costs. The Company updated the cost–benefit analysis in its supplemental filing and found a slightly improved benefit-to-cost ratio of 1.08 in the base scenario.¹⁷

¹² See Xcel Petition, attach. 4G (AGIS rate impact analysis).

¹³ See *id.*

¹⁴ Xcel Petition, attach. 4 at 55 tbls.1,2.

¹⁵ See Xcel Petition, attach. 4A.

¹⁶ Xcel Petition, attach. 4 at 59.

¹⁷ Xcel Supplement at 36.

Xcel identifies three categories of quantifiable benefits—capital, O&M, and other—that are included in its cost–benefit analysis. Table 1, below, sets forth the quantifiable benefits Xcel identifies for AMI¹⁸:

Table 1
Xcel-Identified Quantifiable AMI Benefits¹⁹

Capital Benefits	O&M Benefits	Other Benefits
• Distribution System Management Efficiency • Outage Management Efficiency • Avoided Meter Purchases • Avoided investment of an alternative meter reading system	• Avoided O&M Meter Reading Cost • Reduction in Field and Meter Services • Improved Distribution System Spend Efficiency • Outage Management Efficiency	• Reduction in Energy Theft • Reduced Consumption Inactive Premises • Reduced Uncollectible/Bad Debt • Reduced Outage Duration • Critical Peak Pricing • TOU Customer Price Signals • Reduced Carbon Dioxide Emissions

Xcel also identifies a fourth category of “qualitative” benefits whose economic impacts are difficult to quantify. Those benefits are set forth in the following table:

¹⁸ Xcel does not project that FAN will have benefits in its own right but claims that it is necessary to support AMI.

¹⁹ Xcel Petition, attach. 4 at 61–62.

Table 2
Xcel-Identified Qualitative AMI Benefits²⁰

- | |
|--|
| <ul style="list-style-type: none">• Improved customer choice and experience, leading to customer empowerment and satisfaction• Enhanced distributed energy resources (DER) integration• Environmental benefits of enhanced energy efficiency• Improved safety for customers and Company employees• Improvements to power quality |
|--|

With regard to performance metrics, Xcel asserts that the metrics it previously proposed in its certification petition remain reasonable and appropriate.²¹ The Company states, however, that it can also support many of the metrics the Department included in its December 2020 report.²² The full list of metrics Xcel that supports are set forth in Attachment 4 to its TCR Rider petition at pages 90 to 97.

ANALYSIS

Grid-modernization investments like AMI and FAN represent a new regulatory paradigm: Rather than being essential to delivering basic utility service, the value proposition of AMI and FAN depends on these investments' ability to deliver operational efficiencies along with new features and applications for customers. Furthermore, because these are new technologies, there is a greater risk that unforeseen issues may cause their costs to exceed Xcel's estimates. Accordingly, before allowing Xcel to begin recovering AMI and FAN costs, the Commission should impose at least three conditions to protect ratepayers. First, the Commission should limit rider recovery to the costs that Xcel has forecasted. Second, the Commission should require Xcel to track the quantifiable benefits of AMI and FAN to ensure that those benefits are realized. And

²⁰ *Id.* at 67–70.

²¹ *Id.* at 88.

²² *Id.* at 89.

finally, the Commission should require the Company to implement a mechanism to expeditiously return these benefits to ratepayers.

I. THE COMMISSION SHOULD CAP RIDER RECOVERY OF AMI AND FAN AT XCEL'S INITIAL ESTIMATES.

In the Department's stakeholder process in docket 20-627, the OAG recommended that the Commission cap rider recovery based on Xcel's initial estimate of AMI and FAN costs, as it has done for other TCR Rider projects.²³ The OAG continues to believe that a cost cap is needed to protect ratepayers if Xcel is allowed rider recovery of these investments.

The TCR Rider gives a utility the extraordinary ability to charge ratepayers for transmission facilities and certain distribution facilities before they are fully in service. The rider also employs an annual "true-up" process that allows charges to be increased if actual costs during the previous year were higher than projected. A utility thus has less incentive to contain the costs of projects being recovered through the rider, since—without a cap on recovery—any overruns can be recovered expeditiously. For these reasons, in 2010, the Commission adopted a cap for TCR Rider projects:

[T]he Commission finds that TCR project cost recovery through the rider should be limited to the amount of the initial cost estimates at the time the projects are approved as eligible projects, with the opportunity for the Company to seek recovery of excluded costs on a prospective basis in a subsequent rate case. A request to allow cost recovery for project costs above the amount of the initial estimate may be brought for Commission review only if unforeseen or extraordinary circumstances arise on a project.²⁴

²³ See Docket No. E-999/DI-20-627, OAG Comments at 15–16 (Oct. 16, 2020).

²⁴ *In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of a Modification to Its TCR Tariff, 2010 Project Eligibility, TCR Rate Factors, Continuation of Deferred Accounting and 2009 True-up Report*, Docket No. E-002/M-09-1048, Order Approving 2010 TCR Project Eligibility and Rider, 2009 TCR Tracker Report, and TCR Rate Factors at 6 (Apr. 27 2010).

The Commission imposed a rider cap as recently as December 2021 for another of Xcel’s grid-modernization projects, the Advanced Distribution Management System (“ADMS”).²⁵ The Commission did so over Xcel’s opposition, rejecting the Company’s argument that these costs should not be capped because ADMS is a novel type of project whose costs are hard to predict.²⁶

Just as with ADMS, the Commission should cap rider recovery at Xcel’s initial estimates for AMI and FAN to enforce fiscal discipline and align the Company’s incentives with ratepayer interests. The cap should be applied separately each project and should also apply separately to O&M and capital costs based on Xcel’s estimates for each category. Doing so would hold the Company to its high-level estimate for each category and would incentivize it to control both types of costs, particularly O&M.

II. THE COMMISSION SHOULD REQUIRE XCEL TO TRACK THE PERFORMANCE OF AMI AND FAN TO ENSURE THAT THE QUANTIFIABLE BENEFITS ARE BEING REALIZED.

In docket 20-627, the OAG recommended requiring Xcel to report metrics that capture the quantifiable benefits that the Company has identified for AMI.²⁷ The OAG continues to support this recommendation.

The Commission’s 2020 IDP Order recognizes the necessity of establishing robust performance metrics for AMI and FAN investments. The Commission’s order expressly contemplates that “all future cost recovery will be based upon the Company accomplishing Commission-approved metrics and performance evaluations for the certified projects.”²⁸ The

²⁵ *In the Matter of Northern States Power Company d/b/a Xcel Energy’s Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2019 and 2020 and Revised Adjustment Factors*, Docket No. E-002/M-19-721, Order Authorizing Rider Recovery, Setting Return on Equity, and Setting Filing Requirements at 5 (Dec. 10, 2021).

²⁶ *Id.* at 5–6.

²⁷ OAG Comments at 10–11 (Oct. 16, 2020).

²⁸ 2020 IDP Order at 16.

order further emphasizes that the *purpose* of performance metrics is to “maximize the benefits of the AGIS investments for ratepayers.”²⁹

Xcel has identified numerous benefits of its AMI initiative, some that are quantifiable and some that are not. The Company uses the quantifiable benefits as inputs in its cost–benefit analysis to demonstrate the value of AMI and FAN. Xcel describes the quantifiable benefits in some detail at pages 63 to 67 of Attachment 4 to its Petition. The Company also provides additional information about its assumptions in the cost–benefit analysis included as Attachments A and B to its August 17, 2022 Supplement.³⁰ Since these quantifiable benefits underpin the business case for AMI and FAN, the Commission should require Xcel to track and report them annually in its TCR Rider filings. The Commission should also set a performance target for each benefit at the level assumed in the Company’s cost–benefit analysis.

For example, Xcel states that AMI “will provide the Company with information about the connectivity and workings of the distribution system” that will enable Xcel to “determine optimal timing for installation and replacement of distribution assets,” optimize inventory levels, “prioritize areas for investments in tap, transformer, and secondary wire replacement,” and determine the optimal replacement transformer for a particular location.³¹ Xcel therefore estimates that AMI meters will provide a one percent reduction in capital expenditures for Asset Health and Reliability projects and Capacity projects.³² The Commission should require Xcel to report its annual capital expenditures for Asset Health and Reliability projects and Capital projects, with a target of a one percent reduction in these expenditures.

²⁹ *Id.*

³⁰ The Company filed public versions of these attachments on October 14.

³¹ Xcel Petition, attach. 4 at 63.

³² *Id.*

Table 3 below lists AMI’s quantifiable benefits and specific targets based on the Company’s cost–benefit analysis:

Table 3
AMI Performance Targets Based on Quantifiable Benefits

Benefit	Metric	Target
Distribution Management Efficiency	Capital and O&M \$ spent on Asset Health and Reliability projects and Capacity projects	1% reduction ³³
Outage Management Efficiency	Capital and O&M \$ spent on storm recovery	10% capital reduction 0.1% O&M reduction ³⁴
Avoided Meter Purchases	\$ spent on meter replacement due to failure	None specified – requires clarification
Reduced Field and Meter O&M Expenses	Field trips due to customer equipment damage	50% reduction ³⁵
	Percent of disconnects and reconnects done remotely	70% of disconnects 95% of reconnects ³⁶
	“Ok on arrival” outage field visits	50% reduction ³⁷
	Field visits for voltage investigations	50% reduction ³⁸
Reduced Consumption on Inactive Meters	Usage on unassigned accounts	20% reduction ³⁹
Reduced Bad Debt Expense	\$ of bad-debt write-offs	8% reduction ⁴⁰
Reduced Theft/Meter Tampering	Increase in retail revenue	None specified – requires clarification
Load Flexibility Benefits	Customer energy price savings due to time-of-use (TOU) rates	None specified – requires clarification
	Avoided tons of CO ₂ emissions due to TOU rates	4,500 tons annual reduction ⁴¹

³³ *Id.*

³⁴ Xcel Supplement, attach. A at sheet “BenefitsInputs.”

³⁵ *Id.*

³⁶ *Id.* The OAG does not intend for these targets to prejudge the outcome of Xcel’s remote disconnect petition in docket 22-233. Depending on the outcome of that docket, they may need to be revised, as would the benefits attributable to AMI.

³⁷ *Id.*

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ *Id.* Because this benefit derives from the ability to remotely disconnect, the outcome of the remote disconnect proceeding in docket 22-233 may require a change to the target.

⁴¹ Xcel Petition, attach. 4 at 66.

Table 3
AMI Performance Targets Based on Quantifiable Benefits

Benefit	Metric	Target
	Customer savings due to critical peak pricing (CPP)	None specified – requires clarification

In Table 18 of Attachment 4 to its Petition, Xcel claims that the first two of these metrics are unrelated to AMI. On the first line of Table 18, for example, the Company lists the metric “Capex for Asset Health/Reliability, Capacity Projects,” and then in the “Notes” column claims that this benefit is “not related to AMI or FAN.” But if this benefit is not related to AMI or FAN, then Xcel should not have included it in the cost–benefit analysis of AMI. Since Xcel *did* include it in the cost–benefit analysis, the Company should be required to report on it as relevant to AMI.

In its August 17, 2022 Supplement, Xcel makes a related argument:

[W]hile we can and do report items such as distribution O&M and capital spending in rate cases and IDPs, the reporting we would do for this as it relates to our AMI and FAN implementation will be estimates that use the same basis as our benefit assumptions used in the CBA. We do not have specific tracking mechanisms, and even if it were practicable to establish specific tracking, doing so would be administratively burdensome.⁴²

The Company seems to be saying two somewhat inconsistent things here: First, Xcel appears to be saying that it has no way to prove that the benefits it assumes for AMI will materialize. The second thing the Company seems to be saying is these benefits may exist but that tracking them would be too administratively burdensome to be worth undertaking.

If there is no way to confirm or track the benefits assumed in Xcel’s cost–benefit analysis, then that analysis deserves little weight. And if the benefits do exist, they should be tracked to hold the Company accountable for delivering them. Put another way, the Commission should not approve a multimillion dollar grid-modernization initiative based on the mere hope that these

⁴² Xcel Supplement at 57.

benefits will accrue to ratepayers. Finally, even if certain cost reductions are impacted by multiple factors such that AMI's individual impact cannot be isolated, it is still worth tracking those costs and reporting them in TCR Rider dockets. Requiring Xcel to do so would keep it focused on delivering the promised benefits of AMI, and put the onus on the Company to explain why anticipated cost savings are not materializing.

For the foregoing reasons, the Commission should establish the targets shown in Table 3 above for the listed metrics. The OAG requests that, in reply comments, Xcel provide the specific reductions assumed in its cost-benefit analysis for those targets designated as "None specified – requires clarification."

III. THE COMMISSION SHOULD REQUIRE XCEL TO RETURN TO RATEPAYERS THE INCREMENTAL COST SAVINGS AND REVENUES FROM AMI AND FAN.

In docket 20-627, the OAG recommended that Xcel implement a mechanism to expeditiously flow the incremental cost savings and revenues of AGIS investments to ratepayers. The OAG continues to support this recommendation.

The benefits of AMI and FAN may take the form of not only cost savings, as discussed above, but also new sources of revenue. For example, there may be opportunities for Xcel to partner with other utilities and municipalities, share use of the FAN, and thereby receive additional revenues to offset its cost.⁴³ Since ratepayers are paying for AMI and FAN, they should receive its benefits whether they take the form of avoided costs or new revenues. These benefits should eventually flow to ratepayers in the form of lower base rates. However, changing base rates depends on Xcel filing a new rate case, which may not happen for several years. In the meantime, the Commission should require the Company to use the TCR Rider, through which Xcel recovers

⁴³ See Aclara, Four Trends in Utility Field Area Networks You Need to Know, <https://blog.aclara.com/four-trends-in-utility-field-area-networks-you-need-to-know/> (last visited Oct. 14, 2022).

AMI and FAN costs, to return any incremental cost savings or revenues attributable to those investments. This could be accomplished through the rider's annual true-up process, with cost savings or revenues included as a credit or offset in the Company's true-up filing.

CONCLUSION

For the reasons discussed in these Comments, the Commission should impose the following conditions on TCR Rider recovery of AMI and FAN costs:

1. Cap rider recovery of AMI and FAN at Xcel's initial estimates;
2. Require Xcel to track the quantifiable benefits of AMI and FAN to ensure that those benefits are realized; and
3. Require the Company to implement a mechanism to expeditiously return to ratepayers the incremental cost savings and revenues attributable to AMI and FAN.

Dated: October 17, 2022

Respectfully submitted,

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/s/ **Peter G. Scholtz**

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October 17, 2022

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Executive Secretary
Minnesota Public Utilities Commission
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Re: *In the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021–2022, and the Resulting Adjustment Factors by Customer Class*
MPUC Docket No. E-002/M-21-814

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Peter G. Scholtz**

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CERTIFICATE OF SERVICE

Re: *In the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021–2022, and the Resulting Adjustment Factors by Customer Class*
MPUC Docket No. E-002/M-21-814

I, JUDY SIGAL, hereby certify that on the 17th day of October, 2022, I e-filed with eDockets *Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Betsy	Engelking	betsy@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-814_M-21-814
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_21-814_M-21-814
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John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_21-814_M-21-814
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 5510212131	Electronic Service	Yes	OFF_SL_21-814_M-21-814
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