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October 6, 2017

VIA ELECTRONIC FILING

Mr. Daniel P. Wolf, Executive Secretary
MN Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: Minnesota Power's Petition for Approval of Affiliated Interests Between
ALLETE, Inc. and ALLETE Clean Energy
Docket No: E015/AI-17-304

Dear Mr. Wolf;

Please find attached for filing with the Minnesota Public Utilities Commission ("Commission") Minnesota Power's Reply Comment in the above-referenced Docket.

Please contact me at the number above if you have any questions regarding this filing.

Yours truly,

David R. Moeller

DRM:sr
Enc.

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

In the Matter of Minnesota Power's
Petition for Approval of Affiliated Interests
Between ALLETE, Inc. and ALLETE
Clean Energy

Docket No. E015/AI-17-304

REPLY COMMENTS

I. Overview

Minnesota Power (or “the Company”) submits these Reply Comments to the Minnesota Public Utilities Commission (“Commission”) in response to the Department of Commerce – Division of Energy Resources (“Department”) Initial Comments filed on September 12, 2017. On April 19, 2017, Minnesota Power, a division of ALLETE, Inc., (“ALLETE”), filed its affiliated interest Petition in order to obtain Commission approval to transfer the Bison 6 Large Generator Interconnection Agreement (“Bison 6 LGIA” or “LGIA”) per the assignment agreement that Minnesota Power has entered into with ALLETE Clean Energy, Inc. (“ALLETE Clean Energy”). The Bison 6 LGIA will be utilized by ALLETE Clean Energy in the development and interconnection of the Clean Energy #1 Wind Project in central North Dakota for which Xcel Energy has contracted for a 20-year Wind Power Purchase Agreement. Xcel Energy received approval from the Commission on September 1, 2017, in Docket No. E002/M-16-777 to enter into the power purchase agreement with ALLETE Clean Energy. If the Bison 6 LGIA assignment is not approved by the Commission both Minnesota Power and Xcel Energy ratepayers will not receive the benefits associated with ALLETE Clean Energy’s wind project.

In its Initial Comments, the Department stated that additional information is required in order for the Department to fully evaluate the reasonableness of the proposed affiliate transaction. Specifically, the Department requested Minnesota Power to provide in reply comments:

- transparent, quantified support for the total sales price of \$121,179;
- an explanation as to why it would be reasonable for Minnesota Power’s regulated operations to continue to bear the Bison 6 LGIA’s share of the 230 kV AC transmission

system's capital costs and the Center-Mandan upgrade costs after the Agreement's April 17, 2017 date of execution;

- an explanation as to why only the transmission cost component (40.26%) of the Tri-County substation cost is used to determine the one-time capital payment amount;
- delineation as to where in the petition the filing requirements outlined in Minn. Rule 7825.1800 are satisfied, provide any outstanding filing requirements, and/or request the Commission, with justification, to vary its rule;
- supplemental information (or agreements) filed in the record to commit that ALLETE Clean Energy is in full agreement, that ongoing costs include future capital expenditures undertaken to replace or refurbish existing transmission infrastructure;
- An explanation as to why it would be reasonable for MP's regulated operations to continue to bear the Bison 6 LGIA's share of the annual operating and maintenance costs associated with the 33-mile transmission system, on and after the sale of the Bison 6 LGIA to its affiliate ACE, should the Company advocate for use of an effective date other than the Agreement's execution date.

Minnesota Power transferring the LGIA to ALLETE Clean Energy will directly benefit Minnesota Power ratepayers through offsetting revenue requirements in Minnesota Power's Renewable Resources Rider, where the transmission lines connecting the Bison wind facilities are currently being recovered.¹ These two benefits will be: (1) the payment of \$121,179 from ALLETE Clean Energy to Minnesota Power as consideration for the LGIA and reimbursement for Minnesota Power's transmission study costs and transmission allocation from other Transmission Owners and other costs associated with the Bison 6 LGIA assignment, and (2) future cost reimbursement from ALLETE Clean Energy for shared use of Minnesota Power's 230 kV AC transmission system in North Dakota that is estimated to be around \$7.7 million of a one-time payment. Additionally, approval of the Bison 6 LGIA transfer to ALLETE Clean Energy allows utilization of the LGIA prior to its termination on February 4, 2018, resulting in the aforementioned financial benefits to Minnesota Power customers. Once terminated, the Bison 6 LGIA has no value of any type to Minnesota Power ratepayers or anyone. Through these Reply Comments,

¹ Minnesota Power is proposing to roll the Bison wind projects into base rates in the current rate case (Docket E015/GR-16-664). However, any additional benefits received from ALLETE Clean Energy would be passed through to customers through the Renewable Resources Rider to provide timely benefits to customers.

Minnesota Power provides the additional information requested by the Department in Initial Comments.

II. Reply Comments

- **Transparent, quantified support for the total sales price of \$121,179**

Minnesota Power based the \$121,179 sale price of the Bison 6 LGIA on two components. First, at the time of the assignment agreement, \$21,179 was the Bison 6 LGIA allocation amount of the actual study costs of the Bison 2-6 System Impact and Facility Study (“Bison 2-6 Study”). This amount was calculated based on Bison 6 LGIA’s pro rata share of generation capacity of the Bison 2 through 6 LGIAs. See DOC IR 1.1 Attachment which details the costs associated with the Bison 2-6 Study. This allocation calculation was updated in response to DOC IR 26 and now the Bison 6 LGIA allocation of the Bison 2-6 Study costs is \$22,601.

The remainder of the purchase price, \$100,000, encompassed Minnesota Power’s estimate to cover regulatory and other costs to Minnesota Power from entering into the assignment agreement. The estimate is based on regulatory assessments and other costs associated with similar dockets that garner significant regulatory scrutiny given the financial and affiliate relationships. There is no market mechanism to compare these regulatory and legal costs to.

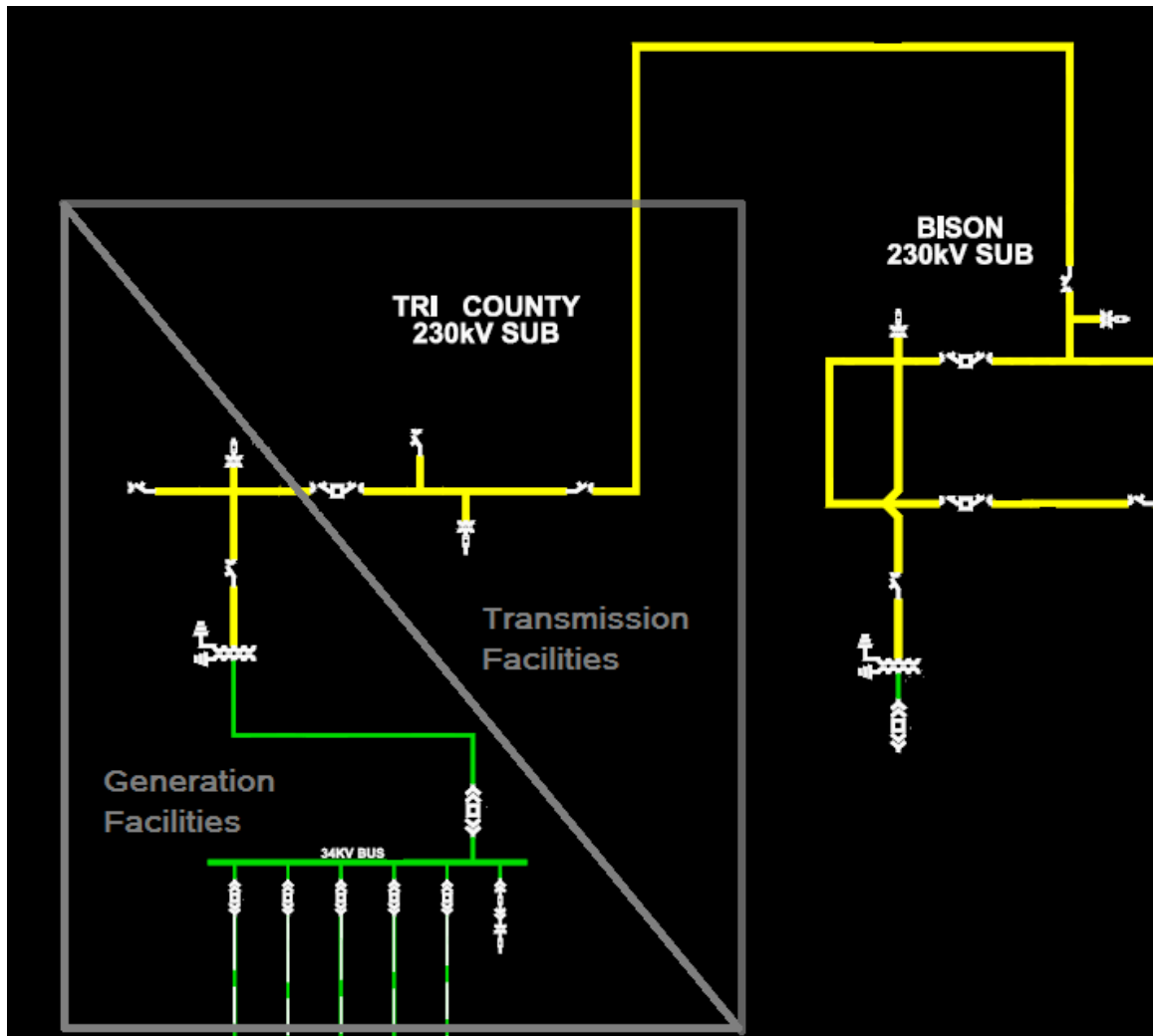
- **An explanation as to why it would be reasonable for Minnesota Power’s regulated operations to continue to bear the Bison 6 LGIA’s share of the 230 kV AC transmission system’s capital costs and the Center-Mandan upgrade costs after the Agreement’s April 17, 2017 date of execution**

Since the wind project that will utilize the Bison 6 LGIA has not been built yet, ALLETE Clean Energy has not begun using the Center-Mandan upgrade or Minnesota Power’s 230 kV AC transmission system. Therefore, it is not reasonable for ALLETE Clean Energy to be allocated costs until they are using the transmission facilities. The December 2019 date aligns with when the project would be in service and benefiting from the transmission lines.

It is reasonable ALLETE Clean Energy would not assume any costs until that time and because the wind project is subject to a number of contractual contingencies including approvals by FERC and this Commission. If the Commission requires the one-time capital related payment be made in April 2017 dollars the Company has calculated that it would be \$8,023,107.49 (rather than \$7,413,695.11 or an increase of (\$609,412.38). See Attachment 1.

- **An explanation as to why only the transmission cost component (40.26%) of the Tri-County substation cost is used to determine the one-time capital payment amount**

Through engineering analysis it was determined that of the entire substation facilities at Tri-County, 59.74% were related to the Minnesota Power generation facilities and that 40.26% were related to transmission facilities. ALLETE Clean Energy and Minnesota Power should split the costs related to existing transmission facilities based on each company's firm transmission capacity over the Transmission Provider's Interconnection Facilities (50.77% to ALLETE Clean Energy and 49.23% to Minnesota Power). Additional substation facilities needed for generation interconnection will be paid for in whole by the owner of the generation interconnection. The Tri County facilities located within the gray triangle on the upper right of the one-line show the transmission facilities while the gray triangle on the lower left show facilities related to Minnesota Power's existing generation.



- **Delineation as to where in the petition the filing requirements outlined in Minn. Rule 7825.1800 are satisfied, provide any outstanding filing requirements, and/or request the Commission, with justification, to vary its rule**

The Department believes that this transaction “is subject to Section 216B.50 and Minn. Rules 7825.1800.” Department Comments at 13. As noted in the Department’s comments, Minnesota Power disagrees with this interpretation since “Minnesota Power is not selling, acquiring, leasing or renting any plant as an operating unit or system.” Department Comments at 13. While the Department agrees that Minnesota Power is not selling its operating system because of the nature of the transaction the Department concludes: “the one-time capital-based payment is for use of the 230 kV AC Transmission system for a set period, therefore is not unlike ‘leasing or renting’ a portion of the system.” The

Department's extrapolation of the assignment of a transmission right under the Bison 6 LGIA into being "not unlike leasing or renting" is misplaced and would expand the scope of what would require prior Commission approval under Minn. Stat. § 216B.50 to any transaction that utilizes a Minnesota public utility's open access transmission system if the cost is greater than \$100,000.² Transmission rights do not provide the rights a lessee or renter would have if the entity had a property right in the facility.

For example, in the dispute over whether the Commission had jurisdiction over agreements between Minnesota Power and American Transmission Company ("ATC") regarding the development of the Arrowhead-Weston transmission line, the Commission relied upon the fact that ATC would physically lease upgrade substation capacity, facilities and equipment and use Minnesota Power's pre-existing right-of-way over the \$100,000 statutory threshold.³ In contrast, the Bison 6 LGIA does not provide ALLETE Clean Energy any real estate rights to Minnesota Power's facilities or right-of-way. The Department's interpretation of Minn. Stat. § 216B.50 could subject any federally regulated MISO (Midcontinent Independent System Operator) Interconnection Agreements executed by a Minnesota public utility⁴ to prior Commission approval since the value of the transmission rights is likely to be in excess of \$100,000 as well as the required security that is posted by a developer interconnecting to a public utility's transmission system. Furthermore, while Minn. Stat. § 216B.50 (Restrictions on Property Transfer and Merger) does not define property, Minn. Stat. § 216B.48 (Relations with Affiliated Interest) does specifically list property separately in what is covered: "No contract or arrangement, including any general or continuing arrangement, providing for the furnishing of management, supervisory, construction, engineering, accounting, legal, financial, or similar services, and no contract or arrangement for the purchase, sale, lease, or exchange of any **property, right, or thing**, or for the furnishing of any **service, property, right, or thing...**" (emphasis added). Here

² Minnesota Statutes Chapter 216B does not define "property" but Chapter 7825 is only applicable to "an operating unit or system" (Minn. Rules 7825.1600, subp. 8) and to property that is depreciated (Minn. Rules 7825.1800(C)).

³ In the Matter of Minnesota Power's Petition for Review of an Agreement Between Minnesota Power and American Transmission Company, Docket No. E015/PA-04-2020, Order dated June 1, 2005.

⁴ A link to the MISO Interconnection Agreements is available at <https://www.misoenergy.org/Library/Agreements/Pages/InterconnectionAgreements.aspx>.

Minnesota Power has contracted with ALLETE Clean Energy for a transmission right and not the sale or lease of property.⁵

In addition, while the Department cited the Commission's December 14, 1998 Order in Docket No. E017/PA-98-1345, in a veiled attempt to strengthen its jurisdiction argument, the Commission has recently determined that Minn. Stat. § 216B.50 did not apply to Xcel Energy's purchase of the Border Winds project in North Dakota.⁶ Likewise, here the transmission rights that are subject to this transaction are all based in North Dakota and not "in this state" as required by the direct language in Minn. Stat. § 216B.50 ("no public utility shall sell, acquire, lease, or rent any plant as an operating unit or system **in this state** for a total consideration in exceed of \$100,000") (emphasis added.).

- **Supplemental information (or agreements) filed in the record to commit that ALLETE Clean Energy is in full agreement, that ongoing costs include future capital expenditures undertaken to replace or refurbish existing transmission infrastructure**

ALLETE Clean Energy is in full agreement that ongoing costs include future capital expenditures undertaken to replace or refurbish existing transmission infrastructure.

- **An explanation as to why it would be reasonable for MP's regulated operations to continue to bear the Bison 6 LGIA's share of the annual operating and maintenance costs associated with the 33-mile transmission system, on and after the sale of the Bison 6 LGIA to its affiliate ACE, should the Company advocate for use of an effective date other than the Agreement's execution date**

⁵ The Department references the Company's FERC filing in FERC Docket EC17-109-000 and the description of the Bison 6 LGIA as an asset. However, FERC jurisdiction is broader for transmission rights and agreements in addition to the affiliate arrangement and FERC jurisdiction does not directly implicate state jurisdiction.

⁶ See In the Matter of the Petition of Xcel Energy for Approval of the Acquisition of 600 MW of Wind Generation, Docket No. E002/M-03-603 and In the Matter of the Petition of Xcel Energy for Approval of the Acquisition of 150 MW of Wind Generation, Docket No. E002/M-13-716, Order Approving Acquisitions with Conditions dated December 13, 2013. The Order at page 13 quoted Minn. Stat. § 216B.50 and concluded: "This statute does not apply to the Courtenay and Odell projects – which would not involve Xcel acquiring the wind farms themselves – the Border Wind project – which would not be located within Minnesota."

As discussed above in response to the timing of allocation issue, it is not reasonable for ALLETE Clean Energy to be allocated operations and maintenance costs until they are using the transmission facilities and benefiting from ongoing operations and maintenance work. The Department also listed a number of preliminary recommendations if the Commission approves the affiliate transaction. Minnesota Power agrees with the Department's recommendation that Taxes Other than Income Tax from Schedule O be included in operations and maintenance ("O&M") expenses. See Attachment 2. The Bison 6 LGIA portion of this annual O&M amount is \$3,350.77. The Department also requested that the issue of rounding the generation capacity for pro rata allocation purposes be consistently applied. For the O&M example previously provided in response to the Department's Information Request No. 12, the rounding issue was corrected. Cost sharing for Center-Mandan increases by \$20,055 to \$305,617 if the April 2017 timeframe is used. See Attachment 3.

III. Summary

Minnesota Power respectfully requests Commission approval of the assignment of the Bison 6 LGIA to ALLETE Clean Energy. The proposed affiliate transaction is reasonable, satisfies the Commission's public interest standard, and provides financial benefits to Minnesota Power ratepayers that would otherwise not be received if the LGIA remains in suspension status through February 4, 2018. Minnesota Power appreciates the opportunity to provide reply comments and looks forward to working with Commission Staff, the Department, and other stakeholders throughout the remainder of the regulatory review process.

Dated: October 6, 2017

Respectfully submitted,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, flowing style.

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Third Party Bison 6 Cost Allocation

In Service Date	Existing Facilities Tri-County Substation	MP Base Case	
		Bison 1-3 and Bison 5 at at Bison. Bison 4 and Bison 6 at Tri- County	
9/23/2010	Tri-County 230/34.5 Bison 4 Sub: 3021	2,466,203.75	
6/24/2014	230kV Tri-County-Bison Line #103: 3503	7,176,688.16	
	Total	9,642,891.90	
9/23/2010	Square Butte 230 kV(East) Bison 1 Addition: 3020	1,522,948.61	
11/15/2012	PH 1 Group 3, Bison Sub Cap Bank	512,818.60	
7/27/2012	Bison 2 Sub	486,840.07	
6/25/2014	Bison-Substation for Bison 3 Wind	1,083,221.53	
6/25/2014	Bison 4 Sub	1,485,622.76	
9/23/2010	230 kV Bison To Square Butte Line #84: 3581	9,944,616.13	
9/23/2010	Bison 1 230/34.5 KV SUB: 3009	2,798,891.93	
		OCLD =	17,834,959.61
		ITPUC =	105.6
		IC =	602.2
	ITPUCO = [ITPUC/IC]*OCLD (Bison Sub)		3,127,485.44
	Tri-County Substation		9,642,891.90
	Tri-County Substation (Third Party)		4,895,622.04
		ITPUC =	105.6
		IC =	208
	Total cost to ACE of existing facilities		8,023,107.49
	Total Transmission Related Cost for Third Party Interconnection		8,023,107.49

NOTE:

1. These costs only represent cost allocation for Transmission assets. No generation assets are included.
2. Costs for Tri-County based on the original cost less depreciation through April 2017.
3. The cost of the Center-Mandan upgrade is not included in this estimate and will be provided in a separate estimate.
4. Assumes the following transmission capacity requirements, actual requirements will be determined by what is specified in LGIA:

Bison 1:	81.8 mws
Bison 2-3:	105 mws
Bison 4:	102.4 mws interconnecting at Tricounty
Bison 5:	102.4 mws
Bison 6:	105.6 mws interconnecting at Tricounty

Third Party O&M Cost Allocation = (ITPUC (Tri County)/IC (Tri County)) X (projected O&M expense for AC System / Total AC Transmission Line Miles) X (Line miles - Tri County to Bison)
+ (ITPUC (Bison & Sq Butte)/IC (Bison & Sq Butte)) X (projected O&M expense for AC System / Total AC Transmission Line Miles) X (Line miles - Bison to Squarre Butte)

ITPUC = An Individual Third-Party User's total firm transmission capacity over Transmission Provider Interconnection Facilities

IC = Total Interconnection Customers' firm transmission capacity over the Transmission Provider's Interconnection Facilities, including both existing Interconnection Customer(s) firm transmission capacity and any new Interconnection Customer firm transmission capacity

Year	Total O&M Allocated to AC Transmission System	AC Transmission Line Miles	O&M Cost / Line Mile	
2016 (True Up posted 06/2017)	\$ 21,831,914	2,303	\$ 9,481	average O&M annual cost per line mile

Line Miles - Tri County to Bison	Bison 6 LGIA Cost Allocation Percentage (ITPUC/IC) 105.6/208	O&M Cost / Line Mile	Annual Estimated Third Party O&M*
11	50.77%	\$ 9,481	\$ 52,805

Line Miles - Bison to Square Butte	Bison 6 LGIA Cost Allocation Percentage (ITPUC/IC) 105.6 / 602.2	O&M Cost / Line Mile	Annual Estimated Third Party O&M*
22	17.54%	\$ 9,481	\$ 36,827
O&M Tri-County to Bison		\$	52,805
O&M Bison to Square Butte		\$	36,827
Total Estimated O&M Tri-County to Square Butte		\$	89,633

- Notes:
1. Total 'O&M Allocated to AC Transmission System' values as reported on MP Attachment O, which is used to determine Transmission revenue requirements
 2. ' Total O&M Allocated to Transmission System' is the current year's budgeted O&M amount allocated to AC Transmission system as reported on Attachment O
 3. This example illustrates the O&M costs allocated to a Third Party for a portion of the O&M for Bison and Square Butte Substations and the Bison To Square Butte Transmission line.
 4. A trueup will be performed using the same methodology after actual O&M expenses are known and the difference between estimated and actual costs will either be refunded to the Third Party or collected from the Third Party
 5. AC Transmission Line Miles taken from the 2016 FERC Form 1 Page 422

Third Party Center-Mandan Cost Allocation = $\frac{\text{Generating Capacity Bison 6}}{\text{Generating Capacity CE1 + Oliver County + Bison}}$

X

Total MP Center Mandan Cost Allocation

	Total Cost less depreciation	MP Allocation	MP Cost Allocation
Total Center Mandan Costs Assigned to MP	\$2,028,183.06		<u>2,028,183.06</u>
Total MP Cost Allocation			2,028,183.06
Generating Capacity - Bison 6			105.6 mw
Generating Capacity - Oliver County & Bison			<u>700.8 mw</u>
Third Party Share			15.07%
Third Party Contribution to Center-Mandan upgrade - including Oliver County and Bison			\$305,616.63 (= 15.07% x \$ 2,028,183)

Wind Project	Generator Output
Oliver County 1	50.6
Oliver County 2	48
Bison 1	81.8
Bison 2	105
Bison 3	105
Bison 4	102.4
Bison 5	102.4
Bison 6	<u>105.6</u>
700.8 Total Wind Output - Oliver County and Bison	

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **6th** day of **October, 2017**, she served Minnesota Power's Reply Comments in **Docket No: E015/AI-17-304** on the Minnesota Public Utilities Commission and the Office of Energy Security via electronic filing. Persons on the attached Official Service List were served as requested.



Susan Romans

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	Yes	OFF_SL_17-304_AI-17- 304
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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