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File #: 160549

April 20, 2015

**VIA HAND DELIVERY**

Rosemary Chiavetta, Secretary  
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Harrisburg, PA 17105-3265

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**Re: Duquesne Light Company Seamless Moves and Instant Connects Plan**  
**Docket No. M-2014-2401127**

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's ("Duquesne Light") Revised Plan Regarding Implementation of Seamless Moves and Instant Connects in the above-referenced proceeding. Copies will be provided as indicated in the Certificate of Service.

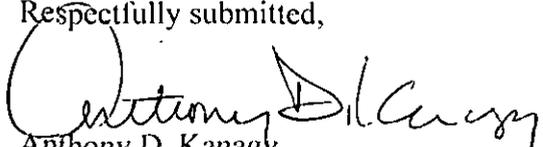
**REQUEST FOR CONFIDENTIAL TREATMENT  
OF PROPRIETARY INFORMATION**

Paragraph No. 29 of the filing contains Confidential cost estimates for implementing and operating the seamless moves and instant connects capability. Duquesne Light has not yet entered into a contract for the completion of the work necessary to implement this capability, and therefore, the public disclosure of this cost information could impact the price that Duquesne Light pays.

Duquesne Light requests that the Confidential version of this filing be given Confidential treatment by the Commission, including its various offices and bureaus and that this information not be disclosed to the public. Duquesne Light will provide the Confidential information to appropriate parties upon execution of a Stipulated Protective Agreement.

Rosemary Chiavetta, Secretary  
April 20, 2015  
Page 2

Respectfully submitted,



Anthony D. Kanagy

ADK/skr  
Enclosure

cc: Certificate of Service

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Duquesne Light Company Seamless Moves :  
and Instant Connects Plan : Docket No. M-2014-2401127

DUQUESNE LIGHT COMPANY'S REVISED PLAN  
REGARDING IMPLEMENTATION OF SEAMLESS MOVES AND INSTANT  
CONNECTS

I. INTRODUCTION

On February 15, 2013, the Pennsylvania Public Utility Commission ("Commission") entered its Final Order regarding its Investigation of Pennsylvania's Retail Electricity Market: End State of Default Service ("*RMI Final Order*") in Docket No. I-2011-2237952. The *RMI Final Order* represents the culmination of a two-year investigation into Pennsylvania's retail electricity market and includes multiple provisions designed to further promote electric competition in the Commonwealth. As part of the *RMI Final Order*, the Commission instructed electric distribution companies ("EDCs") to develop and submit plans, by the end of 2013, which will allow the implementation of seamless moves and instant connects in their service territories by June 1, 2015. *RMI Final Order* pp. 74-75.

Pursuant to the Commission's *RMI Final Order*, Duquesne Light Company ("Duquesne Light" or the "Company") submitted a compliance filing on December 31, 2013 which detailed the Company's plan to implement seamless moves and instant connects in its service territory by June 1, 2015. On August 13, 2014 the Commission issued a Secretarial Letter that permitted EDCs to delay the development of seamless moves and instant connects so EDCs could focus on the implementation of 3-business day supplier switching. Duquesne Light notified the Office of Competitive Market Oversight ("OCMO") that it was postponing the implementation of seamless moves and instant connects. On March 20, 2015, the Commission issued a Secretarial

Letter in the above referenced docket (“March 2015 Secretarial Letter”) directing EDCs to file a revised plan to implement seamless moves and instant connects by July 1, 2016.

This filing contains Duquesne Light’s revised plan to implement seamless moves and instant connects by July 1, 2016. The filing also includes as Exhibit A a Work Plan and Timeline that sets forth key project milestones and includes an estimated timeframe for completing each milestone. In order to achieve the July 1, 2016 implementation date, Duquesne Light respectfully requests Commission approval of this revised plan by July 31, 2015. If this revised plan is not approved by this date or if the Commission requires significant changes to the revised plan, this could delay implementation. In addition, the Company has a number of regulatory initiatives that it is implementing over the next two years. If the implementation of any of these regulatory initiatives are delayed, this could also delay implementation of seamless moves and instant connects. If implementing seamless moves and instant connects must be delayed, Duquesne Light would notify the Commission and file a further revised plan with the Commission with a revised work plan, timeline and implementation date. To the extent any changes to the Company’s tariffs are needed to incorporate and address seamless moves and instant connects then the Company will file such changes thirty (30) days prior to the implementation date.

## **II. BACKGROUND**

1. On February 15, 2013, the Commission issued its *RMI Final Order*. Therein, the Commission directed EDCs to develop and submit plans by the end of 2013 to implement seamless move and instant connect switching processes by June 1, 2015. As described by the Commission, “A ‘seamless move’ is the ability of a customer’s choice of supplier to move with the customer to a new address without interruption. ‘Instant Connect’ is the ability of supply service to start on ‘day one’ of new utility service – without the customer first having to go on

default service.” *RMI Final Order*, p. 70. In the *RMI Final Order*, the Commission directed EDCs to work with electric generation suppliers (“EGSs”) to develop these procedures.

2. In May 2013, a group of Pennsylvania EDCs was formed to attempt to develop a uniform approach for implementing seamless move and instant connect processes. After an initial draft process was established, the EDC group sought input from EGSs. The EDCs and EGSs then worked collaboratively to attempt to develop a uniform approach. During this process, the group discussed various business rules and technical possibilities that would suit the EGS community as well as EDC systems. After several months and many fruitful meetings, the working group decided that it had a general sense of how this could be accomplished. All parties were in agreement that each EDC would develop a plan based on the objectives relevant to its own business needs. Duquesne Light filed its plan on December 31, 2013.

3. In August of 2014, the Commission permitted EDCs to delay the implementation of seamless moves and instant connects, and pursuant to the March 2015 Secretarial Letter the Commission directed EDCs to file revised plans on how they were going to implement seamless moves and instant connects by July 1, 2016. The following is the Company’s revised plan to implement seamless moves and instant connects. The Company is providing information on how it will implement seamless moves and instant connects, a work plan to show how the Company will achieve seamless moves and instant connects by July 1, 2016, an estimate of costs and a proposal for the recovery of those costs.

### **III. IMPLEMENTATION PLAN**

#### **A. SEAMLESS MOVES**

##### **1. Overview**

4. Under the Company’s current enrollment process, a shopping customer that moves within Duquesne Light’s service territory is first enrolled as a default service customer at

the customer's new service location. The customer must re-enroll with their supplier or choose a new supplier in order to shop. The Company's existing IT systems and Electronic Data Interchange ("EDI") transaction process will not currently allow for a seamless move. The customer is also subject to the 3-business day switching period under Rule 45.1 of the Company's retail tariff.

Under the seamless move process, Duquesne Light proposes to allow eligible shopping customers to retain their current EGS when moving within Duquesne Light's service territory. The customer will not be switched to default service when moving to a new location provided that the rules and conditions set forth below are met.

## **2. Seamless Move Rules and Procedures**

5. The seamless move process will extend to all residential customers as well as commercial and industrial customers that use less than 300 kW of demand as defined in the Company's Retail Tariff (collectively, the "Eligible Customers").<sup>1</sup>

6. In order for the customer to maintain its existing EGS, service to a qualifying customer's new location must be in the same rate class (i.e., RS, RH or RA) as the prior location, and the customer must maintain the same supplier billing rate, billing option, and tax exemption percentage. These requirements are designed to protect the customer's existing EGS contract by maintaining the material terms. The EGS must submit a drop request via EDI if it does not wish to continue service to the customer at the new service location. However, the EGS will still have to maintain supply service to this customer until a 3-business day switch can occur at the new

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<sup>1</sup> Large commercial and industrial customers ("Large C&I") will not be included for seamless moves based on the potential problems that may arise due to PJM scheduling. During the collaborative meetings in 2013 certain EGSs expressed a preference for excluding Large C&I customers from the seamless move and instant connect procedures. EGSs participating in the Company's territory, which sell to larger customers, typically have more personalized contact with those customers and would be more knowledgeable about when those customers may move. In addition, Large C&I customers have larger usage than other customers and there may be load scheduling issues if these customers are switched under the accelerated switching procedures.

location under the Company's switching rules set forth in its tariff, if the drop request is not received one business day prior to the customer's service becoming active at the new location.

7. Customers will be required to provide at least one business day's notice prior to effectuating the seamless move to the Company. The Company cannot honor a request to start service on the same day as the request, nor will it allow customers to back-date service. Back-dated service is a form of service whereby a customer wishes to have a service effective date that is earlier than the date that the customer calls to initiate service. Same day or backdated service requests will not be accepted, because this may not allow adequate time to notify the EGS of the change in service, allow the EDC adequate time to schedule load with PJM Interconnection, LLC ("PJM") or give the EGS time to determine whether the change is acceptable under their arrangements with the customer.

8. The Company also proposes that a seamless move should not be allowed for any overlapping service or gaps in service lasting more than three days, any customer wishing to start concurrent service, or any continuous service agreements, which provide for continuance of service in rental properties after a tenant moves out. For continuance of service agreements, also known as landlord/tenant agreements, where the service automatically switches back to the landlord's ownership after the tenant cancels, a seamless move would not qualify because the landlord and the tenant are two different customers.

9. In accordance with the aforementioned controls, the qualifying customer will be required to request to start the new service and end the old service in the same contact with the Company. This allows for the processing of the EDI transactions to facilitate this change to occur on the same day and not on different days which was requested by the EGSs.

10. There must be an active meter at the new location when the customer contacts the Company to effectuate the seamless move. Otherwise, the Company will not have sufficient information to complete the move.

11. An EGS must currently be providing service on the customer's account to be eligible for a seamless move, and any termination of EGS service prior to the customer's move will negate any seamless move by the Company.

### **3. Technical Feasibility and EDI Transactions**

12. Duquesne Light proposes that a new EDI transaction be created to facilitate the seamless move process. The new EDI transaction would be approved by the Electronic Data Exchange Working Group ("EDEWG") consistent with its current procedures. This transaction would include all the pertinent customer information that an EGS would need such as:

- Customer Contact information – new address, name (matching old customer's name);
- Rate class and load profile;
- Bill option, rate code, tax exemption percentage;
- Billing and meter read cycles; and
- Meter information.

13. EDI transactions also should be sent for other reasons that involve the seamless move process. Customer's requesting to change the start date of their new service would require an EDI 814 Change request to be sent to the existing EGS detailing the new start date, and an EDI 814 Drop request would also be sent if the customer decided to cancel the new move. These and any other EDI regulations should follow all the existing standards presented in the Pennsylvania EDI Implementation Guides.

**4. Seamless Move Transaction**

14. If the seamless move criteria have been met, the Company will advise the customer that their EGS supply service will seamlessly move to their new location, and the Company will send a new move transaction to their EGS. In the move transaction, Duquesne Light will send the EGS information that is similar to what is currently provided in a reinstate-request transaction, including the customer name, service address and rate class. The Company will also provide the EGS with: (i) the current supply agreement identification number; (ii) the new supply agreement identification number; and (iii) the service start date. Once the move transaction has been sent to the EGS, the EGS will serve the new account as of the service start date.

15. The seamless move may be terminated or voided after the move transaction is complete under certain circumstances, including where the customer: (i) voids or terminates the new account prior to the service start date; (ii) requests to change the service start date on the new account to a date occurring in the past; or (iii) enrolls a new EGS on the current account before the connection to the new account occurs. In these instances, Duquesne Light will send a drop notification to the EGS.

**B. INSTANT CONNECTS**

**1. Overview**

16. Under the Company's existing procedure, a new customer is first enrolled in default service upon initially receiving electric service. After the customer begins to receive service and the customer's account is activated, a customer may elect to shop. The customer is subject to the 3-business day switching rule set forth in the Company's tariff before the customer can be switched to EGS service.

17. Under the proposed instant connect process, new customers will be able to elect to shop with an EGS without being enrolled in default service, provided that customers meet the instant connect rules that are set forth below.

**2. Instant Connect Rules and Procedures**

18. Much like the eligibility requirements for a seamless move, the instant connect process will extend to all Eligible Customers (as defined above).

19. Customers must provide at least 3-business days prior notice to qualify for the instant connect process.

20. Customers will not be permitted to back date service under the instant connect process because it poses the same scheduling issues identified with backdated service under seamless moves.

21. In order to accommodate instant connections, Duquesne Light will change its system so that it can accept inbound enrollment requests on accounts that are not yet active. The customer will still be responsible for contacting DLC and satisfying all requirements to start service at the new location, and then contacting the supplier to initiate service. The supplier will still be responsible for submitting the enrollment request. The final component of this transaction will be to establish an estimated start date. All of this information will be communicated via the enrollment response sent back to the EGS from Duquesne Light.

22. The EGSs must submit a drop request via EDI if they do not wish to supply service to the customer. However, the supplier will still have to maintain supply service to this customer until a 3-business day switch can occur under the Company's switching rules set forth in its tariff, if the drop request is not received one business day prior to the customer's service becoming active at their premise.

**3. Technical Feasibility and EDI Transactions**

23. No new EDI transactions will need to be created in order to implement instant connects. However, the Company will need to make changes to its internal systems to allow for enrollment requests to be accepted on inactive accounts. This is more of a technical change than a business change. Furthermore, if the Company's plan is approved by the Commission, no further review by EDEWG will be needed because no changes will be made to any business process outside of internal systems.

**IV. WORK PLAN**

24. In the March 2015 Secretarial Letter, the Commission required EDCs to demonstrate how it would achieve implementation of the seamless moves and instant connects by July 1, 2016. The Company has attached to this filing Exhibit A which outlines the Company's work plan to meet the July 1, 2016 deadline. In order to meet the July 1, 2016 deadline, the Company will need to know what, if any, changes to its revised plan as described in this filing are going to be required as soon as possible, but in no event any later than July 31, 2015.

25. The Company has provided a timeframe to meet the July 1, 2016 date as described herein, but that timeframe is highly dependent on the finalization of the seamless moves and instant connects requirements. If this plan is not approved by the Commission by July 31, 2015, or if the plan is significantly revised, the Company will need to re-file its work plan and provide the Commission with a revised implementation date. Implementation of the Company's seamless moves and instant connects solution is also dependent upon EDEWG providing timely approval of the changes described herein.

26. In addition, the Company has a number of regulatory initiatives that it is implementing over the next two years. If the implementation of any of these regulatory

initiatives are delayed, this could also delay implementation of seamless moves and instant connects.

27. If the work plan provided on Exhibit A materially changes, Duquesne Light will file a revised work plan with the Commission.

**V. COST ESTIMATES AND COST RECOVERY**

28. In the March 2015 Secretarial Letter, the Commission directed EDCs to address estimated costs associated with implementing and maintaining seamless moves and instant connects and to provide proposals for recovering such costs.

29. Duquesne Light estimates that it will incur approximately **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]** in capital and expense costs to implement the seamless move and instant connect procedures, as described herein.<sup>2</sup> The Company also estimates that its annual on-going costs will be approximately **[BEING CONFIDENTIAL]** **[END CONFIDENTIAL]** to maintain seamless moves and instant connects including software customizations. Duquesne Light notes that these cost estimates are preliminary and subject to change. While the costs referenced above are estimates, the Company will recover its actual costs.

30. Duquesne Light currently intends to seek recovery of any capital costs in its next base rate proceeding and is seeking permission from the Commission in this filing to recover any expense related costs for implementation and any maintenance costs, through its Retail Markets Enhancement Surcharge. The Company would propose that any on-going maintenance costs be rolled into base rates in its next base rate proceeding.

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<sup>2</sup> The Company intends to implement seamless moves and instant connects at the same time that it will implement its long-term off-cycle switching solution. The Company will seek to extend the implementation date for its long-term off-cycle switching solution in a later filing. If the Company cannot implement these initiatives at the same time, the costs will increase. The Company further notes that it has not entered into a contract for the work to implement seamless moves and instant connects, and thus the actual costs may vary from the Company's estimates.

VI. CONCLUSION

WHEREFORE, Duquesne Light Company requests that the Pennsylvania Public Utility Commission issue an Order accepting the Company's plan for implementation of seamless moves and instant connects, as set forth herein. The Company will submit for Commission approval any necessary changes to its tariffs to incorporate and address seamless moves and instant connects thirty (30) days prior to the implementation date.

Respectfully submitted,



Robert H. Hoaglund (ID # 313383)  
Tishkia E. Williams (ID # 208997)  
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Date: April 20, 2013

Attorneys for Duquesne Light Company

EXHIBIT A

SEAMLESS MOVES AND INSTANT CONNECTS WORKPLAN

WORK PLAN PHASES	2015				2016	
	Q1	Q2	Q3	Q4	Q1	Q2
ANALYSIS PHASE		XXX				
DESIGN PHASE			XXX			
DEVELOPMENT/BUILD PHASE				XXX	XXX	
TEST PHASE					XXX	XXX
DEPLOY – No later than July 1, 2016						XXX

EXTERNAL MILESTONES

ITEM	MILESTONE DATE
COMMISSION APPROVAL	July 2015
EDEWEG APPROVAL	September 2015

## VERIFICATION

I, Yvonne Phillips, being Manager of Customer Initiatives for Duquesne Light Company ("Duquesne Light"), hereby state that the facts set forth in the foregoing are true and correct to the best of my knowledge, information and belief and that I expect Duquesne Light to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: April 20, 2015

Yvonne J. Phillips  
Manager, Customer Regulatory  
Initiatives.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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APN Starfirst, LP  
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Better Cost Control  
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Radnor, PA 19087

Conoco Phillips Company  
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CONSTELLATION NEWENERGY, INC.  
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Direct Energy Services, LLC  
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Houston, TX 77046

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22809 Pacific Coast Highway  
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Discount Power, Inc.  
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Energy Plus Holdings, LLC  
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ETHICAL ELECTRIC  
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Frontier Utilities NE, LLC  
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Great American Power  
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Kennesaw, GA 30144

Green Mountain Energy Company  
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Austin, TX 78746

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Buffalo, NY 14240-2210

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Linde Energy Service  
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N. Eastern States dba ENTRUST  
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Noble Americas Energy Solution  
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North American Power and Gas  
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Norwalk, CT 06854

Oasis Energy  
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Houston, TX 77042

Oxford Energy Services, LLC  
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Park Power  
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Radnor, PA 19087

Pennsylvania Gas & Electric  
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Woodmere, NY 11598

PPL EnergyPlus, LLC  
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Allentown, PA 18101

Public Power, LLC  
39 Old Ridgebury Rd, Suite 14  
Danbury, CT 06810

Reliant Energy Northeast, LLC  
1201 Fannin St., 7th Floor  
Houston, TX 77002-0000

Rescom Energy Corp.  
20 East Avenue  
Bridgeport, CT 06610

Residents Energy, LLC  
20 West Third Street  
Jamestown, NY 14702-0400

Respond Power, LLC  
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Orangeburg, NY 10962

SFE Energy  
651 Holiday Dr., Foster Plaza 5  
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Shipley Energy  
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York, PA 17405

SmartEnergy Holdings, LLC  
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Spark Energy, LP  
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Sperian Energy Corp.  
3440 Lehigh Street #288  
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Star Energy Partners, LLC  
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Starion Energy PA Inc.  
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Southbury, CT 06488

Stream Energy  
P.O. Box 7287  
Philadelphia, PA 19101-7287

TERM Power & Gas LLC  
d/b/a ENCOA  
8847 W. Sam Houston Parkway, North  
Houston, TX 77040

Texas Retail Energy, LLC  
2001 S.E. 10th Street  
Bentonville, AR 72716

The Royal Bank of Scotland plc  
401 West A Street, Suite 500  
San Diego, CA 92101

Think Energy  
PO Box 27004  
Lehigh Valley, PA 18002

Tobelmann Energy Brokers Inc  
5401 Lister Court  
Chester Springs, PA 19425

TriEagle Energy, LP  
PO Box 131615  
The Woodlands, TX 77393-1615

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UGI Energy Services, LLC  
One Meridian Blvd., Suite 2C01  
Wyomissing, PA 19610

U.S. Energy Partners, LLC  
400 WillowBrook Office Park  
Fairport, NY 14450

Verde Energy USA, Inc.  
101 Merritt 7, 3rd Floor  
Norwalk, CT 06851

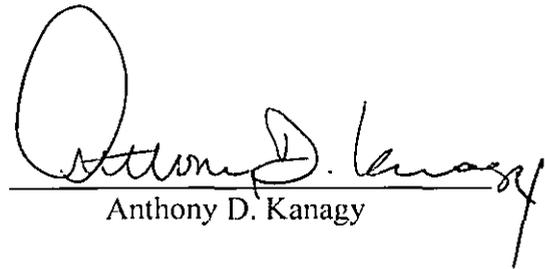
Viridian Energy PA, LLC  
64 North Main Street  
Norwalk, CT 06854

Washington Gas Energy Services  
P.O. Box 24475  
Cleveland, OH 44124

XOOM Energy Pennsylvania, LLC  
11208 Statesville Rd.  
Huntersville, NC 18201

Your Choice Energy, LLC  
1616 Batchelor Court  
Dunedin, FL 34698

Date: April 20, 2015

  
Anthony D. Kanagy

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