

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

**UE 416
General Rate Revision**

**PORTLAND GENERAL ELECTRIC
COMPANY**

**Joint Testimony in Support of Second Partial
Stipulation**

Direct Testimony of:

Matthew Muldoon, OPUC Staff

Will Gehrke, CUB

Bradley G. Mullins, AWEC

Steve Chriss, Walmart

Jaki Ferchland, PGE

August 21, 2023

Table of Contents

I.	Introduction.....	1
II.	Discourse on Resolved Issues	5
	List of Exhibits	10

I. Introduction

1 **Q. Please state your names and positions with your respective organizations.**

2 A. My name is Matthew Muldoon. I am a Manager in the Finance and Accounting Section of the
3 Rates, Safety and Utility Performance Program of the Public Utility Commission of Oregon
4 (OPUC). My qualifications appear in Staff/401.

5 My name is Will Gehrke. I am an Economist for the Oregon Citizens' Utility Board
6 (CUB). My qualifications appear in Exhibit CUB/101.

7 My name is Bradley G. Mullins. I am an independent consultant testifying on behalf of
8 the Alliance of Western Energy Consumers (AWEC). My qualifications appear in Exhibit
9 AWEC/101.

10 My name is Steve W. Chriss. I am Senior Director, Utility Partnerships for Walmart
11 Inc. (Walmart). My qualifications appear in Exhibit Walmart/101.

12 My name is Jaki Ferchland. I am a Manager in Regulatory Affairs for Portland General
13 Electric Company (PGE). My qualifications appear at the end of Exhibit PGE/200.

14 **Q. What is the purpose of your testimony?**

15 A. The purpose of our testimony is to describe the Second Partial Stipulation (Stipulation)
16 reached between Parties to this proceeding, OPUC Staff (Staff), CUB, AWEC, Walmart, and
17 PGE (Stipulating Parties), regarding various topics in this general rate case (Docket No. UE
18 416). A copy of the Stipulation is provided as Stipulating Parties Exhibit 201. While there are
19 other parties to this case, those parties have not taken any position on the issues resolved in
20 this Stipulation and do not oppose this Stipulation.

1 **Q. What is the basis for the Stipulation?**

2 A. PGE filed this general rate case (GRC) on February 15, 2023. Over the following four months,
3 Staff, AWEC, CUB, Calpine Solutions, Kroger, New Sun Energy, and Northwest Energy
4 Coalition (NWECC)/Natural Resources Defense Council (NRDC) developed, and PGE
5 responded to over 1,200 data requests relating to PGE’s filed case. On April 13, 2023, Parties
6 held a workshop to discuss various topics and issues related to the filing. On May 24, 2023,
7 Parties filed opening testimony related to net variable power costs (NVPC), and on June 13,
8 2023, Parties filed opening testimony related to all other topics in the case. On June 14, 2023,
9 and again on July 11, 2023, the Stipulating Parties participated in Settlement Conferences
10 related to NVPC and agreed to settlements of certain NVPC items. Those settlements
11 represent the First and Third Stipulations in this GRC.

12 On June 28, 2023, August 1, 2023, August 7, 2023, and August 8, 2023, the Stipulating
13 Parties attended Settlement Conferences related to non-NVPC items, and the Stipulating
14 Parties agreed to additional settlements of certain items in this GRC resulting in the
15 Stipulation described below.

16 **Q. Please summarize the agreement for the items contained in the Second Stipulation.**

17 A. The Stipulation represents the settlement of multiple revenue requirement issues. A copy of
18 the Stipulation is provided as Exhibit 201. The Stipulation includes a black box settlement
19 reducing rate base by \$27.5 million in this rate case and revenue requirement by \$4.25 million
20 each year for 16 years to resolve the items shown in Table 1.

Table 1
Black Box Rate Base Items

Issue No.	Description
A-04	Accumulated Deferred Income Taxes (ADIT) associated with PGE’s major deferrals
C-02 and A-09	Capital investment associated with the Carty intake fire in 2022
S-13 and A-15	Faraday Repowering and Resiliency
S-16	Fleet charging investments

**UE 416 / Stipulating Parties / 200
Muldoon – Gehrke – Mullins – Chriss – Ferchland / 3**

S-17	New fleet electrification investments
S-18	Line extension allowances from UE 394
S-19	New line extension allowances
S-20	Transportation Electrification (TE) investments
S-21	TE Electric Island investments
S-22	TE database investments
S-24	TE stranded charging assets
S-26	Overhead FITNES investments
S-27	Transmission and distribution (T&D) non-FITNES investments
S-28	Cloud-based license and hosting fees deferred debit

- 1 Table 2 lists the items in the black box for O&M and Table 3 summarizes the issues settled
2 beyond the black box identified above.

**Table 2
Black Box O&M Items**

Issue No.	Description
S-06	Health and Wellness Benefits
S-09	Grid Modernization Positions
S-10	Wages and Salaries
S-11	Generation Expenses
S-12	Customer Service
S-14	Other Revenue
S-23	Transportation Electrification Operating Expense

**Table 3
Other Settled Items**

Issue No.	Category	Brief Description
A-03	Production Tax Credits (PTCs)	PGE will remove the deferred tax asset (DTA) amount projected for 2023 PTCs and will monetize the PTCs. PGE will be allowed recovery of the discount but will not engage in a sale if the discount exceeds 10%, at which time the PTCs will be returned to the DTA in this 2024 GRC.
A-15	Fleet Fuel	Parties agree that PGE will reduce its test-year operations and maintenance (O&M) for fleet fuel by \$180,000, and its rate base by \$120,000.
S-02	Cost of Debt	Parties agree to a weighted cost of debt of 4.485%.
S-04	Utility Trainings Op Ex	Parties agree PGE will reduce O&M by \$25,000
S-07	Memberships	Parties agree PGE will reduce O&M by \$27,252
S-30	Major Maintenance Accrual (MMA)	PGE agrees to update its MMA values to reflect the changes identified by Staff.
A-11, A-12, S-03	Boardman Decommissioning Net Collections and Open	Parties agree that PGE will refund applicable amounts beginning January 1, 2024, over a two-year period.

UE 416 / Stipulating Parties / 200
Muldoon – Gehrke – Mullins – Chriss – Ferchland / 4

	Access Transmission Tariff (OATT) Revenues	
C-03	Amazon Pay	Parties agree that PGE will continue to offer this program but will not include the cost of the program in the revenue requirement.
N/A	Capital Structure	Parties agree that for regulatory purposes, PGE's capital structure will be 50% debt and 50% equity.
N/A	Load Forecast	Parties agree to resolve the load forecast using PGE's methodology. PGE will work with Staff to include Staff's ARIMA proposal in this GRC. The load forecast will be updated again in September.

- 1 **Q. Does the Stipulation resolve all revenue requirement issues in this proceeding?**
- 2 A. No. The Stipulation resolves only the issues listed above related to revenue requirement.

II. Discourse on Resolved Issues

1 **Q. Please describe the black box for rate base Stipulation.**

2 A. The Stipulating Parties agreed to resolve a number of rate base-related items within a black
3 box for a total of \$27.5 million of rate base for the 2024 test year and \$4.25 million per year
4 until January 1, 2040. The items include: AWEC’s proposal to capture ADIT benefits
5 associated with PGE’s major deferrals, investments made to address the Carty air intake fire
6 that occurred in 2021, proposed reductions to recovery of the Faraday Resiliency and
7 Repowering project, all of the proposed rate base reductions in Staff Exhibit 1900 related to
8 TE, fleet electrification and line extension allowances, Staff’s proposed reductions to T&D
9 overhead FITNES and non-FITNES investments, and Staff’s proposed reductions to the
10 deferred debit on cloud-based license and hosting fees.

11 In addition to the reduction in rate base, PGE will include the associated revenue
12 requirement impact of the capital-related elements of the Carty intake fire as presented in
13 AWEC’s opening testimony. Furthermore, PGE will reflect a \$27.5 million rate base
14 reduction in PGE’s results of operations reports filed for calendar year 2024 and each year
15 after until new rates are adopted in a future rate case, and PGE will reflect the rate base
16 reductions in PGE’s ROO until rates from PGE’s next GRC go into effect; and, the \$4.25
17 million revenue requirement adjustment in PGE’s ROO for calendar years 2024 through 2039.

18 **Q. Please describe the O&M black box Stipulation.**

19 A. The Stipulating Parties agree to resolve a number of O&M related items within a black box
20 for a total of \$11 million of O&M.

21 **Q. Please describe the Stipulation regarding the PTCs.**

1 A. In recognition of the new ability to sell PTCs after the passage of the federal Inflation
2 Reduction Act of 2022, AWEC proposed in their opening testimony that PGE sell all of the
3 PTCs generated in 2022 and 2023 to reduce the DTA on PGE’s balance sheet. As the law does
4 not allow for the sale of generated PTCs prior to 2023, PGE is only able to sell 2023 PTCs.
5 As such, the 2022 PTCs will remain a DTA, but PGE will reduce the DTA by \$32.1 million,
6 the projected 2023 PTC value currently included in this GRC and will engage in a request for
7 proposal (RFP) process to sell them.

8 The Stipulating Parties agree to either support or not oppose PGE’s property sales
9 application made consistent with the terms of this stipulation, which will seek approval from
10 the Commission to sell the PTCs. Stipulating Parties recognize that customers are already
11 receiving the full benefit of the PTCs through power cost prices set for 2023 as adopted in
12 Order No. 22-426. As such, the property sale application will seek to recover the difference
13 between the full value and the discounted sales value from customers within PGE’s property
14 sales balancing account, so long as the difference is no greater than 10%. If PGE cannot secure
15 a transaction that would maintain 90% or more of the PTC value, PGE will not proceed with
16 the transaction and the PTCs will return to the DTA in PGE’s test year rate base in this case.

17 Additionally, PGE will not seek to defer any costs associated with running an RFP for
18 this matter.

19 **Q. Please describe the Stipulation regarding capital structure.**

20 A. Both PGE and Staff provided testimony that a 50% debt and 50% equity capital structure is
21 the most appropriate structure for PGE to maintain. No other Party offered testimony
22 proposing a different structure. As such, the Stipulating Parties agree that PGE will maintain
23 a capital structure of 50% debt and 50% equity.

1 **Q. Please describe the Stipulation regarding PGE’s load forecast.**

2 A. In opening testimony, Staff raised a number of ideas regarding PGE’s load forecast, many of
3 which they stated should be examined and considered by PGE in its next GRC. Staff proposed
4 that PGE automatically parameterize its autoregressive integrated moving average (ARIMA)
5 models into its forecast in this case. PGE agrees to work with Staff to modify ARIMA models
6 for the September 2023 load forecast and to participate in a workshop regarding Staff’s other
7 proposals ahead of its next GRC. All of the Stipulating Parties agree to PGE’s methodology
8 otherwise and agree that PGE’s final load forecast update will occur in September 2023.

9 **Q. Please describe the Stipulation regarding MMAs.**

10 A. Staff identified multiple concerns within their opening testimony regarding PGE’s MMA
11 calculation included in this GRC. Stipulating Parties agree that PGE will adopt Staff’s
12 adjustments to the MMA calculation resulting in an O&M decrease of \$1,014,969 and an
13 increase to capital of \$95,441.

14 **Q. Please describe the Stipulation regarding Boardman decommissioning collections and**
15 **OATT revenues.**

16 A. In their opening testimony, AWEC identified that amounts remaining in the Boardman
17 decommissioning fund under Schedule 145, and given that Boardman has been shut down and
18 demolished they recommended that any funds remaining in Schedule 145 be returned to
19 customers. Furthermore, both Staff and AWEC identified OATT revenues that have been
20 deferred, which reflect the change in PGE’s transmission rates, and requested that the amounts
21 be refunded to customers to offset the customer price increase of this rate case. Parties agreed
22 that PGE will begin to amortize the amounts associated with both items beginning January 1,
23 2024, over a two-year period.

1 **Q. Please describe the Stipulation regarding Amazon Pay.**

2 A. In testimony, CUB requested that PGE stop offering Amazon Pay as a payment option to
3 residential customers. CUB argued that residential customers have other options to pay online
4 and/or can use a bank debit or credit card and that the cost of Amazon Pay is not needed. PGE
5 disagrees that Amazon Pay is not needed or beneficial to customers. For settlement purposes,
6 Parties agree that PGE may continue to offer Amazon Pay to customers but will not include
7 the cost of the offering in PGE's revenue requirement for the 2024 test year. This results in
8 removal of \$7,745. In PGE's next GRC, PGE will include information identifying the
9 transaction costs for the Amazon Pay payment option.

10 **Q. Please describe the Stipulation regarding cost of debt?**

11 A. In their opening testimony, Staff indicated that they verified any debt retiring through 2024
12 was not a part of the weighted average debt calculation. For new issuances, they used forward
13 treasury curves from the Bloomberg terminal and took a five-week average of the forecast
14 rates. They then used the Bloomberg terminal to find utility debt instruments with similar
15 ratings to PGE and subtracted the current treasury rate to determine an appropriate credit
16 spread. Next, they added the credit spread to the five-week average treasury rates to determine
17 the coupon rate for PGE's issuances in 2023 and 2024. On the day of settlement, PGE was
18 able to price its issuances for 2023, locking in the interest rate, term, and size of each issuance.
19 PGE is still projecting one issuance in 2024 and Stipulating Parties agree to use Staff's
20 proposed method for determining the coupon rate using the most recent information. The
21 result is shown in Stipulating Parties Confidential Exhibit 202 and results in a weighted cost
22 of debt of 4.485%.

23 **Q. Please describe the Stipulation regarding fleet fuel.**

1 A. In their opening testimony, AWEC proposed that PGE reduce its fleet fuel O&M forecast
2 and rate base-related costs by \$1.6 million and \$1.2 million respectively. AWEC’s
3 recommendation was based on adjusting test year fuel cost to be equal to the year-end 2024
4 share of non-electric vehicles times the 2021 fuel expense.

5 For settlement purposes, the Stipulating Parties agree that PGE will reduce its O&M
6 forecast for fleet fuel by \$180,000, and its rate base forecast by \$120,000.

7 **Q. What is the recommendation to the Commission concerning the resolution of issues**
8 **and adjustments described in your testimony?**

9 A. The Stipulating Parties agree that rates consistent with this Stipulation would be fair, just, and
10 reasonable. The Stipulation was reached after parties reviewed filed testimony, responses to
11 over 1,200 data requests, and participated in multiple settlement conferences to discuss the
12 issues. Because it results in a reasonable and appropriate resolution of the contested issues,
13 the Stipulating Parties recommend and request the Commission approve the Stipulation
14 without modification.

15 **Q. Do you have any other items to discuss?**

16 A. No.

17 **Q. Does this conclude your testimony?**

18 A. Yes.

List of Exhibits

Stipulating Parties Exhibit

Description

201	Partial Stipulation
202C	Cost of LT Debt

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 416

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Request for 2024 General Rate Revision; and
2024 Annual Power Cost Update.

**SECOND PARTIAL
STIPULATION**

This Second Partial Stipulation (“Stipulation”) is between Portland General Electric Company ("PGE"), Staff of the Public Utility Commission of Oregon (“Staff”), the Oregon Citizens' Utility Board ("CUB"), the Alliance of Western Energy Consumers (“AWEC”), and Walmart, Inc. (“Walmart”), (collectively, the “Stipulating Parties”). Because Calpine Solutions, CAPO, Kroger, and NRDC did not take a position on the issues resolved by this Stipulation, they are not parties to this Stipulation but each have individually indicated they do not oppose it.

Select parties have achieved two other partial settlements in this docket on June 14, 2023, and July 11, 2023, resolving certain issues related to net variable power costs (NVPC) in this general rate case. The parties also engaged in settlement discussions on June 28, 2023, August 1, 2023, August 7, 2023, and August 8, 2023, regarding non-NVPC items in this general rate case. The Stipulating Parties participated in the settlement discussions related to this non-NVPC settlement, and, beyond those described above, no other parties participated in the discussion. As a result of the discussions, the Stipulating Parties have reached a compromise settlement resolving several additional issues in this docket, as set forth below.

TERMS OF SECOND PARTIAL STIPULATION

1. This Stipulation resolves only the general rate case issues described below.
2. Black box settlement for rate base
 - a. Stipulating Parties agree that PGE will reduce its rate base in this general rate case by \$27.5 million and PGE will reduce its revenue requirement by another \$4.25 million each year, beginning January 1, 2024, and continuing through December 31, 2039 (16 calendar years) for the following items raised by the Parties:
 - i. Accumulated Deferred Income Taxes on deferrals (A-04), Carty Air Intake Fire (C-02 and A-09), Faraday Resiliency and Repowering (S-13 and A-15), Fleet Charging (S-16), New Fleet Electrification (S-17), Line Extension Allowances reductions from UE 394 (S-18), New Line Extension Allowances (S-19), Transportation Electrification (TE) Investments (S-20), TE Electric Island Investments (S-21), TE Database Investment (S-22), TE Stranded Charging Assets (S-24), Transmission & Distribution (T&D) Overhead FITNES (S-26), T&D non-FITNES Investments (S-27), Cloud Based License and Hosting Fees Deferred Debit (S-28).
 - b. The \$27.5 million rate base reduction will be reflected in all PGE Results of Operation Reports filed beginning with calendar year 2024 and prior to the effective date of rates adopted in PGE's next General Rate Case, and the \$4.25 million of revenue requirement reduction will be reflected in all PGE Results of Operations Reports filed for calendar years 2024 through 2039, inclusive.

- c. In addition, PGE will include the associated elements of rate base as presented in testimony by AWEC for only the proposed capital-related revenue requirement reductions related to the Carty Intake Fire.
 - d. Parties agree that this resolves all issues concerning the recovery of costs included in this 2024 general rate revision for the Faraday Resiliency and Repowering Project.
3. Black Box Settlement for O&M
- a. Stipulating Parties agree that PGE will reduce its O&M in this general rate case by \$11 million for the following items raised by the Staff:
 - i. Health and Wellness Benefits (S-06), Grid Modernization Positions (S-09), Wages & Salaries and Incentives O&M (S-10), Generation Expenses (S-11), Customer Service (S-12), Other Revenue (S-14), Transportation Electrification Operating Expense (S-23).
4. Production Tax Credits (A-03)
- a. Parties agree to fully resolve AWEC's recommendations regarding PTCs given the following:
 - i. Parties recognize that 2022 PTCs cannot be sold at this time.
 - ii. The 2023 PTC value has already been forecast into PGE's 2023 annual power cost update, which was finalized through Commission Order No. 22-427.
 - iii. The \$32.1 million of 2023 PTCs currently included in PGE's rate base as a deferred tax asset (DTA) will be removed.
 - iv. Parties agree to support or not oppose a property sales application filed by PGE to sell the 2023 PTCs for no less than 90% of the PTC value.

- The difference between the full value and the discounted value will be recoverable from customers within PGE’s property sales balancing account.
 - If PGE cannot obtain 90% or more of the value, PGE will not proceed with the sale and the PTC value will be returned to the DTA in PGE’s test year rate base.
- v. Any additional expenses incurred to run a request for proposal process to sell the PTCs will not be recoverable and will be considered a normal ongoing business expense.

5. Capital Structure

- a. Stipulating Parties agree that for regulatory purposes, PGE’s capital structure will be 50% equity and 50% debt.

6. Load Forecast

- a. Stipulating Parties agree to resolve the method used to develop the load forecast for this GRC recognizing there will be an update in September 2023, and PGE will work with Staff to include Staff’s proposed ARIMA changes in this GRC. PGE will hold at least one workshop prior to the 2025 AUT to discuss the other Staff-proposed changes to the load forecast method proposed in this case, at which stakeholders may also participate and propose changes to the load forecasting method.

7. Major Maintenance Accrual (MMA) (S-30)

- a. Parties agree that PGE will update its MMA proposal in this GRC to reflect the changes identified by Staff. This results in a decrease to O&M of \$1,014,969 and an increase to capital of \$95,441.

8. Amortization of excess Boardman Decommissioning collections and Deferred Open Access Transmission Tariff (OATT) Revenue (A-11, A-12, S-03)
 - a. Parties agree that PGE will begin to refund any excess Schedule 145, Boardman Decommissioning amounts and OATT Revenues deferred under Docket No. UM 2217, beginning January 1, 2024, over a period of two years.
9. Amazon Pay (C-03)
 - a. Parties agree PGE may continue to offer this program to customers but will not include the cost of the program in the revenue requirement in this rate case, but PGE may propose recovery in future proceedings. This will result in a reduction of \$7,745. In its next GRC, PGE will include information showing the transaction costs for the Amazon Pay payment option.
10. Cost of Debt (S-02)
 - a. Parties agree to a weighted cost of debt of 4.485%, consistent with the Stipulating Parties' Confidential Exhibit 202.
11. Fleet Fuel (A-15)
 - a. Parties agree that PGE will reduce its O&M forecast for fleet fuel by \$180,000, and remove from rate base an amount equal to \$120,000.
12. Apprentice training in utility operations (S-04)
 - a. Parties agree that PGE will reduce its O&M budget by \$25,000.
13. Memberships (S-07)
 - a. Parties agree that PGE will reduce its O&M budget by \$27,262.

14. Stipulating Parties recommend and request that the Commission approve the adjustments and provisions described herein as appropriate and reasonable resolutions of all issues addressed in this Stipulation.
15. Stipulating Parties agree that this Stipulation is in the public interest, and will result in rates that are fair, just, and reasonable, consistent with the standard in ORS 756.040.
16. Stipulating Parties agree that this Stipulation represents a compromise in the positions of the Stipulating Parties. Without the written consent of all the Stipulating Parties, evidence of conduct or statements, including but not limited to term sheets or other documents created solely for use in settlement conferences in this docket, is confidential and not admissible in this instance or any subsequent proceeding, unless independently discoverable or offered for other purposes allowed under ORS 40.190.
17. Stipulating Parties have negotiated this Stipulation as an integrated document. The Stipulating Parties seek to obtain Commission approval of this Stipulation after initial briefs were filed but prior to evidentiary hearings. If the Commission rejects all or any material part of this Stipulation, or adds any material condition to any final order that is not consistent with this Stipulation, each Stipulating Party reserves its right: (i) pursuant to OAR 860-001-0350(9), to present evidence and argument on the record in support of the Stipulation, including the right to cross-examine witnesses, introduce evidence as deemed appropriate to respond fully to issues presented, and raise issues that are incorporated in the settlements embodied in this Stipulation; and (ii) pursuant to ORS 756.561 and OAR 860-001-0720, to seek rehearing or reconsideration, or pursuant to ORS 756.610 to appeal the Commission's final order. Stipulating Parties agree that in the event the Commission rejects all or any material part of this Stipulation or adds any material condition to any final

order that is not consistent with this Stipulation, Stipulating Parties will meet in good faith within ten days and discuss next steps. A Stipulating Party may withdraw from the Stipulation after this meeting by providing written notice to the Commission and other Stipulating Parties.

18. This Stipulation will be offered into the record in this proceeding as evidence pursuant to OAR 860-001-0350(7). Stipulating Parties agree to support this Stipulation throughout this proceeding and in any appeal and provide witnesses to support this Stipulation (if required by the Commission), and recommend that the Commission issue an order adopting the settlement contained herein. By entering into this Stipulation, no Stipulating Party shall be deemed to have approved, admitted or consented to the facts, principles, methods or theories employed by any other Stipulating Party in arriving at the terms of this Stipulation. Except as provided in this Stipulation, no Stipulating Party shall be deemed to have agreed that any provision of this Stipulation is appropriate for resolving issues in any other proceeding.
19. This Stipulation may be signed in any number of counterparts, each of which will be an original for all purposes, but all of which taken together will constitute one and the same agreement.

DATED this 21st day of August, 2023.

/s/ Brett Sims
PORTLAND GENERAL ELECTRIC
COMPANY

/s/ Stephanie S. Andrus
STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

/s/ Michael P. Goetz
OREGON CITIZENS' UTILITY BOARD

/s/ Tyler C. Pepple
ALLIANCE OF WESTERN
ENERGY CONSUMERS

/s/ Justina Caviglia
WALMART

**THIS ATTACHMENT IS
CONFIDENTIAL
PER PROTECTIVE ORDER 23-039
AND IS PROVIDED SEPARATELY**

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **Stipulating Parties' CONFIDENTIAL Exhibit 202** to be served by electronic mail to those parties whose e-mail addresses appear on the attached service list for OPUC Docket UE 416.

Dated at Portland, Oregon, this 21st day of August, 2023.

Respectfully submitted,



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