STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Commonwealth Edison Company	)	
	)	Docket No. 10-0467
Proposed general increase in electric rates	)	
	)	

INITIAL POST-HEARING BRIEF OF THE COMMERCIAL GROUP

I. INTRODUCTION / STATEMENT OF THE CASE[1]

The Commercial Group is composed of large retailers, Best Buy Co., Inc., J.C. Penney Corporation, Inc., Macy's, Inc., Safeway, Inc., Target, Inc., Sam's West, Inc., and Wal-Mart Stores, Inc., plus the Illinois Retail Merchants Association ("IRMA"). As such, the Commercial Group represents the interests of 23,000 retail operations accounting for approximately 85 percent of all retail sales in Illinois. CG Ex. 2.0, p. 1. Illinois retailers are a vital part of the Illinois economy, employing one of every five working Illinoisans and generating about one-third of the revenues that fund state government. *Id*. at 2. Illinois commercial retailers for many years now have borne a heavy burden subsidizing other classes of ComEd customers. CG Ex. 1.0, 24:420-423; CG Cross Ex. 1. Therefore, the Commercial Group respectfully requests in this brief that the Administrative Law Judges ("ALJs") recommend and the Illinois Commerce Commission ("Commission") adopt orders that

> 1) limit the overall revenue increase to only that increase necessary to allow Commonwealth Edison Company ("ComEd") to provide adequate and effective service,
>
> 2) make corrections to the class cost and distribution loss studies as are presented herein,
>
> 3) establish cost-based rates so that all customer classes pay their fair share of ComEd's utility costs, and
>
> 4) if the Commission decides for policy reasons that any customer classes need to be subsidized, the Commission should spread that subsidy burden as broadly as possible so as to minimize the burden on any individual customer class.

[1] The Commercial Group follows herein a draft outline for briefs circulated among the parties following the hearings. Failure to address an issue in the outline should not be construed as endorsement for any other party's position.

IV. RATE BASE

C. Potentially Contested Issues

1. Post Test Year Adjustments

(a) *Pro Forma* Capital Additions

The Commercial Group takes no position on proposed post-test year capital additions except that if post-test year adjustments are made to rate base, corresponding adjustments should be made for accumulated depreciation and accumulated deferred income taxes consistent with recent court and Commission decisions.

(b) Accumulated Provisions for Depreciation and Amortization Related Provisions for Accumulated Depreciation

The Appellate Court of Illinois (2nd Dist.) held on appeal of the 2007 ComEd rate case decision that "[t]he utility's plant in service and net plant are opposing sides of a coin" and it is reversible error for the Commission to "recogniz[e] increases in rate base investment value due to post-test-year additions without recognizing contemporaneous offsetting decreases in the value of that investment attributable to ongoing depreciation." *Commonwealth Edison Co. v. Ill. Commerce Comm'n, et al.*, 2010 Ill. App. LEXIS 1057, *29. The proper match of costs and revenues in a rate year is a bedrock principle of utility law. The Commission itself determined in a 2003 Ameren rate case final order[2] that post-test year capital additions are allowed only to the extent they exceed increases in post-test year accumulated depreciation. Not doing so "would result in a mismatch of costs and revenues that may be expected for the period during which rates are in place." *Id*. The Commission reiterated this finding in a more recent Ameren order. *Re: Ameren CILCO et al.*, Docket Nos. 09-0306. April 29, 2010 Order at 30-31; *affirmed on rehearing* (November 4, 2010).

[2] October 23, 2003 Order, Docket Nos. 02-0798, et al., pp. 10-11.

Notwithstanding these decisions, ComEd proposes to increase the value of its rate base on one side of the coin by over $1 billion through post-test year additions without offsetting such amounts on the other side of the coin with the corresponding decrease in value of its rate base (during the same period) from accumulated depreciation and amortization. Trying to balance both sides of the coin, IIEC witness Gorman recommended a $582.7 million correction to ComEd's proposed adjustment for plant additions. IIEC Ex. 1.0, pp. 71-73. AG/CUB witness Effron proposed similar adjustments that would increase depreciation reserve by $490 million. AG/CUB Ex. 7.1, Sched. B-3. Staff witness Ebrey likewise proposed adjustments to match test year deprecation with post test year capital additions. Staff Ex. 1.0, pp. 10-15. The Commercial Group supports the adjustments of Staff, AG/CUB and IIEC, as may have been updated throughout this proceeding.

(c) Accumulated Deferred Income Taxes (ADIT)

As demonstrated by AG/CUB witness Effron, IIEC witness Gorman, and Staff witness Ebrey, to the extent post-test year plant investment is added to rate base, the corresponding impact of that additional plant on accumulated deferred income taxes ("ADIT") likewise should be taken into account. AG/CUB Ex 8.0 (Effron rebuttal), p. 20; IIEC Ex. 1.0, p. 72; Staff Ex. 1.0, p. 10. As with accumulated depreciation reserve, a one-sided adjustment for post-test year plant additions without a corresponding ADIT adjustment is imbalanced and unreasonable ratemaking. Therefore, the Commercial Group supports an ADIT adjustment consistent with the period for any post-test year plant adjustment.

VI. RATE OF RETURN

E. Cost of Common Equity

The various return on equity witnesses provide the following recommendations:

McNally (Staff)	10.0%	Staff Ex. 5.0, p. 33.
Gorman (IIEC)	9.6%	IIEC Ex. 1.0, p. 2.
Hadaway/Tierney (ComEd)	11.5%	ComEd Ex. 11.0 (Hadaway), p. 38; ComEd Ex. 13.0 (Tierney), p. 19.

Members of the Commercial Group are involved in utility rate proceedings across the country and the Commercial Group points out that a high-level reasonableness test shows that ComEd's requested ROE of 11.5% is much too high. Electric utility ROEs across the country (including those for integrated generation, transmission, and distribution utilities) have averaged over the past five years roughly 10.4% in a close range between 10.36% and 10.48%. *See* IIEC Ex. 1.11. ComEd is a transmission and distribution-only company ("T&D Utility"). There is near universal agreement that such companies have a lower risk profile than integrated generation and distribution utilities (*e.g.* IIEC Ex. 1.0, p. 58), which would place average T&D Utility ROEs well below 10.4%. Accordingly, the recommendations by witnesses McNally and Gorman for ROE of 10.0% and 9.6% appear to be much more in line with reality than the 11.5% proposed by ComEd. The Commercial Group supports an ROE for ComEd in the range of 9.6 to 10.0%.

F. Adjustments to Rate of Return

Ms. Tierney supports a 40-basis point adder for ComEd's participation in energy efficiency efforts. ComEd. Ex. 13.0, p. 19. Staff witness McNally, however, suggests a 40-basis point reduction if the Commission adopts the ComEd proposal for an 80/20 fixed/variable rate design, which he categorizes as a type of revenue decoupling. Staff Ex. 5.0 pp.37-38. At the same time, ComEd is proposing an Alternative Regulation mechanism that would reduce

ComEd's risk. Tr. 1524, lns. 18-21 (Brosch). NRDC has proposed a decoupling mechanism that would also decrease ComEd's risk. AG/CUB Ex. 12.0, lns. 44-46. Many utility commissions have recognized that decoupling mechanisms reduce utility risk and have lowered ROEs accordingly. For example, in setting a T&D Utility's ROE at 9.6 percent just last month, the Massachusetts Department of Public Utilities held that a revenue decoupling mechanism for Western Massachusetts Electric Company "will reduce the variability of the [utility's] revenues and accordingly, reduce its risk and its investor's return requirement."[3] So also, the Public Utility Commission of Oregon, in approving a decoupling mechanism for Portland General Electric, reduced the utility's authorized ROE by 10 basis points to "reflect the reduction in the company's risk."[4] The Maryland Public Service Commission, in approving a Bill Stabilization Adjustment mechanism for Potomac Edison, recognized that the mechanism "reduces risk and therefore reduces the company's cost of capital," as it reduced the utility's ROE by 50 basis points.[5]

The Commission should reject ComEd's proposed 40-basis point adder and reflect in ROE any specific risk-reducing mechanisms that are adopted, such as NRDC's decoupling mechanism or an extensive Alternative Regulation program.

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[3] *Petition of Western Massachusetts Electric Company for Approval of a General Increase in Electric Distribution Rates and a Revenue Decoupling Mechanism;* Massachusetts Department of Public Utilities; D.P.U. 10-70; (January 31, 2011), p. 283.

[4] *In the Matter of Portland General Electric Co., Request for a General Rate Revision*, Public Utility Commission of Oregon, Docket UE 197, Order 09-020 (Jan. 22, 2009) pg. 29.

[5] *In the Matter of the Application of Potomac Electric Power Company to Revise its Rates and Charges for Electric Service and for Certain Rate Design Changes*, Maryland Public Service Commission, Case No. 9092, Order No. 81517 (July 19, 2007) pg. 81.

VII. COST OF SERVICE AND ALLOCATION ISSUES

A. Overview

ComEd presented two main sets of cost of service studies in this proceeding; the proposed ECOSS similar to ComEd's historic ECOSS but improved based on prior Commission orders (ComEd Ex. 15.1, updated in 51.1 and 75.1) and the preferred exemplar primary ECOSS with primary and secondary customers and facilities separated (ComEd Ex. 22.1, corrected in Ex. 51.2 and updated in Ex. 75.2). ComEd submitted a third ECOSS set in response to an IIEC data request that provides for alternative exemplar rates with numerous primary and secondary subclasses. ComEd Exs. 51.3 and 75.3.

If the Commission decides to establish a Primary customer class in this proceeding, the Commission should use the ECOSS in ComEd Exhibit 51.2 (as updated by ComEd Ex. 75.2) as a guide for class revenue allocation, which ECOSS corrects the allocation of secondary distribution line costs erroneously presented in ComEd Exhibit 22.1 (ComEd's original exemplar primary ECOSS). *See* discussion *infra*, Section VII.B. On the other hand, if the Commission decides not to implement a Primary voltage class in this case, then the Commission should use the ECOSS in ComEd Ex. 51.1 (75.1) as a guide for class revenue allocation. CG Ex. 1.0 p.23; CG Ex. 3.0 p.2. Whether the Commission chooses to use the ECOSS filed in ComEd Exs. 51.1 (75.1) or 51.2 (75.2), such study should be updated 1) to restore the allocation of distribution substation and primary feeder line costs to the NCP allocation ComEd historically has used, Section VII.C.1.(d)&(e) *infra*, and 2) to correct the line distribution loss error addressed in Section VIII.C.6 *infra*.

B. Potentially Uncontested Issues

Correction to Secondary Line Cost Allocation Factor Mr. Baudino corrected the proposed allocation of secondary distribution line costs in ComEd's exemplar Primary ECOSS to reflect that Medium (and larger) load customers do not take service over the Company's secondary distribution lines. CG Ex. 1.0, 20:362-374. ComEd adopted this correction in its Exhibit 51.2 (and replacement Ex. 75.2) primary exemplar ECOSS as well as its alternative exemplar ECOSS (ComEd. Ex. 51.3 and 75.3). This correction was made to the NCP-SEC factor[6] to make it consistent with ComEd's calculation of the NCP-SEC factor that ComEd used in preparing its initial ECOSS in ComEd Ex. 15.1 (and 51.1 and 75.1)[7] and with ComEd's distribution loss factor studies, which demonstrate that none of the non-residential classes from the Medium Load class and larger receive service through the secondary distribution lines. CG Ex. 1.0, pp.9-19.

If this error had not been corrected, the Medium and Large Load classes would have seen their overall revenue responsibility *increase* from the creation of a Primary class, even though the creation of the Primary class would *remove* nearly 5 million MWH from the Medium and Large Load classes. *Id*. at 8:179-181.

In addition to ComEd's cost witnesses, Staff witness Lazare accepted this correction as appropriate (Staff Ex. 26.0, pp.14-15), along with Kroger witness Townsend (Kroger Ex. 2.0, pp. 4-5, lns. 85-89), and no party has opposed the allocation correction.

[6] NCP-SEC stands for class non-coincident peak at secondary voltage level. The NCP-SEC issue concerns the allocation of secondary distribution line costs and is distinct from the NCP/CP issue that concerns the allocation of distribution substation and primary feeder line costs, which issue is the subject of Section VII.C.1.(d) and (e).

[7] For additional clarity, the correction applies to the cost studies where a separate primary class or subclasses are created. ComEd's original proposed ECOSS followed its historic allocation practice and does not contain the NCP-SEC error. ComEd's corrected preferred exemplar ECOSS (51.2 and 75.2) and alternative exemplar ECOSS (51.3 and 75.3) also do not contain the NCP-SEC error.

C. Potentially Contested Issues

1. Embedded Cost of Service Study Issues

d. NCP vs CP

e. Allocation of Primary Lines and Substations

These two sub-issues seem to be one and the same issue. Distribution substation and primary feeder line costs should be allocated on the basis of class non-coincident peak (NCP). This is consistent with industry practice, how ComEd designs such systems, how the Commission historically has treated such costs, and with the NARUC cost allocation manual. CG Ex. 1.0, p.22. IIEC provided additional information in its direct testimony that likewise showed that ComEd designs these substation and primary line facilities to meet both normal and extraordinary conditions throughout the year (and a given day) and the NCP factor best captures this design reality. IIEC Ex. 3.0, pp. 20-24. ComEd agreed with this approach. ComEd Ex. 50.0 (Garcia), p. 2, lines 26-27; ComEd Ex. 74.0 p.3 lns.61-62 ("ComEd has not wavered in its belief that NCP is the appropriate allocator").

VIII. RATE DESIGN

` C. Potentially Contested Issues

3. Class Definitions

b. New Primary Voltage Delivery Class vs. Primary Subclass Charges

ComEd witness Alongi justified the similar cost treatment of primary voltage customers within a single Primary class (found in ComEd's preferred exemplar rates) instead of diverse cost treatment in numerous primary subclasses (found in the alternative exemplar rates and in IIEC's proposal) because:

> a customer that takes service at a primary voltage from ComEd without any transformation is provided identical facilities (e.g., primary wire tap,

> fusing, and primary voltage metering) regardless of the load requirement and those facilities are different from the type of facilities provided to a typical secondary voltage customer (e.g., transformation to a secondary voltage, fusing, secondary voltage metering) in a demand-based class.

ComEd Ex. 73.0, 25:544-549. According to Mr. Alongi, those primary facilities "are very different from the facilities that are required to serve a secondary voltage customer with similar demand levels." *Id*. at 26:562-565. Mr. Alongi also pointed out that setting different primary and secondary subclass charges could actually result in secondary subclass customers subsidizing primary subclass customers. *Id*. at 28:622-627 (primary customer costs higher than for secondary customers at same demand level). Thus, trying to correct a perceived intraclass inequity may simply create an inequity going the other direction. Accordingly, the Commercial Group finds Mr. Alongi's cost explanation to be reasonable and supports ComEd's position.

4. Non-Residential

a. Movement Toward ECOSS Rates

The Commercial Group agrees with ComEd witness Hemphill that "ComEd's delivery revenue requirement should be fairly allocated to classes in accordance with the shares of ComEd's distribution costs that they cause." ComEd. Ex. 14.0, "List of Issues and Major Conclusions."

A number of representatives of the largest load classes insist that they deserve rate subsidies because of potential rate increases that may occur from moving to cost and/or in the case of the Railroad class, because of alleged benefits the Railroad class members provide to society. Staff proposed to reduce the amount of subsidy these classes receive by $6.3 million. Tr. 1247:21-1248:3 (Boggs). This Staff proposal to move rates closer to cost is a reasonable step, particularly in light of the Commission's 2007 rate case final order. Part of the reason for moving only 25% toward cost in that 2007 order was that the Commission was not sure that

ComEd's ECOSS in that case fully reflected cost. As the Commission stated at page 213 of the final order (emphasis added): "What is unclear, and will remain unclear until an ECOSS is evaluated in compliance with our findings above, is how significant the rate inequities are under this ECOSS." The Commission then went on to "accept ComEd's ECOSS with the following modification," i.e., that there be a four-step instead of two-step move toward ECOSS rates. *Id.* ComEd has now improved its ECOSS in this current rate proceeding incorporating many proposals of the subsidized customer classes. Accordingly, there is even less need to move slowly toward cost. Further, ComEd's proposed increases for the Railroad and High Voltage classes are only 4.6% and 7.4% respectively. ComEd. Ex. 49.1. Rate shock then cannot be the basis for a lower step up to cost because Witness Hemphill agreed that even increasing the rates for those classes by the system average of 14.8% would not constitute rate shock. Tr. 334:11-16.

In any event, to the extent that the Commission nevertheless determines that subsidies should continue, the subsidy burden should be spread to all other classes of customers and not to certain disfavored non-residential classes alone. *See* additional discussion at Section VIII.C.4.a.iii *infra*.

(iii) What classes should pay for any revenue shortfall from not moving to 100% ECOSS rates

The over 10MW load classes (now called the Extra Large Load and High Voltage classes) have received subsidies exceeding $23 million per year, at least since the conclusion of Docket No. 01-0423. CG Cross-Exhibit 1, p. 2. This annual subsidy, which does not include any subsidy paid to the railroad class, increased to over $29 million per year. *Id* at p. 2-3. For some obscure reason, only the customers in the Small to Very Large Load non-residential classes have been saddled with 100% of this subsidy burden. As this burden has continued for many years, if anything, these classes should receive below-cost rates. CG Ex. 2.0, p.4 lns. 79-81.

Customers in the Small to Very Large Load classes include retailers, industrials, schools, homeless shelters, and churches. *Id.* at p. 4, lns. 79-81. No witness in this proceeding could justify why it is fair for such customers to bear 100% of the subsidy burden when other non-residential classes, namely the Watt-Hour and Lighting classes, bear none of the subsidy burden. *See* Tr. 334:17-335:6 (Hemphill) and 890:16-22 (Lazare). Nor is it apparent why the subsidy burden should not be spread to all remaining classes. Although Mr. Alongi suggested that this would increase the rates of some customers currently at cost to rates somewhat above cost (ComEd Ex. 73.0 lines 226-28), spreading the burden in this broad manner would mean that no class would have their rates set higher than 6/10th of one percent above cost.[8]

Some of the subsidies are alleged to be due to societal benefits created by the classes being subsidized. *See* Metra Ex. 2.0 (congestion benefits) and CTA Ex. 2.0 (greenhouse gas benefits). But if all members of society (or at least the State of Illinois) benefit, the subsidy burden to pay for such benefit should also be spread as widely as possible. That is the only fair outcome.

b. Allocating Secondary Costs Among Customer Classes

Mr. Baudino corrected the proposed allocation of secondary distribution line costs in ComEd's exemplar Primary ECOSS to reflect that customers of Medium and larger load do not take service over the Company's secondary distribution lines. This correction has been accepted as appropriate by ComEd and Staff witnesses and not opposed by any party. *See* discussion at Section VII.B. *supra*.

[8] Under Staff's proposals, the subsidies to the three largest load classes would be approximately $13.2 million. Staff Ex. 29.0C, Sch. 29.01C, p.1 (sum of the "difference" column less the sum of the "Staff increase over Company" column). This amount represents 0.59% of the $2,237.6 million to be collected from non-subsidized classes. *See* Staff Ex. 29.0C, Sch. 29.01C, p.4 column B.

6. Distribution Loss Factors

During this proceeding, ComEd made a significant change to its SEC/SERVICES distribution loss factor that was not supported by substantial evidence and therefore should be rejected. However, to remove this issue from the contested issues list, the Commercial Group proposes a compromise position below.

The SEC/SERVICES factor refers to the losses through secondary distribution lines (SEC) and service lines (SERVICES) for the various customer classes. In its initial filing, ComEd continued its historic practice of assigning zero losses for the Medium Load, Large Load, and Very Large Load classes for secondary and service lines. *See* CG Ex. 1.0 p.17 Table 5. This reflects the fact that 1) secondary distribution lines are not used to serve customers above 100 kW in load (and therefore there are no losses from the SEC factor), and 2) the service lines (i.e., the SERVICES factor) for these classes are relatively short or non-existent (where larger customers are served directly from electric service stations).

Line losses are calculated by the formula: Loss = the square of the current through the line times resistance. Staff Ex. 6.0, 23:530-532. Resistance through a line is a factor of the length of the line and the cross-sectional size of the line. Tr. at 814-815 (Rockrohr). Staff witness Rockrohr testified that "services [to customers above 100 kW] are typically short and of larger conductor size"; hence, "there is little resistance in the service conductor" for such customers. Staff Ex. 6.0, p. 24, lns. 537-538. Although the resistance is small, Mr. Rockrohr concluded that the resistance "is not zero" and he added that more current may flow through these wires than for smaller load customers. *Id.* at lns. 540-47. He then recommended that ComEd assign value for SEC/SERVICE of 50% for the Medium Load class and 40% for the Large Load class, although he couched that recommendation by saying he "would consider

alternative non-zero percentages to represent losses in the services to members of the 100-400 kW and 400-1000 kW classes if a reasonable argument were to be presented for those alternative values." Staff Ex. 6.0, p. 25, lns. 564-566. During the hearings, Mr. Rockrohr candidly admitted that he had not performed a study to come up with the 50% and 40% estimates (Tr. 815, lns. 13-17), setting a particular value without a study was "largely guesswork" (Tr. 820, lns. 18-19), and that lower estimates could be reasonable. *Id*. at lines 3-11.

On rebuttal, ComEd witness Born adopted Mr. Rockrohr's recommendation saying only that "there are no secondary conductor losses" for Medium and Large Load classes but that "there are material energy losses in the service conductors used by customers in the 100-400 kW and 400-1000 kW classes." ComEd Ex. 34.0, 7:152-8:1. Notably, Mr. Born for ComEd also changed the SEC/SERVICES line losses for the Very Large and Extra Large Load classes from 0% to 5% in response to Mr. Rockrohr's testimony that some service line losses occur. But Mr. Rockrohr, when asked whether he agreed to this change for the Very Large and Extra Large Load classes, said only that he "[didn't] disagree with it" because "it's reasonable that there would be some losses" and that without a study of these losses, the analysis is similar to that for the Medium and Large Load classes. Tr. 816, line 14 -817, line 2. Thus, the changes from 0% to 50% and 40% are based solely on evidence that the losses are "greater than zero."

This type of conjecture is not substantial record evidence sufficient to support the large changes to the SEC/SERVICE factor that were made in this docket, particularly where other record evidence argues for much lower values for the Medium and Large Load classes. First, as discussed above, there are no SEC losses from the SEC/SERVICES factor and service lines to Medium and Large Load customers have a very low resistance because they are short and of significant size. The <u>only</u> explanation then for changing the SEC/SERVICES figure from 0% to

50% (Medium) and 40% (Large) is that the current flowing through such service lines may be larger than the current flowing through service lines serving customers under 100 kW.[9] But Very Large and Extra Large Load customers may have even higher levels of current flowing through their service drops (Tr. 819, lines 3-12), and yet Very Large and Extra Large Load customers are assigned only a 5% SEC/SERVICES value in the revised Distribution Loss Study. Combined with the fact that no losses occur through the SEC part, this indicates that the SEC/SERVICES amount assigned to the Medium and Large Load classes should be significantly lower than 50% and 40%. Third, the cost study of Mr. Heintz backs this up by showing that the cost assigned to the Medium and Large Load classes for service lines is only 0.7% and 0.25% respectively of ComEd's total service line cost.[10]

Accordingly, the correct SEC/SERVICES values for the Medium and Large Load classes are probably closer to the original 0% than 50% or 40% but what the exact values should be is guesswork. Because ComEd bears the burden of proof on this point, the loss factor change should be rejected, and ComEd should be directed to study this issue for its next Distribution Loss Study. Nevertheless, to remove this issue from the contested issues list, the Commercial Group offers that it would agree to a SEC/SERVICES factor of 20% for the Medium Load class and 10% for the Large Load Class until such study can be performed. Thus, the SEC/SERVICES factor would be: Medium (20%), Large (10%), Very Large (5%) and Extra Large (5%).

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[9] As noted above, current and resistance are the only two parts of the line loss formula and resistance admittedly is very low.

[10] *See* ComEd Ex. 15.1, Sch. 2A, p. 5, ln. 84. This Services line shows the allocation of approximately $3.1 million to the Medium Load class and $1.2 million to the Large Load class out of a "Total ICC" of approximately $465.7 million.

X. OTHER

C. Updated Distribution Loss Study

See discussion *supra* Section VIII.C.6.

XI. CONCLUSION

WHEREFORE, the Commercial Group respectfully requests that the Administrative Law Judges recommend, and the Commission order, the relief requested herein.

Respectfully submitted this 10th day of February, 2011.

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