

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

Order Instituting Rulemaking Regarding Policies, )	
Procedures and Rules for the Low Income Energy )	
Efficiency Programs of California's Energy )	Rulemaking 07-01-042
Utilities. )	(Filed January 25, 2007)
_____ )	

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS**  
**REGARDING LOW INCOME ENERGY EFFICIENCY PROGRAM OBJECTIVES AND**  
**GOALS**

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Dated: **April 27, 2007**

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**I.**

**INTRODUCTION**

Pursuant to the Scoping Ruling<sup>1</sup> issued on March 28, 2007 in Rulemaking (R.) 07-01-042 Regarding Policies, Procedures and Rules for the Low Income Energy Efficiency Programs of California’s Energy Utilities, Southern California Edison Company (SCE) provides these comments on the Low Income Energy Efficiency (LIEE) program goal and objectives raised in the March 23rd workshop (Workshop) and the Scoping Ruling.

SCE commends the Commission for its creative and ambitious approach to improving the LIEE program, and looks forward to working with stakeholders to implement LIEE in the coming years. SCE supports the general direction of the broad program goal and objectives proposed by ALJ Malcolm at the Workshop and as stated in the Scoping Ruling.

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<sup>1</sup> *Scoping Ruling for the Commission’s Rulemaking on the Low Income Energy Efficiency Programs of California’s Energy Utilities.*

SCE also shares the Commission's commitment to expanding resource benefits and energy savings for low income customers, and believes it is possible to accelerate these efforts before 2009. Based on the Commission's consideration of the proposed goal, SCE is currently developing a proposal to offer 6 million compact fluorescent bulbs (CFLs) to 1 million households in predominantly low income neighborhoods during 2007 and 2008.<sup>2</sup> This proposal, if approved by the Commission, will enable SCE to quickly augment the current LIEE program with significant resource benefits and bill savings for customers.

The Commission's focus on LIEE as an energy resource is appropriate, and can be accomplished without sacrificing other essential program objectives that are met through the portfolio of LIEE measures and services. These comments provide more detail on how SCE believes the Commission's program goal and objectives should be defined and how they can be successfully achieved.

## II.

### COMMENTS

#### A. Proposed Broad Program Objectives

##### 1. Are the Proposed Broad Program Objectives Appropriate?

The Scoping Ruling directed the parties to discuss whether the following broad program objectives are appropriate for LIEE, and if not, to propose others:

- Affordability of energy services by low income customers;
- Reducing the burdens of energy bills of low income customers;
- Equity for low income customers;
- Safety and comfort of low income customers;

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<sup>2</sup> SCE plans to file an application regarding this proposal within the next few weeks.

- Energy system reliability and cost-effectiveness (LIEE as an energy resource);  
and
- Environmental quality and reduction of green house gasses.

SCE agrees that these broad program objectives are appropriate for LIEE.

However, SCE recommends that energy system reliability and cost-effectiveness be listed as separate objectives.

SCE agrees that the objectives of energy system reliability, environmental quality and reduction of green house gases are timely, appropriate and important for the future of LIEE. The current LIEE program contributes to energy system reliability as an energy resource. For instance, in 2006, SCE’s LIEE program installations produced annual energy savings of nearly 26,800 MWh.<sup>3</sup> SCE projects energy savings of nearly 47,000 MWh and demand reduction of 8.5 MW for its 2007-2008 program.<sup>4</sup> These energy resource benefits can be converted to quantifiable estimates of reduced CO<sub>2</sub> emissions and reflect tangible environmental benefits. However, energy system reliability and cost-effectiveness should be listed separately because certain measures can promote energy system reliability without necessarily being cost-effective.<sup>5</sup>

SCE also agrees that the other stated objectives are appropriate. Affordability of energy services, reducing energy burden, equity for low income customers, and safety and comfort have long been objectives of the LIEE program, and it is important they remain so.<sup>6</sup> As incentive programs were adopted for conservation and energy efficiency in the 1980s, there was concern that low income customers could not afford the up-front investment required to receive

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<sup>3</sup> 2007 Low Income Energy Efficiency Annual Report for PY 2006, to be submitted May 1, 2007.

<sup>4</sup> See Appendix D of *Testimony of Southern California Edison Company in Support of Application for Approval of Low Income Assistance Programs and Budgets for Program Years 2007 and 2008*.

<sup>5</sup> The current LIEE program is comprised of a number of measures, most of which produce energy savings. Some, such as CFLs, produce energy savings and are highly cost-effective. Refrigerators typically are the largest energy user in most low income households and offer the greatest single opportunity to increase efficiency and lower energy bills. Some measures provide comfort and safety benefits while directly reducing on-peak demand.

<sup>6</sup> See e.g., Cal. Pub. Util. Code § 327 (“In administering the programs described in Section 2790, the electric and gas corporations, to the extent practicable, shall ... [w]ork to reduce consumers electric and gas consumption, and bills ...”); Cal. Pub. Util. Code § 382 (“... the Commission shall ensure that low-income ratepayers are not jeopardized or overburdened by monthly energy expenditures ...”)

energy efficient measures and subsequent rebates. Low income customers pay a disproportionate amount of their income on energy and other household bills, and have few options available for the direct purchase of or financing for household appliances. To promote equitable access to energy efficiency opportunities, direct install weatherization programs were implemented that targeted low income customers. SCE expanded these early programs to include electric appliances such as early CFLs and evaporative coolers. These measures provided energy savings and addressed safety and comfort issues for customers living in hotter climates. The availability of no-cost services through LIEE provides income-qualifying customers the opportunity to participate in energy efficiency efforts where they otherwise would not be able to.

The safety and comfort of low-income households is also of paramount importance to SCE. This objective sets LIEE apart from traditional energy efficiency programs. Customers who live in hot climate areas carry a heavy energy burden, and many times do not have an alternative to relief from high temperatures other than to run a cooling system. As a single-source electric utility with a service area that experiences summer temperatures that regularly exceed 100 degrees, SCE believes that LIEE should continue to be used as a vehicle to provide efficient cooling that can help protect vulnerable customers from potential health risks associated with inadequate cooling.

## **2. How Should the Proposed Broad Program Objectives Be Articulated and Prioritized?**

The Scoping Ruling directs the parties to comment on how these potentially competing broad program objectives should be articulated and prioritized. SCE believes that each of the stated program objectives is an important part of the future of LIEE, and significant time should not be spent debating their relative importance. For the most part, the proposed program objectives are compatible and can be addressed within the portfolio of measures offered

through the LIEE program.<sup>7</sup> SCE's current LIEE program attempts to achieve these collective objectives by providing comprehensive energy efficiency improvements to homes that enhance energy system reliability while simultaneously reducing the energy burden of high energy bills and increasing safety and comfort. This is particularly evident in services delivered to customers in extreme climates areas.<sup>8</sup> At this point, however, SCE does not believe that cost-effectiveness should take priority over the other stated objectives.

Maintaining cost-effectiveness as the first priority will conflict with some of the other program objectives to the extent that non-energy-benefits that may be used to address health, safety, and comfort are continuing to develop. SCE believes more work needs to be done in this area before there can be a high degree of confidence that non-energy benefits are adequately accounted for.

SCE believes sufficient time has elapsed since adoption of the Modified Participant Test for LIEE programs<sup>9</sup> such that it is now appropriate to revisit the issue of how cost-effectiveness should be evaluated for low income programs and measures. In 2001, the Commission adopted the Modified Participant Test and the Utility Cost Test as appropriate measures for the cost-effectiveness of low income programs.<sup>10</sup> Both tests incorporate non-energy benefits.<sup>11</sup> The Commission uses the Total Resource Cost test to measure energy

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<sup>7</sup> That said, however, SCE recognizes that individual measures vary on the extent to which they address the individual program objectives. Sometimes the greatest benefit (such as increased safety and comfort from an efficient air conditioning system in an extreme climate area) will not always translate into the greatest bill savings. Although it is expected that most customers will experience bill savings from having a more energy efficient air conditioner installed, some customers, particularly those with inoperable units, may experience an increase in their bills. Additionally, some measures may provide greater benefit in some areas, e.g., energy system reliability, environmental quality, and reduction of greenhouse gases, and less benefit related to safety and comfort. As noted above, compact fluorescent bulbs and refrigerators provide ongoing resource benefit and bill savings; air conditioner replacements and evaporative coolers address safety and comfort and produce summer on-peak demand reduction and outdoor CFLs produce energy savings and safety through improved security lighting, but do not produce on-peak demand reduction.

<sup>8</sup> This also highlights the issue that different regions may have different objective priorities. For instance, while health and safety might rank as the first priority for areas with high temperatures, it may have a much lower ranking in coastal areas where air conditioning is not commonly used.

<sup>9</sup> D.01-12-020, Ordering Paragraph 9, dated December 12, 2001.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

efficiency programs as alternatives to supply-side options. Thus, cost-effectiveness test results are not directly comparable for LIEE and EE programs. Given that most low income participants receive significant subsidies on their energy bills due to the CARE rate, SCE recommends that additional analysis be conducted in this area to ensure that any reduction in CARE subsidies for customers installing energy efficient equipment is properly integrated into a cost-effectiveness analysis and that the prior work on non-energy benefits receive additional refinement. While cost-effectiveness can provide a useful means of comparing different measures within the LIEE program, the focus on cost-effectiveness should not delay the Commission's attention to the other program objectives.

## **B. Proposed Broad Goal Statement**

### **1. Is the Proposed Goal Statement Reasonable?**

The Scoping Ruling directs the parties to comment on whether the following proposed broad goal statement for LIEE is reasonable from the standpoint of law, Commission policy and community needs:

To assure that the residence of every low income customer in California is energy efficient by 2015.

SCE believes the goal can be appropriate with modification. SCE proposes that the goal be revised to state:

To assure that the residence of every low income customer in California is ***more*** energy efficient by 2015.

To suggest a home is "energy efficient" suggests that a complete efficiency standard in each home is attainable. This is not the case. Technologies will continue to evolve up through and beyond 2015. Equipment that is efficient today will not be efficient in 2015 as the natural cycle of innovation and obsolescence transpires. In its present form, the goal would seem to indicate that "energy efficient" is an end result to be achieved by installing *all* feasible measures. The Commission may decide that it is instead preferable to reach *all* homes (with

fewer measures) in light of program costs and rate impacts. The goal as revised by SCE remains straightforward, and would allow the Commission and stakeholders to coalesce their efforts toward achieving the proposed program objectives, including resource adequacy, greenhouse gas reduction, and improved comfort and safety for low income customers. Further, the Commission and stakeholders would be able to develop a better understanding through the Low Income Needs Assessment and subsequent market characterization studies of the unmet need and energy savings potential for various measures and the right level of investment that should be encouraged to install the appropriate series of measures. Moreover, the modified goal as proposed by SCE would provide immediate direction to the utilities to provide energy efficiency to all low income households while leaving open whether that would be accomplished through the installation of one, two, or the whole series of measures currently provided through the LIEE program.

**2. How Should the Commission Define the Elements of the Proposed Broad Goal?**

The Scoping Ruling asks the parties to comment on how elements of the broad goal statement should be defined to assure that it is clear, efficacious and reasonable. As discussed at the Workshop, many elements of the goal statement must be clarified and defined in order for the goal to be realistic and attainable. Terms such as “energy efficiency” and “residence” and “every low income customer” could have drastically different meanings depending on their context and the perspective from which they are defined. Further, as discussed above, given the frequent technological advances in appliance efficiency and the fact that many low income customers are renters and move often, it would be unrealistic – indeed impossible – to assure that by the end of 2015 each and every home that each and every low income customer may reside in will be completely energy efficient according to 2015 standards. Accordingly, SCE suggests the following definitions to make this goal more feasible.



SCE proposes that the Commission define “every low income customer” as CARE-participating households. CARE customers could be defined as those enrolled as of December 31, 2008.<sup>12</sup> This definition provides the utilities with a defined and targeted set of eligible customers who are more likely to participate in LIEE. For instance, because the customer is already participating in CARE, he/she is less likely to decline LIEE services because of perceived “welfare stigma.” The alignment of the CARE and LIEE eligibility provides a unique opportunity to offer low income customers energy efficiency services through LIEE and simultaneous bill reductions through CARE (and possibly a gradual reduction in the total CARE subsidy due to increased energy efficiency).

With respect to the meaning of “energy efficiency”, in Appendix B of D.05-04-051, the Commission adopted the following definition:

Activities or programs that stimulate customers to reduce customer energy use by making investments in more efficient equipment or controls that reduce energy use while maintaining a comparable level of service as perceived by the customer.

SCE believes this is an appropriate definition for “energy efficient” as used for the proposed goal statement.

Additionally, SCE proposes that 2015 be considered an initial placeholder. The target year may be adjusted depending on approved budget increases and the impacts on other ratepayers.

Also, while likely obvious, SCE wishes to clarify that the utilities would only be responsible for serving those low income customers within their respective service territories and not all low income households within California.

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<sup>12</sup> Of course, SCE would endeavor to provide all CARE customers with LIEE services to the extent new customers enroll in CARE beyond 2008. However, just as there are barriers to assuring that every low income household is “energy efficient” by 2015 (as described above), there are practical barriers to assuring that every CARE customer enrolled by December 31, 2015 will be served by LIEE (e.g., new customer enrolls in late 2015, thereby preventing SCE from reaching them with LIEE services by the end of the year).

Finally, as with the CARE goals (to enroll all eligible customers who are willing to participate), the proposed LIEE goal should be measured by those households who are willing to participate.<sup>13</sup>

To the extent these proposed definitions and clarifications require additional modification to the goal statement in order to avoid confusion, such revisions should be made.

### **3. Should the Broad Program Goal Be Applied to All LIEE Program Measures?**

The Scoping Ruling asks the parties to comment on whether the broad program goal should be applied to all program measures or if the Commission should treat some program measures separately from the goal statement.

Limiting the goal to fewer measures could facilitate the achievement of the goal. At the same time, SCE believes energy efficient lighting, cooling measures, and refrigerators are essential elements and services that would meet the Commission's objectives. Refrigerators and CFLs provide the greatest cost-effective resource benefit to the State and simultaneously reduce the burdens of energy bills on low income customers. Cooling measures provide coincident peak reduction during the hottest summer months and comfort, health and safety to customers. Energy education has also proven to be a valuable component of energy efficiency programs.<sup>14</sup> As an electric-only utility, these measures constitute virtually all of the services SCE provides in today's LIEE program.<sup>15</sup> While SCE believes these measures are all essential to the LIEE

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<sup>13</sup> For instance, the utilities could track households that decline to accept the offer of LIEE services. These households would count towards the goal.

<sup>14</sup> Sometimes a home only qualifies for energy education. Experience has shown that energy efficiency programs increase energy savings and enhance the persistence of savings by providing customer education. Education helps the customer feel more committed to the program and gives the customer a level of control over their energy usage and savings.

<sup>15</sup> As an electric-only utility, SCE estimates only 10% of its customers have electric space heating. This data is obtained periodically through the Residential Appliance Saturation Survey (RASS), which was most recently issued by the California Energy Commission in 2004. Weatherization services are provided primarily by the gas utilities, as weatherization services are based off of the source of the household's heating (which is typically gas). Thus, SCE provides minimal weatherization and insulation services (e.g., insulation, caulking, and door weatherstripping). For instance, in 2006, SCE provided ceiling insulation to 1 home and caulking and door weatherstripping to less than 400 of the more than 50,000 homes treated in 2006. Accordingly, providing

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program, SCE also believes that it is premature to apply the goal to all measures without a better indication of the impacts on program cost and rates.

With respect to the proposed goal statement, as modified by SCE, the goal could be achieved either by continuing to offer all feasible measures to all customers by 2015, or by offering a limited tier of measures. Thus, the Commission could quickly adopt the goal as modified by SCE while subsequent planning efforts could lead to further Commission policy regarding the appropriate mix of measures that should be implemented for the 2009-2011 LIEE program.

**4. Should Other Broad Program Goals Be Considered?**

The Scoping Ruling suggests that energy savings goals could also be a broad LIEE goal. SCE believes that energy savings goals may be appropriate at some point in the future, but may conflict with the overall goal of ensuring that all low income households receive energy efficient measures and that other program goals such as safety, comfort, and hardship are addressed. For example, the portfolio of activities could be weighted toward activities that produce greater energy savings at the expense of activities that produce less savings, but are essential to safety and comfort. SCE believes more analysis regarding the potential for energy savings for individual measures and households should be conducted prior to establishing energy savings goals.

**5. What Questions Must Be Addressed in Order to Implement LIEE to Achieve the Goal Statement?**

The Scoping Ruling asks the parties to comment on what questions the Commission must address in order to implement programs toward the broadly stated goal:

“...[Q]uestions might include: (1) how should the utilities’ current LIEE program be modified to recognize the goal? (2) what types of

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weatherization services to only a handful of homes should not have a significant impact on SCE’s ability to serve an increased number of households per year.

strategies would be required to meet the goal? And (3) should the Commission apply the goal to only a subset of measures?”

Many of these questions are raised and preliminarily addressed above. The aggressive goal statement also raises some of the same questions and concerns raised by the utilities with respect to LIEE “penetration rates” and what constitutes a “treated home.”

As identified in Phase I of the Needs Assessment, “concepts of LIEE potential and penetration are considerably more complex than concepts associated with the CARE program” and depend on a variety of factors, including income eligibility (e.g., changes in household income/size and changes in income eligibility requirements), space and water heating fuels, previous program participation, the need for LIEE measures, measure decay, changes in housing stock, changes in measures offered, etc.<sup>16</sup> These complexities remain to be resolved.

Additionally, SCE believes that the Commission should consider Investor Owned Utility (IOU)-specific needs when determining strategies for meeting the goal. For instance, SCE’s territory contains the greatest amount of desert area than any other IOU. Because SCE has proportionately more desert region than the other IOUs, it is reasonable to assume that the need for cooling measures is also greater.

Another issue that should be addressed is the use of CEC Climate Zones (CZs) to determine measure eligibility. Existing CZs are too large and exclude customers from receiving measures, who based on the weather conditions in their communities, would otherwise be eligible. The possibility of shifting to smaller geographic areas and away from CZs should receive future consideration.<sup>17</sup>

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<sup>16</sup> Low-Income Needs Assessment Phase 1 Report, Section 3.3.

<sup>17</sup> The issue of which measures should be offered in which CZs has been discussed in the past, most recently in the proceeding to consider approval of the utilities’ 2007-2008 low income assistance programs.

**6. What Criteria Should Be Considered in Determining Strategies for Meeting the Goal?**

The Scoping Ruling also asks the parties to address the kinds of criteria that should be considered for meeting the goal, and how those criteria should be ranked. A number of SCE's responses to questions above also are relevant here. One item that has not been directly addressed relates to previously treated homes. SCE proposes that homes that have received LIEE services in prior years should count toward meeting the goal. The utilities should not be required to treat homes again prior to 2015 when there may not be a programmatic reason to do so.

SCE also proposes that the Commission consider categorical eligibility for LIEE as future strategy for meeting the proposed goal. Recently, in D.06-12-038, the Commission approved categorical eligibility for CARE for customers participating in a means-tested program that has income guidelines at or below that of CARE. Categorical eligibility provides a more streamlined approach to providing low income assistance program services to customers. SCE suggests that consideration be given to this approach for delivering LIEE services. For instance, designated public housing units could be categorically eligible for LIEE services (if the income guidelines for residency are at or below those of LIEE). SCE could work with public housing authorities in identifying eligible units. This categorical eligibility approach for LIEE services could minimize the seek-and-find approach that can be more time consuming.

**C. Estimates of the Costs to Meet this Goal**

The Scoping Ruling asks the utilities to include in their comments a "very rough estimate of the costs of meeting this goal" and an "estimate of the number of households in need of energy efficiency measures." The Commission acknowledged that the utilities would provide these estimates "with the understanding that no party is committing to their precision or accuracy and that they would be used only as a way of measuring the preliminary impact of the Commission's program objectives and goal." With this understanding, SCE has developed two

funding scenarios based on the Commission's proposed goal of assuring that the residence of every low income customer is energy efficient by 2015. By providing these estimates, SCE is in no way at this time endorsing the projected increases in funding. Considerable work needs be done (e.g., assessment of rate impacts, etc.) before any significant funding increase is approved.

Using demographic information gleaned from CARE eligibility estimates, the total eligible population for LIEE sits at 1,354,888. A total of 349,884 customers have been served within the last eight years and therefore the eligible population would be adjusted to 1,005,004. An estimated 6.73%<sup>18</sup> of customers are expected to be assessed without any measures recommended for installation (just energy education). This is consistent with existing trends. This leaves the total eligible population at 937,367.

Without the benefit of the final release of the Low Income Needs Assessment Study or market characterization studies, SCE has used existing installation frequencies to arrive at totals for the first scenario and has adjusted an assumption regarding refrigerators for the second scenario. Both scenarios use the same base number, which as described above, was adjusted to reflect previous participation and drop-offs.

#### Scenario 1

Under the first scenario, using the same mix of measures currently approved (with the exception of heat pumps, air conditioner maintenance and evaporative cooler maintenance), it is expected that the frequency of measure installation will be consistent with current trends. This includes 90% installation rate of CFLs, 50% installation rate of refrigerators and 13% installation rate for cooling measures. The total seven year budget is estimated at \$754.1 million (or approximately \$107.7 million per year; more than a three-fold increase over the currently authorized \$32.5 million for 2007 and 2008).

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<sup>18</sup> The 6.73% represents 67,637 customers that will receive enrollment measures (energy education), at a cost of approximately \$1 million.

## Scenario 2

The second scenario operates under the same assumptions as above, except adjusts the installation rate for refrigerators. The penetration rate of refrigerators is consistently rising, and with a pre-1993 eligibility requirement, the frequency of installations is predicted to fall to 20% the first two years and to 10% the following years. The total estimated seven year budget under this scenario is \$452.1 million.

### **III.**

#### **CONCLUSION**

SCE appreciates the opportunity to submit these comments and looks forward to working with the Commission and interested parties in improving the LIEE program.

Respectfully submitted,

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April 27, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS REGARDING LOW INCOME ENERGY EFFICIENCY PROGRAM OBJECTIVES AND GOALS on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **27th day of April, 2007**, at Rosemead, California.

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**R.07-01-042**

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**R.07-01-042**

Friday, April 27, 2007

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**R.07-01-042**

Friday, April 27, 2007

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**R.07-01-042**

Friday, April 27, 2007

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**R.07-01-042**

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