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October 2, 2017

VIA EXPRESS MAIL

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RECEIVED

OCT - 2 2017

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Inspection, Maintenance, Repair and Replacement Standards For Electric
Distribution Companies, Docket No. M-2009-2094773**

**Biennial Filing of UGI Utilities, Inc. - Electric Division for the period of January 1,
2019 through December 31, 2020 pursuant to 52 Pa. Code §57.198**

Dear Secretary Chiavetta:

Enclosed for filing please find a copy of UGI Utilities, Inc. – Electric Division’s Biennial Plan for the Periodic Inspection, Maintenance, Repair and Replacement of Facilities for the period of January 1, 2019 through December 31, 2020 filed in accordance with the provisions of 52 Pa. Code §57.198.

Should you have any questions concerning this filing, please feel free to contact Eric Sorber whose contact information is included with the plan.

Respectfully submitted,

Mark C. Morrow

Counsel for UGI Utilities, Inc. – Electric Division

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Biennial Inspection, Maintenance, Repair and Replacement Plan
of UGI Utilities, Inc. – Electric Division
For the period of January 1, 2019 – December 31, 2020**

Submitted by:

**Eric W. Sorber
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Dated: October 2, 2017

UGI Utilities, Inc.

2019 – 2020 Inspection and Maintenance Plan

Section 57.198 (b). Plan Consistency. The plan must be consistent with the National Electrical Safety Code, Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Energy Regulatory Commission Regulations and the provisions of the American National Standards Institute, Inc.

This UGI Utilities, Inc. (UGI) plan shall be consistent with the National Electrical Safety Code, Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Energy Regulatory Commission Regulations and the provisions of the American National Standards Institute, Inc. as applicable to the work performed.

Section 57.198 (m). Recordkeeping. An EDC shall maintain records of its inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair, and replacement programs as required by subsection (n). The records shall be made available to the Commission upon request within 30 days. Examples of sufficient records include:

- (1) Date-stamped records signed by EDC staff who performed the tasks related to inspection.
- (2) Maintenance, repair and replacement receipts from independent contractors showing when and what type of inspection, maintenance, repair or replacement work was done.

UGI Utilities, Inc. (UGI) shall maintain records of its inspection and maintenance activities in the form of date stamped paper records signed by UGI staff; maintenance, repair, and replacement receipts from independent contractor and/or equivalent computer based records indicating the nature of the work performed.

Section 57.198 (n) (1). Vegetation Management. The minimum inspection and treatment cycle for vegetation management shall be between 4 - 8 years for overhead distribution facilities. An EDC shall submit a condition based plan for vegetation management for its overhead distribution system facilities explaining its treatment cycle.

Vegetation Management Line Inspection

UGI Utilities, Inc. (UGI) has forty-four (44) overhead distribution circuits on its system. The total miles of overhead primary line on these circuits is approximately 1099.20 miles. The circuits are all located in Luzerne and Wyoming Counties in Pennsylvania.

UGI will perform a vegetation management inspection on all its primary overhead distribution facilities every two years in conjunction with its distribution overhead line inspection. Approximately half the circuit mileage will be inspected each year. The purpose of the vegetation management inspection is to assess the condition of vegetation on and off the lines' right of way to identify situations that may pose a threat to reliability of service or damage the overhead distribution facilities. The inspection schedule for 2019 and 2020 is shown below:

UGI Utilities, Inc.
 2019 – 2020 Inspection and Maintenance Plan

	Feeder	Vegetation Management Line Inspection Planned <i>1099.20 circuit miles</i>	
		2019	2020
UGI Utilities, Inc. <i>1099.20 circuit miles</i>	Courtdale 8000	0	39.66
	Courtdale 8002	0	8.73
	Courtdale 8003	0	5.79
	Dallas 350	0	11.64
	Dallas 1930	0	5.67
	Dallas 1954	0	4.31
	Glenview 370	0	6.19
	Glenview 372	0	18.54
	Glenview 8004	0	48.41
	Hunlock 419	19.83	0
	Hunlock 420	123.86	0
	Hunlock 421	48.64	0
	Huntsville 240	0	22.90
	Huntsville 242	0	54.45
	Huntsville 244	0	71.90
	Huntsville 757	0	1.70
	Kingston 315	0	9.37
	Kingston 1215	0	4.29
	Kingston 2530	0	8.97
	Kingston 2555	0	1.63
	Koonsville 7536	35.32	0
	Koonsville 7540	156.71	0
	Huntington Mills 8	40.77	0
	Kunkle 500	0	31.34
	Kunkle 510	0	40.89
	Kunkle 520	0	57.39
	Lincoln 602	14.51	0
	Lincoln 603	7.82	0
	Lincoln 604	15.66	0
	Lincoln 606	14.80	0
	Plymouth 10	6.30	0
	Plymouth 23	10.50	0
	Plymouth 45	15.57	0
	Plymouth 67	5.78	0
	Plymouth 80	41.62	0
	Swoyersville 116	0	13.51
	Swoyersville 147	0	20.35
	Swoyersville 216	0	6.09
	Swoyersville 237	0	5.57

UGI Utilities, Inc.
 2019 – 2020 Inspection and Maintenance Plan

	Swoyersville 247	0	17.03
	Swoyersville 347	0	6.02
	Hanover 70	12.22	0
	Hanover 75	1.72	0
	Hanover 8005	5.24	0

Vegetation Management Treatment Plan

UGI will annually form a condition based vegetation management treatment plan. This plan will be based largely on the results of its vegetation management line inspection. Other factors, utilized in conjunction with the vegetation management line inspection are the number of tree caused interruptions on that feeder in the past year and the established maintenance cycle time for that feeder.

For 2019 and 2020, UGI plans to perform vegetation maintenance trimming work on 150 – 200 miles of distribution overhead lines each year. This work involves pruning or removal of approximately 30,000 – 40,000 trees on its system. UGI plans to chemically treat 50 - 120 miles of distribution overhead lines each year. This work involves the herbicide application of approximately 100 – 300 acres of distribution overhead line right of ways.

Vegetation Treatment Cycle

UGI has established expected vegetation line treatment cycle times for its distribution circuits. The cycle times result from the operation of the vegetation management treatment plan described above. The treatment cycles range from four to eight years. The expected treatment cycles for each of UGI's forty-four (44) distribution circuits are shown in the table below:

	FEEDER	EXPECTED TREATMENT CYCLE in years
1	Courtdale 8000	6
2	Courtdale 8002	6
3	Courtdale 8003	6
4	Dallas 350	7
5	Dallas 1930	7
6	Dallas 1954	7
7	Glenview 370	7
8	Glenview 372	7
9	Glenview 8004	7
10	Hunlock 420	8

UGI Utilities, Inc.
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11	Hunlock 421	7
12	Huntsville 240	7
13	Huntsville 242	7
14	Huntsville 244	7
15	Kingston 315	4
16	Kingston 1215	4
17	Kingston 2530	4
18	Kingston 2555	4
19	Koonsville 7536	8
20	Koonsville 7540	8
21	Huntington Mills 8	8
22	Kunkle 500	7
23	Kunkle 510	8
24	Kunkle 520	7
25	Lincoln St 602	5
26	Lincoln St 603	5
27	Lincoln St 604	5
28	Lincoln St 606	5
29	Plymouth 10	5
30	Plymouth 23	5
31	Plymouth 45	5
32	Plymouth 67	5
33	Plymouth 80	7
34	Swoyersville 116	6
35	Swoyersville 147	6
36	Swoyersville 216	6
37	Swoyersville 237	6
38	Swoyersville 247	6
39	Swoyersville 347	6
40	Hanover 70	6
41	Hanover 75	6
42	Hanover 8005	6
43	Hunlock 419	6
44	Huntsville 757	6

UGI Utilities, Inc.

2019 – 2020 Inspection and Maintenance Plan

Justification

This inspection plan complies with the Docket No. M-2009-2094773 of the Pennsylvania Public Utility Commission. The time frames fall within the allotted time frame as outlined by the Pennsylvania Public Utility Commission and no waiver is being requested.

Section 57.198 (n) (2). Pole Inspections. Distribution poles shall be inspected at least as often as every 10-12 years except for the new southern yellow pine creosoted utility poles which shall be initially inspected within 25 years, then within 12 years annually after the initial inspection. Pole inspection must include:

- (i) Drill tests at and below ground level.
- (ii) A shell test.
- (iii) Visual inspection for holes or evidence of insect infestation.
- (iv) Visual inspection for evidence of unauthorized backfilling or excavation near the pole.
- (v) Visual inspection for signs of lightning strikes.
- (vi) A load calculation.

Program Description

UGI will inspect all distribution poles on a 10-12-year cycle. The purpose of these inspections is to maintain system reliability and safety by ensuring that all poles meet or exceed minimum strength requirements to support their attached facilities, that the poles and associated attachments are free from damage, and that no environmental conditions exist that may compromise the poles and associated attachments. A maintenance and treatment program done in conjunction with the distribution pole inspections aims to extend the useful life of the pole.

All poles will be inspected for decay, damage, illegal attachments, and potential hazards associated with electrical equipment. Poles suspected of having internal decay will be inspected by the sound and bore method. Poles manufactured greater than 20 years before the inspection date will be inspected below ground level whenever possible. The remaining strength of the pole will be calculated using data gathered from the inspection. If the remaining strength of the pole is found to be deficient, the pole will be classified as a reject pole (a pole that fails the ground-line inspection but does not meet the definition found in Section 57.198(n)(3) of the Pennsylvania Code, Title 52), a re-enforceable reject pole (a pole that can be restored to an acceptable strength when re-enforced with a steel truss or similar device), or a danger pole (danger poles meet the definition found in Section 57.198(n)(3) of the Pennsylvania Code, Title 52).

Further details can be found in UGI's T&D Engineering Instruction Manual, Section 10.8.

UGI Utilities, Inc.
 2019 – 2020 Inspection and Maintenance Plan

Pole Inspection Plan

UGI Utilities, Inc.	Area	Pole Inspections Planned (Number of Poles)	
		2019	2020
Approximately 45,000 distribution poles, system wide	All or portions of Conyngham Township and Newport Township	1250	0
	All or portions of Courtdale, Dallas Township, Jackson Township, Kingston Township, Larksville, Plymouth Township, Wyoming and West Wyoming	2500	3750

Justification

UGI's Pole Inspection Program meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (2). No waiver is being requested.

UGI Utilities, Inc.
2019 – 2020 Inspection and Maintenance Plan

Section 57.198 (n) (3). Pole Inspection Failure. If a pole fails the ground-line inspection and shows dangerous conditions that are an immediate risk to public or employee safety or conditions affecting the integrity of the circuit, the pole shall be replaced within 30 days of the date of inspection.

Corrective Maintenance

UGI will replace all poles that meet the definition found in Section 57.198(n)(3) within 30 days of the date of inspection. Recent history has shown that only .07% of all UGI poles inspected (less than three (3) poles per year on a 12-year cycle) have met this definition. As such, UGI maintains adequate inventory and manpower to replace these poles and associated materials within 30 days of the date of inspection.

Poles requiring corrective maintenance but not meeting the definition found in 57.198(n)(3) will be addressed in a timely manner, usually within 6 months of the date found.

Justification

UGI's Corrective Maintenance Program meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n)(3). No waiver is being requested.

UGI Utilities, Inc.

2019 – 2020 Inspection and Maintenance Plan

Section 57.198 (n) (4). Distribution Overhead Line Inspections. Distribution lines shall be inspected by ground patrol a minimum of once every 1-2 years. A visual inspection must include checking for:

- I. Broken insulators.
- II. Conditions that may adversely affect operation of the overhead transformer.
- III. Other conditions that may adversely affect operation of the overhead distribution line.

Program Description

UGI will conduct inspections of its overhead distribution facilities by ground patrol every two years. The purpose of the inspection program is to verify that the overhead facilities are in a safe, operational, and reliable condition. The inspections will be performed by a qualified company representative. The overhead lines and equipment will be inspected for damage including broken insulators, leaks, and any other conditions which may adversely affect the distribution system. Inspection information will be documented and forwarded to the appropriate engineering department when corrective action is required.

Further details can be found in UGI's T&D Engineering Instruction Manual, Section 02-02.

Distribution Overhead Line Inspection Plan

	Feeder	Overhead Line Inspections Plan	
		<i>(miles)</i>	
		2019	2020
UGI Utilities, Inc. <i>46 circuits</i> <i>(1099.5 circuit miles)</i>	Courtdale 8000	0	39.7
	Courtdale 8002	0	8.7
	Courtdale 8003	0	5.8
	Dallas 350	0	11.6
	Dallas 1930	0	5.7
	Dallas 1954	0	4.3
	Glenview 370	0	6.2
	Glenview 372	0	18.5
	Glenview 8004	0	48.4
	Hanover 0070	12.2	0
	Hanover 0075	1.7	0
	Hanover 8005	5.2	0
	Hanover 8006	0.1	0

UGI Utilities, Inc.

2019 – 2020 Inspection and Maintenance Plan

	Hanover 8007	0.1	0
	Hanover 8010	0.1	0
	Hunlock 419	19.8	0
	Hunlock 420	123.9	0
	Hunlock 421	48.6	0
	Huntsville 240	0	22.9
	Huntsville 242	0	54.4
	Huntsville 244	0	71.9
	Huntsville 757	0	1.7
	Kingston 315	0	9.4
	Kingston 1215	0	4.3
	Kingston 2530	0	9.0
	Kingston 2555	0	1.6
	Koonsville 7536	35.3	0
	Koonsville 7540	197.5	0
	Kunkle 500	0	31.3
	Kunkle 510	0	40.9
	Kunkle 520	0	57.4
	Lincoln Street 602	14.5	0
	Lincoln Street 603	7.8	0
	Lincoln Street 604	15.7	0
	Lincoln Street 606	14.8	0
	Plymouth 10	6.3	0
	Plymouth 23	10.5	0
	Plymouth 45	15.6	0
	Plymouth 67	5.8	0
	Plymouth 80	41.6	0
	Swoyersville 116	0	13.5
	Swoyersville 147	0	20.4
	Swoyersville 216	0	6.1
	Swoyersville 237	0	5.6
	Swoyersville 247	0	17
	Swoyersville 347	0	6

Justification

UGI Utilities, Inc.

2019 – 2020 Inspection and Maintenance Plan

UGI's Distribution Overhead Line Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (4). No waiver is being requested.

UGI Utilities, Inc.
2019 – 2020 Inspection and Maintenance Plan

Section 57.198 (n) (5). Inspection Failure. If critical maintenance problems are found that affect the integrity of the circuits, they shall be repaired or replaced no later than 30 days from discovery.

Corrective Maintenance

Any deficiencies on UGI's overhead distribution system discovered during performance of its Distribution Overhead Line Inspections will be addressed based on the severity of the situation. Those items that may affect the integrity of circuits will be repaired or replaced within 30 days of discovery. Safety issues will be addressed immediately.

UGI maintains adequate inventory and manpower to take corrective actions as indicated above.

Justification

UGI's Distribution Overhead Line Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (5). No waiver is being requested

UGI Utilities, Inc.
 2019 – 2020 Inspection and Maintenance Plan

Section 57.198 (n) (6). Distribution Transformer Inspections. Overhead distribution transformers shall be visually inspected as part of the distribution line inspection every 1-2 years. Above ground padmount transformers shall be inspected at least as often as every 5 years and below ground transformers shall be inspected at least as often as every 8 years. An inspection must include checking for:

- (i) Rust, dents or other evidence of contact
- (ii) Leaking oil
- (iii) Installations of fences or shrubbery that could adversely affect access to and operation of the transformer
- (iv) Unauthorized excavation or changes in grade near the transformer

Program Description

UGI will inspect all of its overhead distribution transformers on a two-year cycle as part of the overhead distribution line inspection program.

UGI will inspect all of its padmount and below ground transformers on a five-year cycle. The purpose of the inspection is to verify that all transformers are in a safe, operational, and reliable condition. The inspection will be performed by a qualified company representative. The inspector will look for rust, dents and other evidence of contact, leaking oil, installations of fences and shrubbery that could adversely affect access to and operation of the transformer, unauthorized excavations or changes in grade near the transformer, and any other conditions which may affect the safety, access to or operation of the transformer.

Inspection information will be documented. Conditions that require follow up will be forwarded to the engineering department for corrective action. Safety related issues will be corrected immediately. Other reported problems will be handled based on the severity of the situation.

UGI maintains adequate inventory and manpower to take corrective action as indicated above.

Further details can be found in UGI' T&D Utilities Engineering Instruction Manual, Section 02-08.

Distribution Transformer Inspection Plan

UGI Utilities, Inc. 11208 Overhead Type 2 Year Cycle	Transformer Inspections Planned		
	Feeder	(number)	
		2019	2020
Courtdale 8000	0	422	

UGI Utilities, Inc.
 2019 – 2020 Inspection and Maintenance Plan

	Courtdale 8002	0	125
	Courtdale 8003	0	85
	Dallas 1930	0	160
	Dallas 1954	0	52
	Dallas 350	0	54
	Glenview 370	0	72
	Glenview 372	0	218
	Glenview 8004	0	500
	Hanover 0070	144	0
	Hanover 0075	9	0
	Hanover 8005	62	0
	Hanover 8006	2	0
	Hanover 8007	0	0
	Hanover 8010	1	0
	Hunlock 419	165	0
	Hunlock 420	1270	0
	Hunlock 421	466	0
	Huntsville 240	0	264
	Huntsville 242	0	509
	Huntsville 244	0	696
	Huntsville 757	0	19
	Kingston 315	0	159
	Kingston 1215	0	72
	Kingston 2530	0	155
	Kingston 2555	0	26
	Koonsville 7536	271	0
	Koonsville 7540	1645	0
	Kunkle 500	0	289
	Kunkle 510	0	345
	Kunkle 520	0	553
	Lincoln Street 602	152	0
	Lincoln Street 603	92	0
	Lincoln Street 604	195	0
	Lincoln Street 606	159	0
	Plymouth 10	91	0
	Plymouth 23	130	0
	Plymouth 45	193	0
	Plymouth 67	65	0

UGI Utilities, Inc.
2019 – 2020 Inspection and Maintenance Plan

	Plymouth 80	412	0
	Swoyersville 116	0	205
	Swoyersville 147	0	250
	Swoyersville 216	0	82
	Swoyersville 237	0	68
	Swoyersville 247	0	217
	Swoyersville 347	0	87

	Feeder	Transformer Inspections Plan (number)	
		2019	2020
UGI Utilities, Inc. <i>269 Padmount & Below Ground Type 5 Year Cycle</i>	Courtdale 8000	10	6
	Courtdale 8002	0	0
	Courtdale 8003	0	0
	Dallas 350	0	1
	Dallas 1930	12	2
	Dallas 1954	2	6
	Glenview 370	0	0
	Glenview 372	14	0
	Glenview 8004	46	0
	Hunlock 419	5	0
	Hunlock 420	1	12
	Hunlock 421	0	4
	Huntsville 240	22	21
	Huntsville 242	0	10
	Huntsville 244	0	0
	Kingston 315	0	5
	Kingston 1215	0	0
	Kingston 2530	0	4
	Kingston 2555	0	0
	Koonsville 7536	0	0
	Koonsville 7540	5	0
	Kunkle 500	0	0
	Kunkle 510	0	0
	Kunkle 520	0	0
	Lincoln 602	12	16
	Lincoln 603	0	0
	Lincoln 604	16	1
	Lincoln 606	7	0
	Plymouth 10	0	0
	Plymouth 23	0	0

UGI Utilities, Inc.
 2019 – 2020 Inspection and Maintenance Plan

	Plymouth 45	0	0
	Plymouth 67	0	4
	Plymouth 80	15	2
	Swoyersville 116	0	7
	Swoyersville 147	0	0
	Swoyersville 216	0	0
	Swoyersville 237	0	0
	Swoyersville 247	0	1
	Swoyersville 347	0	0
	Hanover 70	0	0
	Hanover 75	0	0
	Hanover 8005	0	0
	Hanover 8006	0	0
	Hanover 8007	0	0

Justification

UGI's Distribution Transformer Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (6). No waiver is being requested.

UGI Utilities, Inc.

2019 – 2020 Inspection and Maintenance Plan

Section 57.198 (n) (7). Recloser Inspections. Three phase reclosers shall be inspected on a cycle of 8 years or less. Single phase reclosers shall be inspected as part of the EDC's distribution overhead line inspection plan.

Program Description

UGI will inspect all of its three phase reclosers on a one year cycle or less. UGI will inspect all of its single phase reclosers on a two-year cycle as part of the distribution overhead line inspection program.

The purpose of performing the inspections is to ensure continued safe and reliable operation of the reclosers. The inspections will be conducted by a qualified company representative. The inspection will check for physical damage, oil leaks, and any other conditions that could adversely affect the safe and reliable operation of the recloser.

Inspection information will be documented. Conditions that require follow up will be forwarded to the engineering department for corrective action. Safety related issues will be corrected immediately. Other reported problems will be handled based on the severity of the situation.

Further details can be found in UGI's T&D Engineering Instruction Manual, Section 02-06.

Recloser Inspection Plan

	Type	Recloser Inspection Plan (number)	
		2019	2020
UGI Utilities, Inc. <i>80 Three Phase</i> <i>171 Single Phase</i>	Three Phase 1 Yr Cycle	80	80
	Single Phase 2 Yr Cycle	85	86

Justification

UGI's Recloser Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (7). No waiver is being requested.

UGI Utilities, Inc.

2019 – 2020 Inspection and Maintenance Plan

Section 57.198 (n) (8). Substation Inspections. Substation equipment, structures, and hardware shall be inspected on a cycle of 5 weeks or less.

Program Description

UGI will inspect all of its distribution substations on a cycle of 5 weeks or less. The inspections will be conducted by a qualified company representative. The inspector will walk through each substation noting any physical damage, unsafe conditions, or potential problems with substation equipment, structures, and hardware. Substation fence integrity will be verified along with the posting of danger and no trespassing signs. A description of UGI's Substation Inspection Program can be found in UGI's T&D Engineering Instruction Manual, Sections 4-2-1 & 4-2-2.

The purpose of substation inspections is to ensure continued safe and reliable operation of the substations.

Inspection information will be documented. Conditions that require follow-up will be forwarded to the engineering department for corrective action. Safety related issues will be corrected immediately. Other reported problems will be handled based on the severity of the situation.

Substation Inspection Plan

	Substation	Substation Inspections Plan (number)	
		2017	2018
UGI Utilities, Inc. <i>Total Substations 13</i>	Courtdale 66/13	12	12
	Dallas 66/13	12	12
	Glenview 66/13	12	12
	Hanover 66/13	12	12
	Hunlock 66/13	12	12
	Huntington Mills 13/8	12	12
	Huntsville 66/13	12	12
	Kingston 66/13	12	12
	Koonsville 66/13	12	12
	Kunkle 66/13	12	12
	Lincoln 66/13	12	12
	Plymouth/Lance 66/13	12	12
	Swoyersville 66/13	12	12

UGI Utilities, Inc.
2019 – 2020 Inspection and Maintenance Plan

Justification

UGI's Substation Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (8). No waiver is being requested.

Section 57.198

ORIGIN ID: KPDA (610) 992-3209
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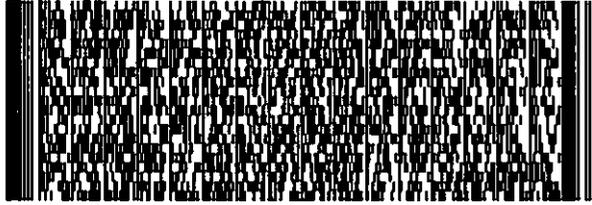
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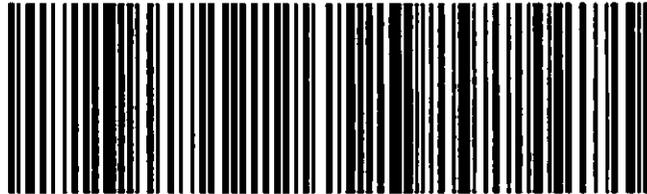
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