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July 8, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

*Re: Petition of PECO Energy Company for a Finding of Necessity Pursuant to 53 P.S. § 10619 that the Situation of Two Buildings Associated with a Gas Reliability Station in Marple Township, Delaware County Is Reasonably Necessary for the Convenience and Welfare of the Public
Docket No. P-2021-3024328*

Dear Secretary, Chiavetta:

Enclosed please find PECO Energy Company's Opposition to Ted Uhlman's Objections to Protected Information. Copies have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter.

Respectfully,

/s/ Christopher A. Lewis

Christopher A. Lewis

Enclosures

cc: Certificate of Service List (w/ enclosure)

**BEFORE THE
COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for a	:	Docket No. P-2021-3024328
Finding of Necessity Pursuant to 53 P.S.	:	
§ 10619 that the Situation of Two Buildings	:	
Associated with a Gas Reliability Station in	:	
Marple Township, Delaware County Is	:	
Reasonably Necessary for the Convenience	:	
and Welfare of the Public	:	

**PECO ENERGY COMPANY’S OPPOSITION TO TED UHLMAN’S
OBJECTION TO PROTECTED INFORMATION**

PECO Energy Company (“PECO” or the “Company”) hereby files this Opposition to Ted Uhlman’s Objection to PECO’s Protected Information, and respectfully requests that the Honorable Administrative Law Judge Emily DeVoe deny Mr. Uhlman’s objections to PECO’s confidentiality designations and proposed revised protective order.

I. FACTUAL BACKGROUND

1. On February 26, 2021, PECO filed a petition seeking a finding from the Commission that: (1) the situation of two buildings for a proposed Gas Reliability Station is reasonably necessary for the convenience and welfare of the public and, therefore exempt from any zoning, subdivision, and land development restriction of the Marple Township Subdivision and Land Development Ordinance and the Marple Township Zoning Code; and (2) a proposed security fence appurtenant to the Gas Reliability Station is a “facility” under 66 Pa. C.S. § 102 and is therefore exempt from local zoning requirements.

2. On May 7, 2021, PECO filed a Motion for Protective Order with the Commission requesting that ALJ DeVoe enter a protective order in the above-captioned matter.

3. On May 20, 2021, ALJ DeVoe entered an Interim Order directing PECO to submit an Amended Motion for Protective Order that, among other things, identified the trade secrets or confidential or proprietary information for which PECO was requesting protection.

4. On May 27, 2021, PECO filed its Amended Motion for Protective Order.

5. On June 9, 2021 ALJ DeVoe issued the Protective Order (attached hereto as **Exhibit A**).

6. Paragraph 3 of the Protective Order permits the parties to designate the following categories of materials as “Confidential” or “Proprietary”:

(a) those materials that customarily are treated by that party as sensitive or proprietary, which are not available to the public, and which, if disclosed freely, would subject that party or its clients to risk of competitive disadvantage or other business injury; and (b) those materials that are of such a commercially sensitive nature among the parties or of such a private, personal nature that the producing party is able to justify a heightened level of Confidential protection with respect to those materials. For purposes of example and not limitation, Proprietary Information includes trade secrets, unpatented inventions, technical development and engineering data, and sensitive information whose public disclosure could increase the security threat to critical infrastructure. In addition, information subject to protection under the Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6) and PUC Regulations at 52 Pa. Code §§ I 02.1-102.4 will be designated as Proprietary Information.

7. Appendix A to the Protective Order allows PECO to make available confidential information to the Active Parties, Julia Baker and Ted Uhlman, once signed and delivered to counsel.

8. On June 11, 2021, Intervenor Ted Uhlman signed Appendix A to the Protective Order.

9. On June 15, 2021, Ted Uhlman delivered a copy of the signed Appendix A to the undersigned counsel.

10. On June 17, 2021, PECO provided Mr. Uhlman with access to documents designated by PECO as “Confidential” pursuant to the Protective Order.

11. As part of the discovery process, PECO produced documents with appropriate confidentiality designations, in accordance with the Protective Order, to all of the Intervenors. The confidential security and proprietary information produced by PECO to the Intervenors includes documents identifying the location and design of PECO’s sensitive energy infrastructure including gas pipelines, gas stations, and the proposed Natural Gas Reliability Station; environmental and sound surveys; and emergency response plans. As explained below, information pertaining to the location of sensitive infrastructure and emergency response plans, in addition to being proprietary, also trigger security concerns which the Commission is obligated to protect under the Public Utility Confidential Security Information Disclosure Protection Act (“CSIDA”).

12. On June 22, 2021 Intervenor Ted Uhlman filed and Objection to PECO’s Protected Information, challenging the confidentiality designations of documents relating to alternate locations, emergency response plans, sound surveys, groundwater studies, purchase and sale agreements, production data, stormwater management plans, soil reports, brochures for tanks, meters and pumps, safety data sheet for diesel fuel, and a catalogue of parts.

II. ARGUMENT

A. THE DOCUMENTS AT ISSUE SEEK TO PROTECT CONFIDENTIAL SECURITY INFORMATION, TRADE SECRETS AND PROPRIETARY INFORMATION.

13. ALJ DeVoe has already issued a protective order in this matter, so PECO need only demonstrate that the documents in dispute fall within the definition of “Confidential” or “Proprietary” as defined in Paragraph 3 of in the Protective Order.

14. As an initial matter, PECO notes that several documents cited in Mr. Uhlman’s Objections are specification and data sheets that were initially marked as confidential given the

detailed engineering, design, and operation data located therein. After further review, these documents appear to be available to other members of the public, and therefore PECO is willing to remove the confidential designation as to those documents only. These documents include:

a. PECO02800-2804: This is a specification and data sheet for steel transfer tanks, a component of the Natural Gas Reliability Station.

b. PECO02805-2810: This is a specification and data sheet for meters and pumps, a component part of the Natural Gas Reliability Station.

c. PECO02811-2822: This is Safety Data Sheet for diesel fuel.

d. PECO03127-3165: These documents are specification and data sheets for individual component parts of the Natural Gas Reliability Station.

15. A general description of each of the remaining disputed documents, as well as a description as to why they are appropriately marked confidential, is included below.¹

e. PECO00442-00472: This document is a PowerPoint that contains information about alternate locations for the Gas Reliability Station. The information contained in the presentation include PECO's internal processes and considerations for selecting the siting of its gas reliability stations. Disclosure of this information would cause unfair economic or competitive advantage if the public had information concerning site selection because PECO would be substantially disadvantaged in its negotiations with potential sellers. Therefore, the document is a trade secret under Pennsylvania Uniform Trade Secrets Act and Confidential and Proprietary as defined in Paragraph 3 of the Protective Order.

¹ Mr. Uhlman provides only vague descriptions of the documents he is challenging, and then makes bald assertions that the documents "[do] not meet the criteria spelled out in the protective order, and therefore should not be covered by the protective order," without providing any further argument or rationale. (Obj. ¶ 5.)

f. PECO00473-520: These are PECO's internal administrative and technical procedures for responding to incidents at its facilities, including documents titled "Gas Emergency Response," "Response to Gas Odor Calls at PECO Gate Stations," "Gas Station Inspection and Maintenance Schedule," "Response to Relief Valve Alarms at the West Conshohocken Gate Stations," and "Initial Field Response and Investigation of Odor." These documents were labeled "Confidential and Proprietary" with an Exelon Corporation copyright before the litigation even began. These documents contain PECO's confidential and proprietary information regarding its operating procedures and emergency response. Therefore, they are trade secrets under the Pennsylvania Uniform Trade Secrets Act and Confidential and Proprietary as defined in Paragraph 3 of the Protective Order. Furthermore, under the CSIDA, the Gas Emergency Response is confidential security information. 35 Pa. Stat. Ann. § 2141.2(2).

g. PECO00521-548: This document is an internal version of an Ambient Sound Survey and Noise Impact Assessment conducted by PECO. It contains PECO's internal engineering data, analysis, and calculations developed by PECO's contractors. PECO has expended considerable time, effort, and money in completing this study. The information contained therein has economic value and is not readily available to the public. Therefore, they are trade secrets under the Pennsylvania Uniform Trade Secrets Act and Confidential and Proprietary as defined in Paragraph 3 of the Protective Order.

h. PECO00572-684: These documents are a Phase I Environmental Site Assessment and a Phase II Environmental Investigation Report. These documents contain PECO's internal engineering data, analysis, and calculations developed by PECO's contractors. PECO has expended considerable time, effort, and money in completing these studies. The information contained therein has economic value and is not readily available to the public. Therefore, they are

trade secrets under the Pennsylvania Uniform Trade Secrets Act and Confidential and Proprietary as defined in Paragraph 3 of the Protective Order.

i. PECO00695-761: These documents are PECO's purchase and sale agreements ("PSA") and amendments related to the property at issue in this proceeding. They contain a nondisclosure provision restricting PECO's dissemination of its terms which protects both PECO and the seller. The PSA was only disclosed with the consent of the seller, subject to reasonable redactions and with the understanding that it would only be produced subject to the confidentiality protections of the Protective Order. Moreover, the agreements are trade secrets, and their disclosure would cause unfair economic or competitive advantage if the public had information related to PECO's purchase and sale agreements. Therefore, they are Confidential and Proprietary as defined in Paragraph 3 of the Protective Order.

j. PECO02441-2499: These documents are spreadsheets containing detailed calculations and data related PECO's annual sales forecast (2020-2029), PECO's forecasted sales volumes, and other data supporting PECO's design day requirements. The documents contain PECO's internal data, analysis, and calculations. Therefore, they are trade secrets under the Pennsylvania Uniform Trade Secrets Act and Confidential and Proprietary as defined in Paragraph 3 of the Protective Order.

k. PECO02500-2506: This is PECO's Response to Emergency Generator Alarm at Gate Stations. It contains proprietary information that is not readily available to the public. Therefore, they are trade secrets under the Pennsylvania Uniform Trade Secrets Act and Confidential and Proprietary as defined in Paragraph 3 of the Protective Order.

l. PECO02507-2731: This document is PECO's Stormwater Management Plan and related Soil Reports. They include PECO's internal engineering data, analysis, and

calculations developed by PECO's contractors. PECO expended considerable time, effort, and money developing the Stormwater Management Plan and Soil Reports. The information contained therein has economic value and is not readily obtainable. Therefore, they are trade secrets under the Pennsylvania Uniform Trade Secrets Act and Confidential and Proprietary as defined in Paragraph 3 of the Protective Order.

16. PECO notes that Mr. Uhlman has not advanced any argument as to why disclosure of PECO's internal proprietary information would be beneficial to the public. To the contrary, public disclosure of that information harms PECO and potentially threatens the security of this region's natural gas distribution system.

WHEREFORE, for all the reasons set forth above, PECO respectfully requests that Your Honor deny Mr. Uhlman's Objections to PECO's Protected Information.

/s/ Christopher A. Lewis _____

Christopher A. Lewis, Esquire

Frank L. Tamulonis, Esquire

Stephen C. Zumbrun, Esquire

BLANK ROME LLP

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Counsel for PECO Energy Company

Dated: July 8, 2021

**BEFORE THE
COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for a
Finding of Necessity Pursuant to 53 P.S.
§ 10619 that the Situation of Two Buildings
Associated with a Gas Reliability Station in
Marple Township, Delaware County Is
Reasonably Necessary for the Convenience
and Welfare of the Public

⋮ Docket No. P-2021-3024328
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PROPOSED ORDER

Upon careful consideration of Ted Uhlman’s Objections to PECO’s Protected Information and PECO’s opposition thereto, including PECO’s agreement to remove any confidentiality designations to PECO02800-04, PECO02805-10, PECO02811-22, and PECO03127-65, IT IS HEREBY ORDERED that the remainder of Mr. Uhlman’s Objections are DENIED.

Dated: _____

Emily I. DeVoe
Administrative Law Judge

CERTIFICATE OF SERVICE

I hereby certify that on this day I served a true copy of the foregoing Opposition to Ted Uhlman's Objections to PECO's Protected Information upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) via electronic mail.

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Dated: July 8, 2021

/s/ Frank L. Tamulonis

EXHIBIT A

Via electronic service only due to Emergency Order at M-2020-3019262

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for a Finding : P-2021-3024328
Of Necessity Pursuant to 53 P.S. § 10619 that the :
Situation of Two Buildings Associated with a Gas :
Reliability Station in Marple Township, Delaware :
County Is Reasonably Necessary for the :
Convenience and Welfare of the Public :

PROTECTIVE ORDER

WHEREAS, the entry of a PROTECTIVE ORDER is necessary and appropriate to govern the discovery of Proprietary Information in this matter, IT IS HEREBY ORDERED that each of the signing parties and their counsel shall be bound by the following terms and conditions concerning Proprietary Information in the above-captioned action:

1. This Protective Order is hereby GRANTED with respect to all materials and information identified at Ordering Paragraphs 2 and 3 herein which are filed with the Pennsylvania Public Utility Commission (the "Commission"), produced in discovery, or otherwise presented during these proceedings. All persons now and hereafter granted access to the materials and information identified in Ordering Paragraphs 2 and 3 shall use and disclose such information only in accordance with this Order.

2. The information subject to this Protective Order is all correspondence, documents, data, information, studies, methodologies and other materials, furnished in these proceedings, which are believed by the producing party to be of a proprietary or Confidential nature and which are so designated by being marked "Confidential" or "Proprietary." Such materials will be referred to herein as "Proprietary Information." When a statement or exhibit is identified for the record, the portions thereof that constitute Proprietary Information shall be designated as such for the record. Any Proprietary

Information inadvertently produced without being marked “Confidential” or “Proprietary” may be so designated by a producing party by written notice to the receiving party within a reasonable time following the discovery that the Proprietary Information was produced without such designation.

3. This Protective Order applies to the following categories of materials: the parties may designate as “Confidential” or “Proprietary” (a) those materials that customarily are treated by that party as sensitive or proprietary, which are not available to the public, and which, if disclosed freely, would subject that party or its clients to risk of competitive disadvantage or other business injury; and (b) those materials that are of such a commercially sensitive nature among the parties or of such a private, personal nature that the producing party is able to justify a heightened level of Confidential protection with respect to those materials. For purposes of example and not limitation, Proprietary Information includes trade secrets, unpatented inventions, technical development and engineering data, and sensitive information whose public disclosure could increase the security threat to critical infrastructure. In addition, information subject to protection under the Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6) and PUC Regulations at 52 Pa.Code §§ 102.1-102.4 will be designated as Proprietary Information.

4. Proprietary Information shall be made available to counsel for a party, subject to the terms of this Protective Order. For so long as they are Active Parties in this proceeding, Proprietary Information shall also be made available to Protestants Julia Baker and Theodore Uhlman, provided that prior to any such disclosure such person has signed and delivered to all counsel a letter in the form attached hereto as Appendix A. All persons receiving Proprietary Information shall use or disclose the Proprietary Information only for purposes of preparing or presenting evidence, cross examination, argument, or settlement in these proceedings. The designation of material as Proprietary Information shall not itself affect the rights of the designator (or the designator’s authorized representative) to give or disclose the Proprietary Information to any person for any reason, and such giving or disclosing of Proprietary Information shall not be deemed a

waiver of this Agreement, unless such information is made publicly available by designator.

5. To the extent required for participation in this proceeding, a party's counsel may afford access to Proprietary Information made available by another party ("the Producing Party") to:

- i. The Commission at any hearing in this proceeding or in connection with motions filed in this proceeding;
- ii. Counsel of record for all named parties to this action and their immediate supervisor;
- iii. Other counsel not of record, not to exceed five (5) individuals, provided only that said individuals are duly employed on a full-time basis with the organizations that are named parties to this action.
- iv. The Commissioners of Marple Township, The Township Manager of Marple Township, the Township Engineer of Marple Township, the Commissioners of Delaware County, the Executive Director of Delaware County, the Fire Marshal, and the Chief of the Fire Department, provided that prior to any such disclosure such person has signed and delivered to all counsel a letter in the form attached hereto as Appendix A. It shall be the further obligation of counsel, upon learning of any breach or threatened breach of this Protective Order by any person to whom such counsel has delivered Confidential Information, promptly to notify opposing counsel of such breach or threatened breach;
- v. Court reporters;
- vi. Any witness during the course of that witness's deposition or examination;
- vii. Experts consulted by the named parties or their counsel in connection with this action, whether or not retained to testify at trial, provided that prior to any such disclosure counsel for the party making the disclosure shall deliver a copy of this Protective Order to the expert, shall explain its terms to the expert, shall secure the signature of the expert on a letter in the form attached hereto as Appendix A and shall deliver such letter to all counsel of record. It shall be the further obligation of counsel, upon learning of any breach or threatened breach of this Protective Order by any expert and/or advisor, promptly to notify opposing counsel of such breach or threatened breach.

6. To the extent required for participation in this proceeding, Ms. Baker and Mr. Uhlman may afford access to Proprietary Information made available by a Producing Party to:

- i. The Commission at any hearing in this proceeding or in connection with motions filed in this proceeding;
- ii. Court reporters;
- iii. Any witness during the course of that witness's deposition or examination;
- iv. Experts in connection with this action, whether or not retained to testify at trial, provided that at least fifteen (15) days prior to any such disclosure, Ms. Baker and Mr. Uhlman has delivered to all counsel of record a letter disclosing the identity of such expert, has delivered a copy of this Protective Order to the expert, has explained its terms to the expert, and has secured the signature of the expert on a letter in the form attached hereto as Appendix A and delivered such letter to all counsel of record. It shall be the further obligation of Ms. Baker and Mr. Uhlman, upon learning of any breach or threatened breach of this Protective Order by any expert, promptly to notify opposing counsel of such breach or threatened breach.

7. In accordance with the provisions of Sections 5.362 and 5.365(e) of the Commission's Rules of Practice and Procedure, 52 Pa.Code §§ 5.362, 5.365(e), any party may, by subsequent objection or motion, seek further protection with respect to Proprietary Information including, but not limited to, total prohibition of disclosure or limitation of disclosure only to particular persons or parties.

8. A Producing Party shall designate data or documents as constituting or containing Proprietary Information by affixing an appropriate Confidential stamp or typewritten or handwritten designation on such data or documents. Where only part of data compilations or multi-page documents constitutes or contains Proprietary Information, the Producing Party, insofar as reasonably practicable within discovery and other time constraints imposed in this proceeding, shall designate only the specific data or pages of documents that constitute or contain Proprietary Information.

9. Any public reference to Proprietary Information by the Commission or by counsel or persons afforded access thereto shall be to the title or exhibit reference in sufficient detail to permit persons with access to the Proprietary Information to fully understand the reference and not more. The Proprietary Information shall remain a part of the record, to the extent admitted, for all purposes of administrative or judicial review.

10. Part of any record of any proceedings containing the Proprietary Information, including but not limited to all exhibits, writings, testimony, cross examination, argument, and responses to discovery, and including reference thereto as mentioned in Ordering Paragraph No. 9, above, shall be sealed for all purposes, including administrative and judicial review, unless such Proprietary Information is released from the restrictions of this Protective Order, either through the agreement of the parties or pursuant to an order of an Administrative Law Judge or the Commission. Unresolved challenges arising under Ordering Paragraph No. 11, below, shall be decided on motion or petition by the presiding officer and/or the Commission as provided in 52 Pa.Code § 5.365(a). All such challenges will be resolved in conformity with existing rules, regulations, orders, statutes, and precedent to the extent such guidance is available.

11. The parties affected by the terms of this Protective Order shall retain the right to question or challenge the Confidential or proprietary nature of Proprietary Information; to question or challenge the admissibility of Proprietary Information on any proper ground, including but not limited to irrelevance, immateriality or undue burden; to seek an order permitting disclosure of Proprietary Information beyond that allowed in this Protective Order; and to seek additional measures of protection of Proprietary Information beyond those provided in this Protective Order. If a challenge is made to the designation of a document or information as Proprietary, the party claiming that the information is Proprietary retains the burden of demonstrating that the designation is necessary and appropriate.

12. Upon completion of this proceeding, including any administrative or judicial review thereof, all copies of all documents and other materials, that contain any

APPENDIX A

COMMONWEALTH OF PENNSYLVANIA
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company for a : Docket No. P-2021-3024328
Finding of Necessity Pursuant to 53 P.S. :
§ 10619 that the Situation of Two Buildings :
Associated with a Gas Reliability Station in :
Marple Township, Delaware County Is :
Reasonably Necessary for the Convenience :
and Welfare of the Public :
:

The undersigned has read and understands the Protective Order issued in the above-captioned proceeding, which deals with the treatment of Proprietary Information. The undersigned agrees to be bound by, and comply with, the terms and conditions of said Protective Order. In the case of an independent expert, the undersigned represents that he/she has complied with the terms of the Protective Order prior to submitting this Affidavit. The undersigned agrees that any Proprietary Information, as addressed and defined in the Protective Order, shall be used and disclosed only for purposes of preparation for, and the conduct of, the above-captioned proceeding, and any administrative or judicial review thereof, and shall not be disclosed or used for any other purposes whatsoever. The undersigned agrees that, if he or she is an Active Party and Protestant in this matter, he or she will return all Proprietary Information. All other signatories shall either return or destroy all Proprietary Information.

The undersigned understands and agrees that money damages may not be a sufficient remedy for any breach of the Protective Order and the undersigned hereby agrees that the non-breaching party will be entitled to obtain in any court of competent jurisdiction a decree of specific performance or other injunctive relief as a remedy for any such breach in favor of the non-breaching party, without the necessity of posting a bond or other security. Such remedy shall not be deemed to be the exclusive remedy for any such breach but shall be in addition to all other remedies available at law or equity to the non-breaching party. The prevailing party shall be entitled to recover from the non-prevailing party its reasonable attorneys' fees and expenses incurred in enforcing the Protective Order.

The undersigned further agrees to be bound by the terms of the Protective Order and to subject himself/herself to the jurisdiction of the administrative and judicial bodies of the Commonwealth of Pennsylvania for the enforcement of the Protective Order and understands that, in the event that he/she fails to abide by the provisions of this Order, he/she may be subject to sanctions by the administrative and judicial courts of this Commonwealth.

Signature

Print Name

Job Title and Description

Business Address

Employer

If Independent Expert, List Persons/Entities Retaining You

Role in Proceeding

Date

P-2021-3024328 - PETITION OF PECO ENERGY COMPANY FOR A FINDING OF NECESSITY PURSUANT TO 53 P.S. § 10619 THAT THE SITUATION OF TWO BUILDINGS ASSOCIATED WITH A GAS RELIABILITY STATION IN MARPLE TOWNSHIP, DELAWARE COUNTY IS REASONABLY NECESSARY FOR THE CONVENIENCE AND WELFARE OF THE PUBLIC.

FULL-SERVICE LIST:

Revised 4/29/21

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P-2021-3024328 - PETITION OF PECO ENERGY COMPANY FOR A FINDING OF NECESSITY PURSUANT TO 53 P.S. § 10619 THAT THE SITUATION OF TWO BUILDINGS ASSOCIATED WITH A GAS RELIABILITY STATION IN MARPLE TOWNSHIP, DELAWARE COUNTY IS REASONABLY NECESSARY FOR THE CONVENIENCE AND WELFARE OF THE PUBLIC

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Revised 4/29/21

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