



Wisconsin Public Service Corporation
700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

December 7, 2012

Ms. Kimberly D. Bose, Secretary
The Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Dear Secretary Bose:

Peshtigo River Hydroelectric Projects – CLWMP Invasive Species Monitoring Plan

As per the Federal Energy Regulatory Commission (FERC) Order Approving the Updated Comprehensive Land and Wildlife Management Plan (CLWMP) - Invasive Species Monitoring Plan for the Peshtigo Hydroelectric Project (FERC Project No. 2581) and Potato Rapids Hydroelectric Project (FERC Project No. 2560) issued on June 12, 2012, Wisconsin Public Service Corporation (WPS) is to provide monitoring reports to the Wisconsin Department of Natural Resources (WDNR) and U.S. Fish & Wildlife Service (FWS) by September 30th, and to the Federal Energy Regulatory Commission (FERC) by December 31st, each year a survey has been completed.

2012 Peshtigo Hydroelectric Project – Purple Loosestrife Plan

As per the FERC order approving the updated CLWMP dated June 12, 2012, WPS is submitting an update on the biological control and monitoring efforts for the Peshtigo Hydroelectric Project. The 2012 survey year is the fourth of the five year biological control project.

On July 11, 2012, WPS completed a purple loosestrife survey at the Peshtigo Hydroelectric Project. In addition, WPS released approximately 10,000 *gallerucella* beetles at the three largest purple loosestrife infested areas. The survey results indicated that the purple loosestrife colonies have been reduced by one colony; from 14 colonies in 2011 to 13 colonies in 2012. This number does not include the 3 small colonies, which were hand pulled, leaving a total of 10 colonies remaining in 2012. No new purple loosestrife colonies were observed in 2012.

As in 2011, feeding was observed at every remaining purple loosestrife colony in 2012. Plant vigor was observed at an average of 7.6, which was the same as observed in 2011 and a significant decrease from the 2010 average of 10.6.

With the release of 10,000 *gallerucella* beetles at three additional sites in 2012, WPS is anticipating to observe a significant decrease in the overall purple loosestrife population in 2013. The purple loosestrife colonies including the release site location figure and purple loosestrife survey form is included in Appendix A.

2012 Potato Hydroelectric Project – Purple Loosestrife Plan

As per the FERC order approving the updated CLWMP dated June 12, 2012, WPS is submitting the 2012 purple loosestrife survey results for the Potato Rapids Hydroelectric Project.

Ms. Kimberly D. Bose, Secretary

December 7, 2012

Page 2 of 2

WPS observed purple loosestrife at the Potato Rapids Hydroelectric Project for the first time in 2011. The colony consisted of one plant and was hand pulled. In 2012, the Marinette County Conservation District completed purple loosestrife survey activities on the Potato Rapids Hydroelectric Project, which included a review of the site observed in 2011. The surveys were completed on July 6, 2012 with a follow up survey completed at the end of August.

No purple loosestrife was observed at the Potato Rapids Hydroelectric Project.

The survey results were provided to the resource agencies on September 21, 2012. The WDNR provided comments on November 12, 2012. The WDNR's comments and WPS's response to those comments is included in Appendix B.

Should you have any questions relative to this material, please do not hesitate to contact Jamie Nuthals, at (920) 433-1460.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Jensky". The signature is stylized and cursive.

Terry P. Jensky

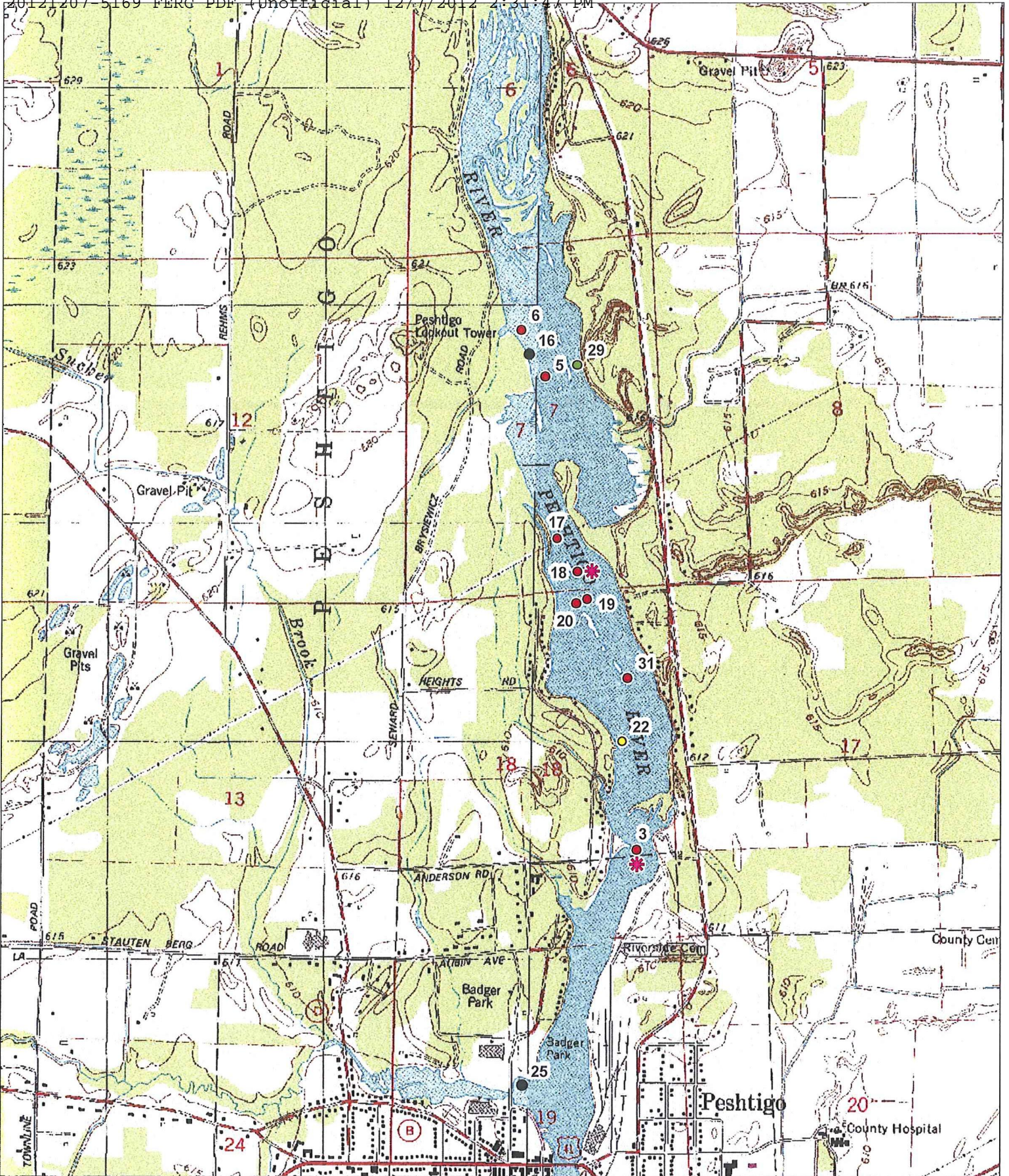
Vice President - Generation Assets

cc: Mr. Ed Brandt, WPS
Mr. William Bosacki, WPS
Ms. Carlisa Linton-Peters, FERC

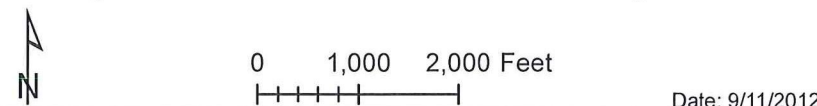
Mr. Gil Snyder, WPS
Ms. Cheryl Laatsch, WDNR

APPENDIX A

PESHTIGO HYDROELECTRIC PROJECT- 2012 PURPLE LOOSESTRIFE UPDATE



Peshtigo River Purple Loosestrife Survey-2012



- Purple Loosestrife**
- PULLED
 - 0-5 Plants
 - 6-50 Plants
 - >50 Plants
 - ✱ Beetle Release Site

Date: 9/11/2012

Purple Loosestrife Survey Form

Hydroelectric Project Peshtigo Hydro Electric Project

Inspection Date 7/11/2012

General Plant Vigor

Colony Number	Colony Size S 0-5 M 6-50 L >50	Plant Height 4=>4ft 3=2-4ft 2=1-2 ft 1= <1 ft	Plant Flowering 4=100% of plants 3=51-99% of plants 2=26-50% of plants 1= <25% of plants	Beetle Feeding 4=0-25% feeding 3=26-50% feeding 2=51-75% feeding 1=76-100% feeding	Total Plant Vigor 10-12=good 7-9=fair 4-6=poor 0-3=very poor	Notes	GPS #
1	NO LONGER ABLE TO IDENTIFY						
2	NO LONGER ABLE TO IDENTIFY						
3	L	4	3	2	10	Release site in 2012	93
4	NO LONGER ABLE TO IDENTIFY						
5	L	2	4	3	9		95
6	L	3	1	2	6		220
7	NO LONGER ABLE TO IDENTIFY						
8	NO LONGER ABLE TO IDENTIFY						
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12	NO LONGER ABLE TO IDENTIFY						
13	NO LONGER ABLE TO IDENTIFY						
14	NO LONGER ABLE TO IDENTIFY						
15	NO LONGER ABLE TO IDENTIFY						
16	S	1	1	1	3	Pulled	106
17	L	3	2	2	7		107
18	M	4	4	3	11	release site in 2012	108
19	L	3	2	1	6	release site in 2012	109
20	L	3	2	1	6		110
21	NO LONGER ABLE TO IDENTIFY						
22	M	2	2	1	5		112

APPENDIX B

DOCUMENTATION OF CONSULTATION



Wisconsin Public Service Corporation
700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

September 21, 2012

Mr. Nicholas Utrup
U.S. Fish & Wildlife Service
Department of the Interior
2661 Scott Tower Drive
New Franken, WI 54229-9565

Dear Mr. Utrup:

Peshtigo River Hydroelectric Projects – CLWMP Invasive Species Monitoring Plan

As per the Federal Energy Regulatory Commission (FERC) Order Approving the Updated Comprehensive Land and Wildlife Management Plan (CLWMP)- Invasive Species Monitoring Plan for the Peshtigo Hydroelectric Project (FERC Project No. 2581) and Potato Rapids Hydroelectric Project (FERC Project No. 2560) issued on June 12, 2012, Wisconsin Public Service Corporation (WPS) is to provide monitoring reports to the Wisconsin Department of Natural Resources (WDNR) and U.S. Fish & Wildlife Service (FWS) by September 30th, each year a survey has been completed.

2012 Peshtigo Hydroelectric Project – Purple Loosestrife Plan

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On July 11, 2012, WPS completed a purple loosestrife survey at the Peshtigo Hydroelectric Project. In addition, WPS released approximately 10,000 *gallerucella* beetles at the three largest purple loosestrife infested areas. The survey results indicated that the purple loosestrife colonies have been reduced by one colony; from 14 colonies in 2011 to 13 colonies in 2012. This number does not include the 3 small colonies, which were hand pulled, leaving a total of 10 colonies remaining in 2012. No new purple loosestrife colonies were observed in 2012.

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2012 Potato Hydroelectric Project – Purple Loosestrife Plan

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Mr. Utrup
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WPS observed purple loosestrife at the Potato Rapids Hydroelectric Project for the first time in 2011. The colony consisted of one plant and was hand pulled. In 2012, the Marinette County Conservation District completed purple loosestrife survey activities on the Potato Rapids Hydroelectric Project, which included a review of the site observed in 2011. The surveys were completed on July 6, 2012 with a follow up survey completed at the end of August.

No purple loosestrife was observed at the Potato Rapids Hydroelectric Project.

Please let me know if you have any questions or concerns with the purple loosestrife survey reports for the Peshtigo and Potato Rapids Hydroelectric Projects.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Nuthals", written in a cursive style.

James Nuthals
Environmental Services-
Natural Resource Management

Enc.



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700 North Adams Street
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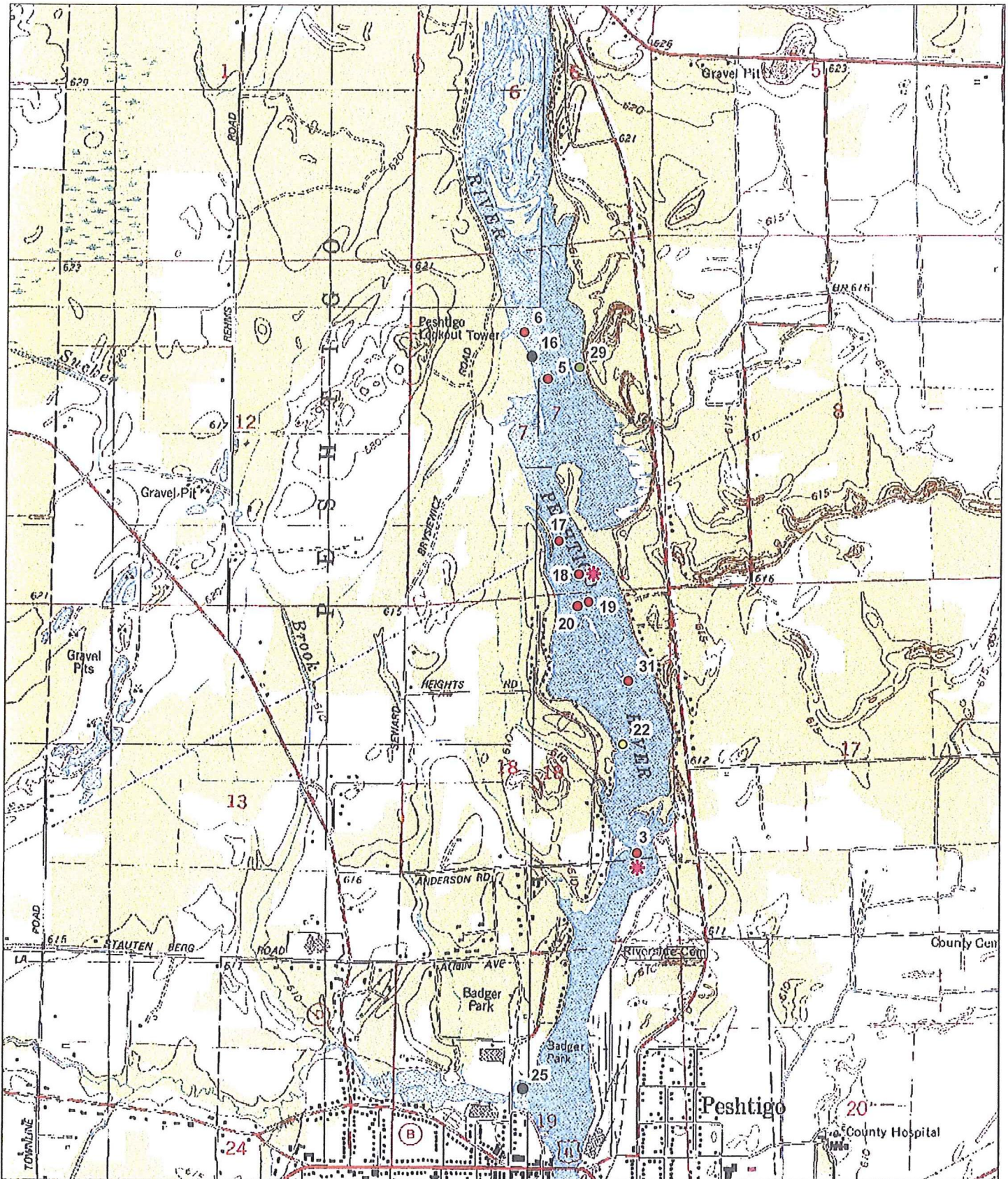
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James Nuthals
Environmental Services-
Natural Resource Management

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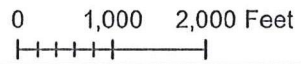
APPENDIX A

PESHTIGO HYDROELECTRIC PROJECT- 2012 PURPLE LOOSESTRIFE UPDATE



Peshtigo River Purple Loosestrife Survey-2012

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- PULLED
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Date: 9/11/2012

Purple Loosestrife Survey Form

Hydroelectric Project Peshtigo Hydro Electric Project

Inspection Date 7/11/2012

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NO LONGER ABLE TO IDENTIFY							
22	M	2	2	1	5		112

WDNR COMMENTS

Nuthals, James D

From: Laatsch, Cheryl - DNR [Cheryl.Laatsch@Wisconsin.gov]
Sent: Monday, November 12, 2012 10:07 AM
To: Nuthals, James D
Subject: RE: 2012 WPS Potato Rapids and Peshtigo Hydroelectric Project Purple Loosestrife Update Report

Follow Up Flag: Follow up
Flag Status: Flagged

Jamie – I am still waiting for comments on these projects. Here is our comments so far... if I get anymore, I will forward them,. Thanks.

1. Wisconsin is a mosaic of waterways representing the Mississippi River and the Great Lakes Regions. With this vast mosaic of waterways and river systems, comes an array of aquatic invasive species. As we move forward with identifying and eradicating AIS, there are basic steps that all hydro owners need to participate in, to help improve the resource. Some AIS can significantly hinder hydro operations that may result in excessive operation and maintenance costs, including lost generation. We encourage the utility to work with the WDNR to develop Best Management Practices for their operations and maintenance of the hydro, to reduce the introduction and spread of AIS. Additionally, the WDNR recommends revisions to the current AIS plan to address the following concerns:
 - a. Identify all existing AIS within the study area and discuss which new AIS are most likely to arrive (i.e. SMART analysis).
 - b. Determine an acceptable survey and mapping methodology
 - c. Identify and implement quality control measures, and equipment calibration measures
 - d. Improve awareness and the dynamics of the study area
 - e. Avoid duplicate workload for agency staff, utilities, and local associations
 - f. Manage and analyze the data collected to define population characteristics, establish trends, and evaluate management success.
 - g. Establish and implement protocols for management/removal of AIS
 - h. Provide a timeline to review the current AIS plans and revise the plans as appropriate for the project area

2. If purple loosestrife (*Lythrum salicaria*) is present, control or eliminate all small populations of loosestrife (usually 50 plants or less), with acceptable manual/chemical/mechanical methods annually, as necessary, and establish viable, on-going, and effective populations of biocontrol beetles (*Galerucella pusilla* and/or *G. calmariensis*) on all larger loosestrife populations.

Cheryl Laatsch, Horicon DNR
N7725 HIGHWAY 28
HORICON WI 53032
(920) 387-7869
(920) 485-3028 (Fax)

Nuthals, James D

From: Laatsch, Cheryl - DNR [Cheryl.Laatsch@Wisconsin.gov]
Sent: Monday, November 12, 2012 12:53 PM
To: Nuthals, James D
Subject: FW: 2012 WPS Potato Rapids and Peshtigo Hydroelectric Project Purple Loosestrife Update Report

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category

Here are final comments,. Thanks

Cheryl Laatsch, Horicon DNR
N7725 HIGHWAY 28
HORICON WI 53032
(920) 387-7869
(920) 485-3028 (Fax)

e-mail: Cheryl.laatsch@wisconsin.gov
Website: dnr.wi.gov
www.facebook.com/WIDNR

From: Hudak, Andrew J - DNR
Sent: Monday, November 12, 2012 10:20 AM
To: Laatsch, Cheryl - DNR
Subject: RE: 2012 WPS Potato Rapids and Peshtigo Hydroelectric Project Purple Loosestrife Update Report

Cheryl-

It appears they are gaining ground in the overall control over the PLS stands. They have seen reduction in the number and health of existing stands. It says this is the 4th year of the 5 year bio-control project. I do not have any directed comments to them at this time regarding the plan in 2012 submittal. I would expect the 2013 summary will provide a greater narrative over the success or short comings of the 5 year bio-control project.

e-mail: Cheryl.laatsch@wisconsin.gov

Website: dnr.wi.gov

www.facebook.com/WIDNR

From: Nuthals, James D [<mailto:JDNuthals@integrysgroup.com>]

Sent: Friday, September 21, 2012 11:07 AM

To: Laatsch, Cheryl - DNR; 'Nick_Utrup@fws.gov'

Subject: 2012 WPS Potato Rapids and Peshtigo Hydroelectric Project Purple Loosestrife Update Report

Greetings,

Please reference the attached 2012 Wisconsin Public Service Corporation Potato Rapids and Peshtigo Hydroelectric Project Purple Loosestrife Update Report.

Please let me know if you have any questions or concerns.

Sincerely,

James D Nuthals

Natural Resource Management | Environmental Services | Integrys Business Support, LLC

920-433-1460

920-309-0741 cell (please note cell phone number change)

920-433-1176 fax

jdnuthals@integrysgroup.com

www.integrysgroup.com

Providing support for Integrys Energy Group, Integrys Energy Services, Michigan Gas Utilities, Minnesota Energy Resources, North Shore Gas, Peoples Gas, Upper Peninsula Power Company, Wisconsin Public Service, and Wisconsin River Power.

WPS RESPONSE TO WDNR COMMENTS

Wisconsin Public Service Corporation (WPS) received comments from the Wisconsin Department of Natural Resources (WDNR) after submittal of the 2012 Peshtigo River Hydroelectric Project Invasive Species Monitoring Reports for the Peshtigo Hydroelectric Project (FERC Project # 2581) and Potato Rapids Hydroelectric Project (FERC Project #2560). As an overall comment, WPS is concerned that the WDNR comments are beyond the scope of License Article 408 for the Peshtigo Hydroelectric Project, License Article 409 for the Potato Rapids Hydroelectric Project and the Federal Energy Regulatory Commission (FERC) Order Approving the Updated Comprehensive Land and Wildlife Management Plan (CLWMP) – Invasive Species Monitoring Plan issued on June 12, 2012 for the Peshtigo River Hydroelectric Projects. In all circumstances, the WDNR has already reviewed and commented prior to plan and license article approval by FERC.

The comments are general and are not directly related to the report submitted for review. WDNR has not provided specific data that additional Aquatic Invasive Species (AIS) are present within the project boundary. Additionally, no justification has been provided indicating that monitoring, control, or eradication of additional AIS species is warranted.

The Aquatic Invasive Species License Requirements included in License Article 408 and Article 409 for the Peshtigo and Potato Rapids Hydroelectric Projects read as follows:

Article 408 and Article 409

Within one year of license issuance, the licensee shall file with the Commission for approval, a comprehensive land and wildlife management plan (CLWMP) for all licensee-owned lands within the project boundary.

The CLWMP may be consolidated into a single plan for the Caldron Falls Hydroelectric Project (Project No. 2525), High Falls Hydroelectric Project (Project No. 2595), Johnson Falls Hydroelectric Project (Project No. 2522), Sandstone Rapids Hydroelectric Project (Project No. 2546), Potato Rapids Hydroelectric Project (Project No. 2560) and Peshtigo Hydroelectric Project (Project No. 2581).

The plan shall include, at a minimum:

- (5) a plan to monitor zebra mussels (*Dreissena polymorpha*) in project waters, including, but not limited to: (a) the method of monitoring, (b) the frequency of monitoring, and (c) documentation of transmission of monitoring data to the Wisconsin Department of Natural Resources (Wisconsin DNR), U.S. Fish and Wildlife Service (FWS), and the University of Wisconsin Sea Grant Institute; and if deemed necessary by the Wisconsin DNR and FWS, cooperate with the agencies to control/eliminate zebra mussels;***
- (6) a plan to monitor purple loosestrife (*Lythrum salicaria*) and Eurasian milfoil (*Myriophyllum spicatum*) in project waters, including, but not limited to: (a) the method of monitoring; (b) the frequency of monitoring; and documentation of transmission of monitoring data to the Wisconsin DNR and FWS; and if deemed necessary by the Wisconsin DNR and FWS, cooperate with the agencies to control/eliminate purple loosestrife and Eurasian milfoil;***

The plan shall be prepared after consultation with Wisconsin DNR, FWS and Marinette County Land & Water Conservation Department (Marinette County). The licensee shall include with the plan documentation of consultation, copies of comments and recommendations on the completed plan after it has been prepared and provided to the agencies, and specific descriptions of how the agencies' comments are accommodated by the plan. The licensee shall allow a minimum of 30 days for the agencies to comment and to make recommendations before filing the plan with the Commission. If the licensee does not adopt a recommendation, the filing shall include the licensee's reasons, base on project – specific information.

The Commission reserves the right to require changes to the plan. Upon Commission approval, the licensee shall implement the plan, including any changes required by the Commission.

The licensee shall review and update the CLWMP every 6 years, after consultation with Wisconsin DNR, FWS, and Marinette County. The licensee shall file the updated plan with the Commission for approval.

WDNR SPECIFIC COMMENTS

WDNR COMMENT: Wisconsin is a mosaic of waterways representing the Mississippi River and the Great Lakes Regions. With this vast mosaic of waterways and river systems, comes an array of aquatic invasive species.

WPS RESPONSE: Comment noted.

WDNR COMMENT: As we move forward with identifying and eradicating AIS, there are basic steps that all hydro owners need to participate in, to help improve the resource.

WPS RESPONSE: The Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan already provides for identification and if necessary control of specific AIS. In addition, the eradication of AIS in some circumstances would be impractical if not impossible. WPS will continue to implement the measures outlined in the FERC approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan.

WDNR COMMENT: Some AIS can significantly hinder hydro operations that may result in excessive operation and maintenance costs, including lost generation. We encourage the utility to work with the WDNR to develop Best Management Practices for their operations and maintenance of the hydro, to reduce the introduction and spread of AIS.

WPS RESPONSE: WPS complies with all applicable state and federal laws concerning the introduction and spread of AIS. In addition, the Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan already provides for measures to control the spread of specific AIS, where necessary. WPS will continue to implement the measures outlined in the FERC approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan.

WDNR COMMENT: Additionally, the WDNR recommends revisions to the current AIS plan to address the following concerns:

WPS RESPONSE: WDNR has not provided specific data that additional AIS are present within the project boundary. No justification has been provided by WDNR indicating that monitoring, control, or eradication of additional AIS species is necessary. WPS will continue to implement the measures outlined in the FERC approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan.

WDNR COMMENT: Identify all existing AIS within the study area and discuss which new AIS are most likely to arrive (i.e. SMART analysis).

WPS RESPONSE: WDNR has not provided specific data that additional AIS are present within the project boundary. No justification that monitoring, control, or eradication of additional AIS species is necessary has been provided by WDNR. WPS will continue to implement the measures outlined in the FERC approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan.

WDNR COMMENT: Determine an acceptable survey and mapping methodology.

WPS RESPONSE: In the approved Invasive Species Monitoring Plan, protocols for monitoring methods, frequency of survey, mapping, and implementation of control measures have already been established. WPS will continue to implement the measures outlined in the FERC approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan.

WDNR COMMENT: Identify and implement quality control measures, and equipment calibration measures.

WPS RESPONSE: WPS ensures that all AIS surveying and control equipment is clean and in proper working condition. WPS will continue to implement the measures outlined in the FERC approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan.

WDNR COMMENT: Improve awareness and the dynamics of the study area.

WPS RESPONSE: The Invasive Species Monitoring Plan already requires WPS to display invasive species information at all WPS owned public access areas. WPS will continue to implement the measures outlined in the FERC approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan.

WDNR COMMENT: Avoid duplicate workload for agency staff, utilities, and local associations.

WPS RESPONSE: The annual agency meeting provides an opportunity for the WDNR to express its concerns about duplicate workload for agency staff, utilities and local associations.

WDNR COMMENT: Manage and analyze the data collected to define population characteristics, establish trends, and evaluate management success.

WPS RESPONSE: The Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan already provides for specific AIS data to be provided to the WDNR for their analysis on an annual basis. WPS will

continue to implement the measures outlined in the FERC approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan.

WDNR COMMENT: Establish and implement protocols for management/removal of AIS.

WPS RESPONSE: Under the approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan, protocols for monitoring methods, frequency of survey, mapping, and implementation of control measures have already been established. In addition, WPS would like to point out that some AIS species may fluctuate in population but remain in check with the surrounding aquatic community and may not require management or removal. For instance, WPS has been completing Eurasian Water Milfoil (EWM) surveys at the Grand Rapids Hydroelectric Project (FERC Project # 2433) since 1998. Since 2006, EWM has shown natural fluctuations in populations but has overall remained in check. EWM stands encompassed 15.58 acres in 2006, 47.8 acres in 2007, 81 acres in 2008, 1.6 acres in 2009, 2.0 acres in 2010 and 10.9 acres in 2011. Based on these results, EWM is only one plant of many aquatic plant species located in a healthy aquatic plant community. WPS will continue to implement the measures outlined in the FERC approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan.

WDNR COMMENT: Provide a timeline to review the current AIS plans and revise the plans as appropriate for the project area.

WPS RESPONSE: WDNR has not provided specific data that additional AIS are present within the project boundary. No justification that monitoring, control, or eradication of additional AIS species has been provided by WDNR. WPS will continue to implement the measures outlined in the FERC approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan.

WDNR COMMENT: If purple loosestrife (*Lythrum salicaria*) is present, control or eliminate all small populations of loosestrife (usually 50 plants or less), with acceptable manual/chemical/mechanical methods annually, as necessary and establish viable on-going, and effective populations of biocontrol beetles (*Galerucella pusilla* and/or *G. californiensis*) on all larger loosestrife populations.

WPS RESPONSE: Since 1999, WPS has been very successful in controlling and/or eliminating purple loosestrife colonies at all WPS owned Peshtigo River Hydroelectric Projects: which includes the use of acceptable removal methods and the use of *Galerucella* beetles as already outlined in the Invasive Species Monitoring Plan. WPS will continue to implement the measures outlined in the FERC approved Peshtigo River Hydroelectric Project Invasive Species Monitoring Plan.

WDNR COMMENT: It appears they are gaining ground in the overall control over the PLS stands. They have seen reductions in the number and health of existing stands. It says this is the 4th year of the 5 year bio-control project. I do not have any directed comments to them at this time regarding the plan in 2012 submittal. I would expect the 2013 summary will provide a greater narrative over the success or short comings of the 5 year bio-control project.

WPS RESPONSE: Comment Noted.

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