

OPTIONS EVALUATION REPORT (OER)

Broken Hill Secondary Systems Renewal

OER 000000001193 revision 2.0



Ellipse project no.: P0005256

TRIM file: [TRIM No]

Project reason: Capability - Asset Replacement for end of life condition

Project category: Prescribed - Replacement

Approvals

| | | |
|------------------------------------|------------------|--|
| Author | Anuraag Malla | Jacobs Consultant |
| | Annie Welvaert | Secondary Systems Analyst |
| Endorsed | Philip Wong | Secondary Systems Asset Engineer |
| | Mark Jones | Secondary Systems and Communications Asset Manager |
| | Azil Khan | Investment Strategy Manager |
| Approved | Lance Wee | M/Asset Strategy |
| Date submitted for approval | 24 November 2016 | |

Change history

| Revision | Date | Amendment |
|----------|------------------|---|
| 0 | 28 June 2016 | Initial issue |
| 1 | 31 October 2016 | Update to 2016/17 dollars and SFAIRP/ALARP data |
| 2 | 15 November 2016 | Update to format |
| 3 | 24 November 2016 | Added OSR reference |

1. Need/opportunity

Broken Hill 220/22kV Substation comprises 2x220kV feeders, 2x220kV reactors, 2x220/22kV transformers, 8x22kV feeders, 3x22kV capacitor banks and 2x22kV SVCs. The site was established in 1979, and the secondary systems assets have install dates between 1979 (electro-mechanical type with 40 years average nominal asset life) and 2015 (microprocessor with 15 years average nominal asset life).

The Secondary Systems assets have been identified as reaching end of life and require addressing at the site. Additionally, there is an opportunity to improve the operational capacity of the site by modernising the automation philosophy to current design standards and practices

2. Related Needs/opportunities

The assets proposed to be replaced under this Secondary System Replacement were identified in the following Needs:

- > Need ID 605 – Replacement of Quadramho Protection Relays
- > Need ID 606 – Replacement of THR Protection Relays
- > Need ID 610 – Replacement of EDM1 MK3 Energy Meters
- > Need ID 621 – Replacement of DB Series Protection Relays
- > Need ID 1368 – Replacement of Feeder OC Protection Relays
- > Need ID 1387 – Replacement of Capacitor Protection Relays
- > Need ID 1388 – Replacement of SVC Protection Relays
- > Need ID 1338 – Various Locations CT Renewal Program
- > Need ID 1442 – Various Locations VT Renewal Program
- > Need ID 541 – Magrini Galileo MGE 33kV Circuit Breakers

3. Options

The options scoped for this need were identified as per the Options Screening Report – Secondary System Renewal.

All dollar values in this document are expressed in un-escalated 2016/17 dollars.

Base Case

The Base Case for this Need is to continue with TransGrid's operation and maintenance (O&M) for the site. This approach does not address the technological obsolescence, spares unavailability, manufacturer non-support, component deterioration of the secondary systems and the risk cost associated with the Need. The risk cost associated with all secondary system at Broken Hill Substation of \$5.75m per annum will increase due to:

- > the probability of failure increasing as the assets move further past their expected life; and
- > TransGrid's means of mitigating and repairing these failures being almost exhausted.

Broken Hill Substation is a customer connection point supplying Essential Energy's 22kV networks in the area inclusive of Broken Hill Mines and Cockburn. Broken Hill Substation is also a customer connection point for the AGL Solar Farms in the area. Key drivers for this risk cost are:

- > All the relays protecting assets at this site have either reached or will reach by 2023 their end of life, with limited spares and no manufacturer support. This increases the likelihood of a hazardous event occurring and decreases TransGrid's ability to react to mitigate or repair any failures.

Increasing maintenance on the equipment cannot reduce the probability of failure in order to reduce the risk cost.

Option A – Complete Replacement with SSBs [[OFR 1193A](#), [OFS 1193A](#)]

Option A is to carry out the complete upgrade and renewal of secondary systems at Broken Hill Substation by using modular Secondary Systems Building (SSBs) and installing new cable throughout the substation. This option will modernise the automation philosophy to current design standards and practices and will provide additional operational benefits.

This option assumes that the new secondary systems will be designed to be accommodated within a similar panel arrangement as the existing installation. Redundant panels and tunnel boards in the ASB relay room will need to be progressively decommissioned and removed as the new secondary systems are cut-over and commissioned.

The expected capital costs for this option total \$10.80m. This costing is estimated using TransGrid's 'Success' estimating system. No capital expenditure would be required over the 15 year life cycle of this option through to 2038 as this involves complete replacement of the existing secondary systems.

Operating costs have been estimated at \$6k per annum for this option based on current maintenance schedule.

A benefit figure of \$88k per annum has been calculated for this option in accordance with TransGrid's Renewal and Maintenance Strategy for Secondary Systems Site Installations.

The residual risk associated with this option upon completion of the project amounts to \$2.43m per annum (base case risk cost = \$5.75m). The risk reduction is realised through the reduction in the probability of failure for all assets and the reduction in likelihood of a hazardous event due to the installation of self-checking relays.

Option B – In-Situ Replacement [[OFR 1193B](#), [OFS 1193B](#)]

Option B is to carry out the complete upgrade and renewal of the secondary systems at Broken Hill Substation by reusing the existing building, tunnel boards and where practicable, the cabling. This option will modernise the automation philosophy to current design standards and practices and will provide additional operational benefits.

This option assumes that the new secondary systems will be designed to be accommodated within a similar panel arrangement as the existing installation. Redundant panels and tunnel boards in the ASB relay room will need to be progressively decommissioned and removed as the new secondary systems are cut-over and commissioned.

The expected capital costs for this option total \$5.90m. This costing is estimated using TransGrid's 'Success' estimating system. No capital expenditure would be required over the 15 year life cycle of this option through to 2038 as this is a complete in-situ replacement option.

Operating costs have been estimated at \$6k per annum for this option based on current maintenance schedule.

A benefit figure of \$35.4k per annum has been calculated for this option in accordance with TransGrid's Renewal and Maintenance Strategy for Secondary Systems Site Installations.

The residual risk associated with this option upon completion of the project amounts to \$2.67m per annum (base case risk cost = \$5.75m). The risk reduction is realised through the reduction in the probability of failure for all assets and the reduction in likelihood of a hazardous event due to the installation of self-checking relays.

Option C – Strategic Asset Replacement [[OFR 1193C](#), [OFS 1193C](#)]

Option C is to carry out the replacement of individual secondary system assets at Broken Hill Substation that are in need of renewal during the 2018-2023 regulatory period. This option involves replacing the old assets "like for like" with a modern equivalent asset by utilising the existing building, tunnel boards and where practicable, the cabling. This option excludes additional system modification or delivery of additional functionality.

The expected capital cost for this option total \$3.80m. This costing is estimated using TransGrid's 'Success' estimating system. A further \$1.48m of capital expenditure would be required over the 15 year life cycle of this option through to 2038 to replace the remaining secondary systems asset.

Operating costs have been estimated at \$6k per annum for this option based on current maintenance schedules.

Due to the "like for like" nature of this option, no benefit has been calculated in accordance with TransGrid's Renewal and Maintenance Strategy for Secondary Systems Site Installations¹.

The residual risk associated with this option upon completion of the project amounts to \$3.99m per annum (base case risk cost = \$5.75m). The risk reduction is realised through the reduction in the probability of failure for all assets and reduction in likelihood of a hazardous event due to the installation of self-checking relays.

Option D – 22kV Switch Room and 220kV Secondary System Building [[OFR 1193D](#), [OFS 1193D](#)]

Option D is to carry out the complete upgrade and renewal of secondary systems at the Broken Hill Substation by using modular Secondary Systems Building (SSBs), new metal clad 22kV switchgear, and installing new cable throughout. This option will modernise the automation philosophy to current design standards and practices and will provide additional operational benefits.

This option assumes that the new secondary systems will be designed to be accommodated within a similar panel arrangement as the existing installation. Redundant panels and tunnel boards in the ASB relay room will need to be progressively decommissioned and removed as the new secondary systems are cut-over and commissioned.

The expected capital costs for this option total \$12.30m. This costing is estimated using TransGrid's 'Success' estimating system. No capital expenditure would be required over the 15 year life cycle of this option through to 2038 as this involves complete replacement of the existing secondary systems.

Operating costs have been estimated at \$6k per annum for this option based on current maintenance schedule.

A benefit figure of \$88k per annum has been calculated for this option in accordance with TransGrid's Renewal and Maintenance Strategy for Secondary Systems Site Installations.

The residual risk associated with this option upon completion of the project amounts to \$1.13m per annum (base case risk cost = \$5.75m). The risk reduction is realised through the reduction in the probability of failure for all assets and the reduction in likelihood of a hazardous event due to the installation of self-checking relays.

¹ Refer SSA Strategy - Renewal and Maintenance - Secondary Systems Site Installations

4. Evaluation

Evaluation of the proposed options has been completed using the ALARP (As Low As Reasonably Practical) regulatory requirements and commercial considerations. The results of this evaluation are outlined below.

4.1 Commercial evaluation

The result of commercial evaluation for each of the options is summarised in Table 1.

Table 1 – Commercial evaluation (\$ million)

| Option | Description | Total capex | Annual opex | Annual post project risk cost | Economic NPV @10% | Financial NPV @10% | Rank |
|------------------|--|-------------|-------------|-------------------------------|-------------------|--------------------|------|
| Base Case | 'Run-to-fail' (O&M continues) | - | 0.006 | 5.75 | - | - | 5 |
| A | Complete Replacement with SSBs | 10.80 | 0.006 | 2.43 | 9.78 | (1.76) | 3 |
| B | In-Situ Replacement | 5.90 | 0.006 | 2.67 | 12.07 | 0.53 | 2 |
| C | Strategic Asset Replacement | 3.80 | 0.006 | 3.99 | 4.54 | (1.97) | 4 |
| D | 22kV Switch Room and 220kV Secondary System Building | 12.30 | 0.006 | 1.13 | 15.92 | (2.31) | 1 |

The commercial evaluation is based on:

- > Economic life of assets is assumed 15 years. Therefore the Net Present Value (NPV) assessment period is also 15 years.
- > Write-offs have been evaluated from the fixed asset register at \$92.8k in June 2023 for Option A, B, D as these three options retire few assets before the end of their financial lives.
- > Capex excludes interest during construction.

Sensitivities on all options with changing discount rate are shown in Table 2.

Table 2 – Discount rate sensitivities (\$ million)

| Option | Description | Economic NPV @13% | Economic NPV @6.75% |
|----------|--|-------------------|---------------------|
| A | Complete Replacement with SSBs | 6.21 | 15.45 |
| B | In-Situ Replacement | 8.63 | 17.43 |
| C | Strategic Asset Replacement | 2.83 | 7.41 |
| D | 22kV Switch Room and 220kV Secondary System Building | 10.83 | 23.91 |

4.2 SFAIRP/ALARP evaluation

Options to reduce the network safety risk as per the risk treatment hierarchy have been considered in other lifecycle stages of the asset, and it has been determined that no reasonably practicable options exist to reduce the risk further than those capital investment options listed below.

Evaluation of the proposed options has been completed against the SFAIRP (So Far As Is Reasonably Practicable)/ALARP (As Low As Reasonably Practical) obligation, as required by the Electricity Supply (Safety and Network Management) Regulation 2014 and the Work Health and Safety Act 2011. The Key Hazardous Events and the disproportionality multipliers considered in the evaluation are as follows:

- > Conductor drop/structure failure - 6 times the bushfire risk, 3 times the safety risk and 10% of the reliability risk (applicable to safety)

The results of this evaluation are summarised in the tables below.

Table 3 – Feasible options (\$ thousand)

| Option | Description | CAPEX | Expected Life | Annualised CAPEX |
|-------------|--|--------|---------------|------------------|
| Base | Do nothing | N/A | N/A | N/A |
| A | Complete Replacement with SSBs | 10,800 | 15 years | 720 |
| B | In-Situ Replacement | 5,900 | 15 years | 390 |
| C | Strategic Asset Replacement | 3,800 | 15 years | 250 |
| D | 22kV Switch Room and 220kV Secondary System Building | 12,300 | 15 years | 820 |

Table 4 – Annual risk calculations (\$ thousand)

| Option | Annual Residual Risk | | | Annual Risk Savings | | |
|-------------|----------------------|------------------|---------------|---------------------|------------------|---------------|
| | Safety Risk | Reliability Risk | Bushfire Risk | Safety Risk | Reliability Risk | Bushfire Risk |
| Base | 336 | 4,521 | 30 | N/A | N/A | N/A |
| A | 90 | 2,130 | 15 | 246 | 2,391 | 15 |
| B | 330 | 2,130 | 15 | 6 | 2,391 | 15 |
| C | 330 | 2,900 | 20 | 6 | 1,621 | 10 |
| D | 0 | 970 | 20 | 336 | 3,551 | 10 |

Table 5 - Reasonably practicable test (\$ thousand)

| Option | Network Safety Risk Reduction ² | Annualised CAPEX | Reasonably practicable ³ ? |
|--------|--|------------------|---------------------------------------|
| A | 1,067 | 720 | Yes |
| B | 347 | 390 | No |
| C | 240 | 250 | No |
| D | 1,423 | 820 | Yes |

4.3 Preferred option

The outcome of the SFAIRP/ALARP evaluation is that only Option A and D are reasonably practicable and Option D provides the highest network risk reductions.

The preferred option to address the condition of the secondary systems is Option D – 22kV Switch Room and 220kV Secondary System Building.

This option has been selected due to its technical viability and reduction in network safety risk. This option provides significant technical benefits and provides a positive NPV.

Capital and operating expenditure

There is negligible difference in predicted ongoing operational expenditure between the two options and the Base Case. Deploying the Complete Replacement with SSBs will provide benefits in terms of remote monitoring, control and interrogation, responding to faults more efficiently and phasing out of obsolete legacy systems. These have been captured as benefits for delivering the project.

Regulatory Investment Test

A Regulatory Investment Test for Transmission (RIT-T) is not required as this is an asset replacement project with no augmentation component.

5. Recommendation

It is the recommendation that Option D - 22kV Switch Room and 220kV Secondary System Building.

² The Network Safety Risk Reduction is calculated as 6 x Bushfire Risk Reduction + 3 x Safety Risk Reduction + 0.1 x Reliability Risk Reduction

³ Reasonably practicable is defined as whether the annualised CAPEX is less than the Network Safety Risk Reduction

Attachment 1 – Commercial evaluation report

Option A NPV calculation

Project_Option Name

Broken Hill Secondary System Renewal - Option A (Commercial)

1. Financial Evaluation (excludes VCR benefits)

| | | | | |
|-------------------------------|--------|----------|-----------------------|----------|
| NPV @ standard discount rate | 10.00% | -\$1.76m | NPV / Capital (Ratio) | -0.16 |
| NPV @ upper bound rate | 13.00% | -\$2.84m | Pay Back Period (Yrs) | 0.07 Yrs |
| NPV @ lower bound rate (WACC) | 6.75% | \$0.08m | IRR% | 6.87% |

2. Economic Evaluation (includes VCR benefits but excludes tax benefits from non-cash transactions, ENS penalty and overall tax cost)

| | | | | |
|-------------------------------|--------|----------|-----------------------|----------|
| NPV @ standard discount rate | 10.00% | \$9.78m | NPV / Capital (Ratio) | 0.91 |
| NPV @ upper bound rate | 13.00% | \$6.21m | Pay Back Period (Yrs) | 3.37 Yrs |
| NPV @ lower bound rate (WACC) | 6.75% | \$15.45m | IRR% | 23.74% |

| Benefits | | | | | |
|--|---------|---------|-----------|-----------------------------------|-----------|
| Risk cost | As Is | To Be | Benefit | VCR Benefit | \$2.18m |
| Systems (reliability) | \$4.52m | \$2.13m | \$2.39m | ENS Penalty | \$0.16m |
| Financial | \$0.74m | \$0.14m | \$0.60m | All other risk benefits | \$0.98m |
| Operational/compliance | \$0.00m | \$0.00m | \$0.00m | Total Risk benefits | \$3.32m |
| People (safety) | \$0.34m | \$0.09m | \$0.25m | Benefits in the financial NPV* | \$1.23m |
| Environment | \$0.03m | \$0.02m | \$0.02m | *excludes VCR benefits | |
| Reputation | \$0.12m | \$0.06m | \$0.07m | Benefits in the economic NPV** | \$3.25m |
| Total Risk benefits | \$5.75m | \$2.43m | \$3.32m | **excludes ENS penalty | |
| Cost savings and other benefits | | | \$0.09m | | |
| Total Benefits | | | \$3.41m | | |
| Other Financial Drivers | | | | | |
| Incremental opex cost pa (no depreciation) | | | -\$0.01m | Write-off cost | -\$0.09m |
| Capital - initial \$m | | | -\$10.80m | Major Asset Life (Yrs) | 15.00 Yrs |
| Residual Value - initial investment | | | \$1.46m | Re-investment capital | \$0.00m |
| Capitalisation period | | | 3.00 Yrs | Start of the re-investment period | 0.00 Yrs |

Option B NPV calculation

| Project_Option Name | | | Broken Hill Secondary System Renewal - Option B (Commercial) | | |
|---|---------|----------|--|-----------------------------------|-----------|
| 1. Financial Evaluation (excludes VCR benefits) | | | | | |
| NPV @ standard discount rate | 10.00% | \$0.53m | NPV / Capital (Ratio) | 0.09 | |
| NPV @ upper bound rate | 13.00% | -\$0.41m | Pay Back Period (Yrs) | 0.12 Yrs | |
| NPV @ lower bound rate (WACC) | 6.75% | \$2.06m | IRR% | 11.53% | |
| 2. Economic Evaluation (includes VCR benefits but excludes tax benefits from non-cash transactions, ENS penalty and overall tax cost) | | | | | |
| NPV @ standard discount rate | 10.00% | \$12.07m | NPV / Capital (Ratio) | 2.05 | |
| NPV @ upper bound rate | 13.00% | \$8.63m | Pay Back Period (Yrs) | 2.00 Yrs | |
| NPV @ lower bound rate (WACC) | 6.75% | \$17.43m | IRR% | 35.50% | |
| Benefits | | | | | |
| Risk cost | As Is | To Be | Benefit | VCR Benefit | \$2.18m |
| Systems (reliability) | \$4.52m | \$2.13m | \$2.39m | ENS Penalty | \$0.16m |
| Financial | \$0.74m | \$0.14m | \$0.60m | All other risk benefits | \$0.74m |
| Operational/compliance | \$0.00m | \$0.00m | \$0.00m | Total Risk benefits | \$3.08m |
| People (safety) | \$0.34m | \$0.33m | \$0.01m | Benefits in the financial NPV* | \$0.93m |
| Environment | \$0.03m | \$0.02m | \$0.01m | *excludes VCR benefits | |
| Reputation | \$0.12m | \$0.06m | \$0.07m | Benefits in the economic NPV** | \$2.95m |
| Total Risk benefits | \$5.75m | \$2.67m | \$3.08m | **excludes ENS penalty | |
| Cost savings and other benefits | | | \$0.04m | | |
| Total Benefits | | | \$3.11m | | |
| Other Financial Drivers | | | | | |
| Incremental opex cost pa (no depreciation) | | | -\$0.01m | Write-off cost | -\$0.09m |
| Capital - initial \$m | | | -\$5.90m | Major Asset Life (Yrs) | 15.00 Yrs |
| Residual Value - initial investment | | | \$0.39m | Re-investment capital | \$0.00m |
| Capitalisation period | | | 3.00 Yrs | Start of the re-investment period | 0.00 Yrs |

Option C NPV calculation

Project_ Option Name

Broken Hill Secondary System Renewal - Option C (Commercial)

1. Financial Evaluation (excludes VCR benefits)

| | | | | |
|-------------------------------|--------|----------|-----------------------|-----------|
| NPV @ standard discount rate | 10.00% | -\$1.97m | NPV / Capital (Ratio) | -0.52 |
| NPV @ upper bound rate | 13.00% | -\$2.01m | Pay Back Period (Yrs) | -0.01 Yrs |
| NPV @ lower bound rate (WACC) | 6.75% | -\$1.81m | IRR% | -0.95% |

2. Economic Evaluation (includes VCR benefits but excludes tax benefits from non-cash transactions, ENS penalty and overall tax cost)

| | | | | |
|-------------------------------|--------|---------|-----------------------|----------|
| NPV @ standard discount rate | 10.00% | \$4.54m | NPV / Capital (Ratio) | 1.20 |
| NPV @ upper bound rate | 13.00% | \$2.83m | Pay Back Period (Yrs) | 2.35 Yrs |
| NPV @ lower bound rate (WACC) | 6.75% | \$7.41m | IRR% | 24.43% |

Benefits

| | | | | | |
|---------------------------------|---------|---------|---------|--------------------------------|---------|
| Risk cost | As Is | To Be | Benefit | VCR Benefit | \$1.50m |
| Systems (reliability) | \$4.52m | \$2.90m | \$1.62m | ENS Penalty | \$0.12m |
| Financial | \$0.74m | \$0.66m | \$0.08m | All other risk benefits | \$0.14m |
| Operational/compliance | \$0.00m | \$0.00m | \$0.00m | Total Risk benefits | \$1.76m |
| People (safety) | \$0.34m | \$0.33m | \$0.01m | Benefits in the financial NPV* | \$0.26m |
| Environment | \$0.03m | \$0.02m | \$0.01m | *excludes VCR benefits | |
| Reputation | \$0.12m | \$0.08m | \$0.04m | Benefits in the economic NPV** | \$1.64m |
| Total Risk benefits | \$5.75m | \$3.99m | \$1.76m | **excludes ENS penalty | |
| Cost savings and other benefits | | | \$0.00m | | |
| Total Benefits | | | \$1.76m | | |

Other Financial Drivers

| | | | |
|--|----------|-----------------------------------|-----------|
| Incremental opex cost pa (no depreciation) | -\$0.01m | Write-off cost | \$0.00m |
| Capital - initial \$m | -\$3.80m | Major Asset Life (Yrs) | 15.00 Yrs |
| Residual Value - initial investment | \$0.00m | Re-investment capital | -\$1.48m |
| Capitalisation period | 5.00 Yrs | Start of the re-investment period | 2025-26 |

Option D NPV calculation

Project_Option Name

Broken Hill Secondary System Renewal - Option A (Commercial)

1. Financial Evaluation (excludes VCR benefits)

| | | | | |
|-------------------------------|--------|----------|-----------------------|----------|
| NPV @ standard discount rate | 10.00% | -\$2.31m | NPV / Capital (Ratio) | -0.19 |
| NPV @ upper bound rate | 13.00% | -\$3.45m | Pay Back Period (Yrs) | 0.06 Yrs |
| NPV @ lower bound rate (WACC) | 6.75% | -\$0.36m | IRR% | 6.29% |

2. Economic Evaluation (includes VCR benefits but excludes tax benefits from non-cash transactions, ENS penalty and overall tax cost)

| | | | | |
|-------------------------------|--------|----------|-----------------------|----------|
| NPV @ standard discount rate | 10.00% | \$15.92m | NPV / Capital (Ratio) | 1.29 |
| NPV @ upper bound rate | 13.00% | \$10.84m | Pay Back Period (Yrs) | 2.72 Yrs |
| NPV @ lower bound rate (WACC) | 6.75% | \$23.91m | IRR% | 28.67% |

Benefits

| | | | | | |
|---------------------------------|---------|---------|---------|--------------------------------|---------|
| Risk cost | As Is | To Be | Benefit | VCR Benefit | \$3.34m |
| Systems (reliability) | \$4.52m | \$0.97m | \$3.55m | ENS Penalty | \$0.15m |
| Financial | \$0.74m | \$0.08m | \$0.66m | All other risk benefits | \$1.13m |
| Operational/compliance | \$0.00m | \$0.00m | \$0.00m | Total Risk benefits | \$4.62m |
| People (safety) | \$0.34m | \$0.00m | \$0.34m | Benefits in the financial NPV* | \$1.37m |
| Environment | \$0.03m | \$0.02m | \$0.01m | *excludes VCR benefits | |
| Reputation | \$0.12m | \$0.06m | \$0.06m | Benefits in the economic NPV** | \$4.56m |
| Total Risk benefits | \$5.75m | \$1.13m | \$4.62m | **excludes ENS penalty | |
| Cost savings and other benefits | | | \$0.09m | | |
| Total Benefits | | | \$4.71m | | |

Other Financial Drivers

| | | | |
|--|-----------|-----------------------------------|-----------|
| Incremental opex cost pa (no depreciation) | -\$0.01m | Write-off cost | -\$0.09m |
| Capital - initial \$m | -\$12.30m | Major Asset Life (Yrs) | 15.00 Yrs |
| Residual Value - initial investment | \$0.82m | Re-investment capital | \$0.00m |
| Capitalisation period | 4.00 Yrs | Start of the re-investment period | 0.00 Yrs |