



Risk-preparedness regulation Trilogue Negotiations

Eurelectric recommendations

Eurelectric is the voice of the electricity industry in Europe.

We speak for more than 3,500 companies in power generation, distribution, and supply.

We Stand For:

Carbon-neutral electricity in Europe well before mid-century

We have committed to making Europe's electricity cleaner. To deliver, we need to make use of **all low-carbon technologies**: more renewables, but also clean coal and gas, and nuclear. Efficient electric technologies in **transport and buildings**, combined with the development of smart grids and a major push in **energy efficiency** play a key role in reducing fossil fuel consumption and making our electricity more sustainable.

Competitive electricity for our customers

We support well-functioning, distortion-free **energy and carbon markets as** the best way to produce electricity and reduce emissions cost-efficiently. Integrated EU-wide electricity and gas markets are also crucial to offer our customers the **full benefits of liberalisation**: they ensure the best use of generation resources, improve **security of supply**, allow full EU-wide competition, and increase **customer choice**.

Continent-wide electricity through a coherent European approach

Europe's energy and climate challenges can only be solved by **European – or even global – policies**, not incoherent national measures. Such policies should complement, not contradict each other: coherent and integrated approaches reduce costs. This will encourage **effective investment to** ensure a sustainable and reliable electricity supply for Europe's businesses and consumers.

Eurelectric. Electricity for Europe.

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EED Trilogue Negotiations

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KEY MESSAGES

The negotiations on the risk-preparedness file between the Commission, Council and Parliament are about to kick off and Eurelectric would like to underline its key messages while contributing to the inter-institutional debates.

Our members have identified the following as the key aspects of the Regulation:

- Eurelectric recognises the importance of this proposed Regulation which addresses how Member States should prepare themselves and co-operate with each other in order to identify and manage risks relating to security of electricity supply;
- We support the establishment of a common framework of rules on how to prevent and manage electricity crisis situations across Europe. Eurelectric also backs any clear reference in the text saying that measures for crisis management may only be used when all market-based instruments are exhausted.
- The version of the Regulation proposed by the Commission puts an emphasis on transmission grid operators and consumers' issues. However, little focus is given to power generators, which are instead mentioned in the Council's and Parliament's versions. Eurelectric believes that generators are the first frontier in the prevention and management of crises. We therefore consider that there should be specific requirements on ENTSO-E to consult directly with the generators, as well as with suppliers and other market participants.
- The Commission's proposal stipulates that a number of new entities are to be established, while some existing ones will be reinforced. Defining competences, roles and responsibilities of stakeholders and new entities should be clear in order not to create overlaps/conflicts between entities. Their added value and necessity should also be assessed as to not overcomplicate the structure.
- It should be noted that detailed rules on emergency arrangements have recently been agreed in the Emergency & Restoration Network Code. Eurelectric therefore proposes to introduce a review mechanism to ensure that the Regulation and the Emergency & Restoration Network Code are fully consistent and do not overlap, as well as ensuring appropriate cross-references to the Code.
- It is important that prevention is the key focus and Member States are encouraged to take all possible provisions to avoid crisis situations: the mitigation of the consequences of a crisis should be considered as a last resort solution.

Item	Commission	Parliament	Council	Eurelectric preferred option
Consistency with network code system operation guidelines on E&R – Non-market measures as last resort	<p>(5) The System operation Guidelines and the Network code on emergency and restoration constitute a detailed rulebook governing how transmission system operators and other relevant actors should act and cooperate to ensure system security. (...).</p> <p>This Regulation focuses on electricity crisis situations that may have a larger scale and impact. (...) Even in crisis situations, however, system operation rules should continue to be fully respected.</p>	<p>(5) The System operation Guidelines and the Network code on emergency and restoration constitute a detailed rulebook governing how transmission system operators and other relevant actors should act and cooperate to ensure system security. (...).</p> <p>This Regulation focuses on electricity crisis situations that may have a larger scale and impact. (...) Even in crisis situations, however, system operation rules should continue to be fully respected <i>and consistency between the provisions of this Regulation and the network code on emergency and restoration should be ensured.</i></p>	<p>(5) The System operation Guidelines and the Network code on emergency and restoration constitute a detailed rulebook governing how transmission system operators and other relevant stakeholders should and cooperate to ensure system security. (...).</p> <p>This Regulation focuses on electricity crisis situations that may have a larger scale and impact. (...) Even in electricity crisis situations, however, system operation rules should continue to be fully respected.</p>	<u>Parliament</u> <p>This regulation deals with the establishment of “crisis scenarios plans” both at regional and at national levels. The NC on emergency and restoration deals with national system defence plans with consultation between countries. The risk-preparedness plan in this regulation includes detailed procedures to be followed in case of electricity crisis. Similar procedures are already included in the “restoration plan” of the NC. Consistency is needed.</p>
	5.1 By [OPOCE to insert exact date: two months after entry into force of this Regulation], ENTSO-E shall submit to the Agency a proposal for a methodology for identifying the most relevant electricity crisis scenarios in a regional context.	5.1 By [OPOCE to insert exact date: six months after entry into force of this Regulation], ENTSO-E shall submit to the Agency a proposal for a methodology for identifying the most relevant electricity crisis scenarios in a regional context.	5.1 By [OPOCE to insert exact date: four months after entry into force of this Regulation], ENTSO-E shall submit to the Agency a proposal for a methodology for identifying the most relevant electricity crisis scenarios in a regional context.	<u>Council + Eurelectric's proposal</u> <p><u>The methodology shall describe specific procedure for scenarios involving sensitive information and shall take into account the plans established under the Network Code on Emergency and Restoration</u></p>

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	6.3 ENTSO-E shall update the scenarios every three years, unless circumstances warrant more frequent updates.	/	6.3 ENTSO-E shall update the <i>regional crisis</i> scenarios every <i>four</i> years, unless circumstances warrant more frequent updates. To be in line with the Emergency and Restoration Network Code, the update should occur every <i>five</i> years	<u>Council (partially)</u>
	10.1 On the basis of the regional and national electricity crisis scenarios (...), the competent authority of each Member State shall establish a risk preparedness plan. (...)	On the basis of the regional and national electricity crisis scenarios identified pursuant to Articles 6 and 7, the competent authority of each Member State shall establish a risk-preparedness plan, after consulting the electricity and gas undertakings, transmission system operators and distribution system operators , the relevant organisations representing the interests of household and industrial electricity customers and the national regulatory authority (where it is not the competent authority). The confidentiality of sensitive information relating to the prevention and mitigation of attacks shall be ensured. If a	On the basis of the regional and National electricity crisis scenarios identified pursuant to Articles 6 and 7, the competent authority of each Member State shall establish a risk-preparedness plan, after consulting relevant distribution system operators, transmission system operators, relevant producers or their trade bodies , the electricity and natural gas undertakings, the relevant organisations representing the interests of [] both industrial and non-industrial electricity	<u>Parliament + Eurelectric's proposal</u> <u>The risk preparedness plan shall take into account the plans established in application of Network Code on Emergency and Restoration</u>

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		competent authority considers that certain sensitive information is not to be disclosed, it shall provide a non-confidential summary thereof.	customers and the national regulatory authority (where it is not the competent authority).	
	7.1 (...) Member States shall identify the most relevant electricity crisis scenarios at the national level.	(...) Member States shall identify the most relevant electricity crisis scenarios at the national level, with at least the involvement of the distribution system operators, the transmission system operators and generators, whilst ensuring the confidentiality of sensitive information.	By () four months after () identification of electricity crisis scenarios at a regional level in accordance with Article 6, the designated competent authority, shall identify the most relevant electricity crisis scenarios at the national level.	<u>Parliament + Eurelectric's proposal</u> <i>The identification of crisis scenarios at national level shall be consistent with System defence plan established in application of Network code on Emergency and Restoration.</i>
	15.2 Non-market measures may be activated in a crisis situation and only if all options provided by the market have been exhausted. They shall not unduly distort competition and the effective functioning of the electricity market. They shall be necessary, proportionate, non-discriminatory and temporary.	Non-market measures shall be activated in a crisis situation only as a last resort , and only after all options provided by the market have been exhausted, and when there's ample evidence that the continuation of market activities could lead to the further deterioration of a crisis situation. Those measures shall not unduly distort competition and the effective functioning of the electricity market. They shall be necessary, proportionate, non-discriminatory and	Non-market measures () shall be activated in a crisis situation () only as a last resort if all options provided by the market have been exhausted or when market measures alone are not sufficient to prevent a further deterioration. They shall not unduly distort competition and the effective functioning of the electricity market. They shall be necessary, proportionate, non-discriminatory and	<u>Parliament</u> It is important that prevention is the key focus and Member States are encouraged to take all possible provisions to avoid crisis situations: the mitigation of the consequences of a crisis should be considered as a last resort solution and priority should be given to market-based solutions.

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		temporary. All relevant stakeholders shall be immediately informed of any application of non-market measures.	temporary.	
	15.3 Transaction curtailment including curtailment of already allocated cross-zonal capacity, limitation of provision of cross-zonal capacity for capacity allocation or limitation of provision of schedules shall only be initiated in compliance with the rules laid down in Article 14(2) of Electricity Regulation (proposed Electricity Regulation) and the rules adopted to specify this provision.	Transaction curtailment including curtailment of already allocated cross-zonal capacity, limitation of provision of cross-zonal capacity for capacity allocation or limitation of provision of schedules shall only be initiated in compliance with the rules laid down in Article 14(2) of Electricity Regulation (proposed Electricity Regulation), Article 72 of Commission Regulation (EU) 2015/1222 and the rules adopted to specify this provision.	Transaction curtailment including curtailment of already allocated cross-zonal capacity, limitation of provision of cross-zonal capacity for capacity allocation or limitation of provision of schedules shall only be initiated in compliance with the rules laid down in () System operation guideline and Network Code on electricity emergency and restoration, adopted on the basis of Articles 18 and 6 of the Regulation 714/2009 respectively.	<u>Council</u>
Timeline	3.1 As soon as possible and by [OPOCE to insert exact date: three months after entry into force of this Regulation] at the latest, each Member State shall designate a national governmental or regulatory	/	3.1 As soon as possible and by [OPOCE to insert exact date: <i>six</i> months after entry into force of this Regulation] at the latest, each Member State shall designate a national governmental or regulatory authority as its	<u>Council</u> The 3 month period proposed by the Commission for designating a competent authority is too short, especially if a new entity is to be created.

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Involvement of all the relevant competent stakeholders	authority as its competent authority in charge of carrying out tasks set out in this Regulation. Competent Authorities shall cooperate with each other for the purposes of this Regulation.		competent authority in charge of carrying out tasks <i>provided for</i> in this Regulation. Competent Authorities shall cooperate with each other for the purposes of this Regulation.	
	7.2 (...) Member States shall update the scenarios every three years, unless circumstances warrant more frequent updated.	/	(...) Member States shall update the scenarios every four years, unless circumstances warrant more frequent updated.	<u>Council</u>
	6.3 ENTSO-E shall update the scenarios every three years, unless circumstances warrant more frequent updates	/	ENTSO-E shall update the regional crisis scenarios every four years, unless circumstances warrant more frequent updates	<u>Eurelectric's proposal</u> <u>Update the scenarios every 5 years</u> To be in line with Emergency and Restoration Network Code.
Involvement of all the relevant competent stakeholders	3.1 As soon as possible and by [OPOCE to insert exact date: three months after entry into force of this Regulation] at the latest, each Member State shall designate a national governmental or regulatory authority as its competent authority in charge of carrying out tasks set out in this Regulation. Competent Authorities shall cooperate with	/	3.1 As soon as possible and by [OPOCE to insert exact date: six months after entry into force of this Regulation] at the latest, each Member State shall designate a national governmental or regulatory authority as its competent authority in charge of carrying out tasks <i>provided for</i> in this Regulation. Competent Authorities shall cooperate with each other for the purposes of this Regulation. Taking into account the responsibilities of transmission system operators and distribution system operators for reliable power system operation.	<u>Council + Eurelectric's suggestion</u> Competent Authorities shall cooperate with each other for the purposes of this Regulation. Taking into account the responsibilities of transmission system operators and distribution system operators for reliable power system operation. As TSOs and DSOs are ultimately liable for safe and reliable operation of the

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	each other for the purposes of this Regulation.		with each other for the purposes of this Regulation.	system at national level they should be involved in the process.
	5.4 Before submitting the proposed methodology, ENTSO-E shall conduct a consultation exercise involving at least the industry and consumer organisations, distribution system operators, national regulatory authorities and other national authorities. ENTSO-E shall duly take into account the results of the consultation.	Before submitting the proposed methodology, ENTSO-E shall conduct a consultation exercise involving at least the <i>regional coordination centres</i> , industry and consumer organisations, <i>generators, the transmission system operators, the distribution system operators, the competent authorities, the national regulatory authorities, other national authorities and other relevant stakeholders</i> . ENTSO-E shall duly take into account the <i>result</i> of the consultation.	Before submitting the proposed methodology, ENTSO-E shall conduct a consultation () involving at least the industry and consumer organisations, <i>producers or their trade bodies, transmission and distribution system operators, competent authorities, national regulatory authorities, other national authorities</i> . ENTSO-E shall duly take into account the results of the consultation <i>and present them, together with the proposed methodology, to the Electricity Coordination Group</i>	<u>Parliament + Eurelectric's suggestion</u> <i>...and present them, together with the proposed methodology, to the Electricity coordination group for further consideration involving again also generators, suppliers and other market participants (such as balancing responsible providers, storage providers, etc.).</i> TSOs, DSOs and generators have an essential role in maintaining secure electricity supply and network operability, and seamless cooperation between them is necessary. These actors can provide valuable contributions on the development of the methodology for identifying electricity crisis scenarios.
	8.2 Before submitting the proposed methodology, ENTSO-E shall conduct a consultation involving at least the industry and consumer, distribution operators, national regulatory authorities and other	Before submitting the proposed methodology, ENTSO-E shall conduct a consultation involving at least the <i>regional coordination centres</i> , industry and consumer organisations, <i>generators, the transmission</i>	Before submitting the proposed methodology, ENTSO-E shall conduct a consultation involving at least the industry and consumers, <i>producers or their trade bodies, transmission and</i>	<u>Parliament + Eurelectric's suggestion</u> <i>(...) involving generators, suppliers and other market participants (such as balancing responsible providers, storage providers, etc.).</i>

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	national authorities. ENTSO-E shall duly take into account the results of the consultation.	system operators and the distribution operators, the competent authorities, the national regulatory authorities, other national authorities and relevant stakeholders. ENTSO-E shall duly take into account the result of the consultation.	distribution operators, competent authorities, national regulatory authorities and other relevant national authorities. ENTSO-E shall duly take into account the results of the consultation and present them, together with the proposed methodology, to the Electricity Coordination Group for further consideration.	
	7.1 By (OPOCE to insert exact date: ten months after entry into force of this Regulation), Member States shall identify the most relevant electricity crisis scenarios at the national level.	By (OPOCE to insert exact date: twelve months after entry into force of this Regulation), Member States shall identify the most relevant electricity crisis scenarios at the national level, with at least the involvement of the distribution system operators, the transmission system operators and generators, whilst ensuring the confidentiality of sensitive information.	By () four months after () identification of electricity crisis scenarios at a regional level in accordance with Article 6, the designated competent authority, shall identify the most relevant electricity crisis scenarios at the national level,	<u>Parliament</u>
Compensation in case of assistance provided in case of crisis	16.2 The report shall include at least: (...) d) an account of the assistance provided to or received from neighbouring Member States	d) an account of the assistance prepared (with or without effective activation) provided to or received from neighbouring Member States	d) / e) to the extent possible the economic impact of the electricity crisis and the impact of the measures taken	<u>Parliament</u>

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	and non-EU countries; e) the economic impact of the electricity crisis and the impact of the measures taken on the electricity sector, in particular the volumes of energy non-served and the level of manual demand disconnection (...).	and non-EU countries; e) the economic impact of the electricity crisis and the impact of the measures taken on the electricity sector, in particular the volumes of energy non-served, the curtailment of available or allocated cross-zonal capacities and the level of manual demand disconnection (...) and the measures imposed on stakeholders such as power generators, suppliers and other relevant market participants.	on the electricity sector, in particular the volumes of energy non-served and the level of manual demand disconnection (...).	
	14.2 Where necessary and possible Member States shall offer each other assistance to prevent or mitigate an electricity crisis. Such assistance shall be subject to compensation.	Where requested and technically feasible, Member States shall assist each other so as to prevent or mitigate an electricity crisis . Such assistance shall be subject to compensation covering at least the cost of electricity delivered into the territory of the Member State requesting assistance , including, if appropriate, assistance prepared without effective activation, and the reimbursement of any	In addition, where () technically possible, Member States shall offer each other assistance () by means of coordinated measures agreed pursuant to this Article and Article 12 before assistance is provided. To this effect, and with the perspective of protecting public safety and personal security, Member States shall agree on coordinated measures of their choice in order to deliver electricity	<u>Parliament + Eurelectric's position</u> <u>Member states shall assist each other by means of coordinated measures agreed pursuant to this Article and Article 12 before assistance is provided so as to prevent or mitigate an electricity crisis – with the perspective of protection public safety and personal security.</u> To avoid subsequent complication or misinterpretation, the rules regarding this Regulation should be as detailed

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		compensation resulting from judicial, arbitration or similar proceedings and settlements and related costs of the provided assistance.	in a coordinated manner.	as possible. Therefore, the exact method for calculating the mentioned compensation should be provided in the Regulation, in an Annex.
	11.g identify possible non-market measures to be implemented in electricity crisis situations, specifying the trigger, conditions and procedures for their implementation, and indicating how they comply with the requirements set out in Article 15.	identify possible non-market measures to be implemented in electricity crisis situations, specifying the trigger, conditions and procedures for their deployment (including any compensation schemes), assessing the degree to which the use of such measures is necessary in dealing with a crisis and indicating how they comply with the requirements set out in Article 15.	identify possible non-market measures to be implemented in electricity crisis situations, specifying the trigger, conditions and procedures for their implementation, and indicating how they comply with the requirements set out in Article 15 and with regionally coordinated measures.	<u>Parliament</u>
	12.c measures to mitigate the impact of a crisis including a simultaneous crisis situation. These shall include regional load-shedding plans and technical, legal and financial arrangements regarding mutual assistance to ensure that electricity can be delivered where it is most needed and in an optimal manner. Such arrangements shall set out, inter alia, the trigger for the	(...) And arbitration rules. A mechanism of compensation for affected entities shall also be established in accordance with principles identified pursuant to Article 7a	Coordinated measures to mitigate the impact of an electricity crisis, including a simultaneous crisis situation, for the purpose of assistance as referred to in Article 14 () .	<u>Parliament</u>

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	assistance, the calculation formula or amount, paying and receiving parties and arbitration rules.			
Sensitiveness of information	6.1 By [OPOCE to insert exact date: ten months after entry into force of this Regulation] and on the basis of the methodology adopted pursuant to Article 5, ENTSO-E shall identify the most relevant electricity crisis scenarios for each region. It may delegate tasks relating to the identification of regional crisis scenarios to the regional operational centres.	<p>By [OPOCE to insert exact date: ten months after <i>the date of entry into force of this Regulation</i>] and on the basis of the methodology adopted pursuant to Article 5, ENTSO-E shall identify, <i>in close cooperation with the Electricity Coordination Group</i>, the most relevant electricity crisis scenarios for each region. It may delegate tasks relating to the identification of regional crisis scenarios to the regional <i>coordination centres</i>. <i>The regional coordination centres shall consult the Electricity Coordination Group for that purpose</i>. When identifying the risk scenarios related to malicious attacks, ENTSO-E and the regional coordination centres shall ensure that the confidentiality of sensitive information is preserved.</p>	<p>By [OPOCE to insert exact date: <input type="checkbox"/> six months after <input type="checkbox"/> <i>the approval of methodology as defined in Article 5(5)</i>] and on the basis of the methodology adopted pursuant to Article 5, ENTSO-E, <i>in close cooperation with the Electricity Coordination Group, regional security coordinators, competent authorities and national regulatory authorities</i>, shall identify the most relevant electricity crisis scenarios for each region. ()</p>	<u>Parliament</u> Confidentiality requirements required of some scenarios should be taken into account, both regarding their identification and dedicated plan.

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	5.1 By [OPOCE to insert exact date: two months after entry into force of this Regulation], ENTSO-E shall submit to the Agency a proposal for a methodology for identifying the most relevant electricity crisis scenarios in a regional context.	5.1 By [OPOCE to insert exact date: four months after entry into force of this Regulation], ENTSO-E shall submit to the Agency a proposal for a methodology for identifying the most relevant electricity crisis scenarios in a regional context.	5.1 By [OPOCE to insert exact date: six months after entry into force of this Regulation], ENTSO-E shall submit to the Agency a proposal for a methodology for identifying the most relevant electricity crisis scenarios in a regional context.	<p><u>Eurelectric's proposal</u></p> <p><i>The methodology shall describe specific procedure for scenarios involving sensitive information and shall take into account the plans established under the Network Code on Emergency and Restoration</i></p>
	10.1 On the basis of the regional and national electricity crisis scenarios (...), the competent authority of each Member State shall establish a risk preparedness plan after consulting the electricity and gas undertakings, the relevant organisations representing the interests of household and industrial electricity customers and the national regulatory authority (where it is not the competent authority). The confidentiality of sensitive information relating to the prevention and mitigation of attacks shall be ensured. If a competent authority considers that certain sensitive information is not to be disclosed, it shall provide a non-confidential summary thereof.	On the basis (...), after consulting the electricity and gas undertakings, transmission system operators and distribution system operators, the relevant organisations representing the interests of household and industrial electricity customers and the national regulatory authority (where it is not the competent authority). The confidentiality of sensitive information relating to the prevention and mitigation of attacks shall be ensured. If a competent authority considers that certain sensitive information is not to be disclosed, it shall provide a non-confidential summary thereof.	On the basis (...), after consulting relevant distribution system operators, transmission system operators, relevant producers or their trade bodies, the electricity and natural gas undertakings, the relevant organisations representing the interests of () both industrial and non-industrial electricity customers and the national regulatory authority (...).	<p><u>Council + Eurelectric's suggestion</u></p> <p><i>The confidentiality of sensitive information relating to the prevention and mitigation of attacks shall be ensured (incl. malicious attacks).</i></p> <p>A cautious approach should be adopted regarding sensitive information from national and regional scenarios.</p>

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	7.1 (...) Member States shall identify the most relevant electricity crisis scenarios at the national level.	(...) Member States shall identify the most relevant electricity crisis scenarios at the national level, with at least the involvement of the distribution system operators, the transmission system operators and generators, whilst ensuring the confidentiality of sensitive information.	By () four months after () identification of electricity crisis scenarios at a regional level in accordance with Article 6, the designated competent authority, shall identify the most relevant electricity crisis scenarios at the national level.	<u>Parliament</u>
Non-EU countries	18 Member States and the Energy Community Contracting Parties are invited to closely cooperate (...). In this respect, Energy Community Contracting Parties may participate in the Electricity Coordination Group upon invitation by the Commission with regard to all matters by which they are concerned.	/	Where the Member States and the Energy Community Contracting Parties () cooperate in the area of security of electricity supply, such cooperation may include defining a crisis situation (...).	<u>Commission + Eurelectric's proposal</u> <i>"the same should apply to well interconnected non-EU countries within synchronous areas of the Union."</i> The regulation should foresee the possibility for well interconnected third countries to maintain the current status of integration to ensure the highest degree of risk-preparedness possible in Europe.

eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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