Energy Efficiency Directive in the Energy Community

Impact and possible adaptation areas

Content

1. Background

The Energy Efficiency Directive (EED) 2012/27/EU was adopted on 25 October 2012, repealing the Energy Services Directive (ESD – 2006/32/EC) as well as the Cogeneration Directive (2004/8/EC), and is to be transposed by all Member States (MS) by 30 June 2014.

The new EED Directive establishes a common framework of measures for the promotion of energy efficiency within the Union in order to ensure the achievement of the Union's 2020 20 % headline target on energy efficiency and to pave the way for further energy efficiency improvements beyond that date.

It lays down rules designed to remove barriers in the energy market and overcome market failures that impede efficiency in the supply and use of energy, and provides for the establishment of indicative national energy efficiency targets for 2020.

2. Rationale for EED adoption

The Energy Community needs to have stricter and more ambitious targets and measures that will deliver the expected energy efficiency benefits.

ESD is not delivering enough savings

The ESD Directive was the first step to tackle the barriers and from this perspective, it was a milestone in energy efficiency policy development. It encouraged the introduction of a number of concrete policies at national level. However, frequently 'soft' and open wording has not been sufficient to overcome the main barriers to energy efficiency (the analysis was made for the EU MS). Based on the EU **mid-term evaluation of the ESD shows that it has not succeeded in tapping the full energy saving potential of the sectors it covers.**

This is because the current ESD non binding target is based on proving 9% end use energy savings in 9 years against the average of a five year base period. These savings are relative and do not necessarily translate into consumption reduction.

The first NEEAPs **proved to be useful tools but the measurement of savings is complicated**. For many Contracting Parties (CP) the 1st NEEAP prepared in 2009/2010 was their first attempt to have a comprehensive overview of energy efficiency (EE) potential, measures and policies. The NEEAP also helped CPs to build their institutional capacity. However, the coverage of the NEEAPs limited to end use

sectors has sometimes led CPs to over-focus on certain end-use sectors and overlook other energy saving potentials.

Although the Energy Community has not adopted an overall target on energy efficiency by 2020 like the European Union, where this was the driving force for adopting the EED, it may have other reasons for wanting to move forward more ambitiously on energy efficiency Agenda. Some of the reasons are described in the next paragraphs:

- In each Contracting Party, as well as at the entire Energy Community, there is a remaining economic potential for energy efficiency in each sector (from energy transformation to energy use) and this is not harvest.
- Important challenges such as insufficient political commitment and underdeveloped markets for energy efficiency improvements, low awareness of the possibilities and insufficient of incentives for uptake of energy efficiency improvements at demand and supply need to be addressed in a holistic manner, which includes also the legal framework.
- At present, Energy Community economies are still “protected” by regulated, low and mostly non cost reflective energy (especially for electricity) prices. This situation is unsustainable, and therefore, energy prices will have to be increased significantly sooner than later, and their impact on the countries’ loss of competitiveness on markets that become more and more global, will be dramatic. A similar significant impact will be on households’ energy bills, as well as on those of the public sector.
- Increased energy efficiency will help not only reducing the overall country’s cost with energy, but moreover, will have a significant positive impact on the public budget, by reducing also the needs for additional, expensive energy imports , or additional new, large generation capacities.
- Making the Energy Community economy more energy efficient will also have positive impacts in terms of economic growth and job creation. Vulnerable energy consumers can be tackled strategically by supporting them to make energy efficiency improvement investments.

The new EED is largely a recast ESD, therefore it would be very appropriate to take up the new Directive, instead of continuing with the implementation of the old ESD. In terms of timing, this is again most adequate, as the large majority of the Contracting Parties, have adopted the ESD and Labeling in their primary legislation, and are now preparing the secondary legislation; this is where, the clearer implementation requirements of the EED compared to the ESD will be of great help. From the Secretariat’s point of view and insight, transposition of the new Directive would not lead to an interruption of the transposition process, but on the contrary could be included swiftly in line with the ongoing efforts made on national level.

3. Summary of the actions proposed by the Energy Efficiency Directive

For end-use sectors, the Directive focuses on measures that lay down requirements on the public sector, both with regards to renovating the buildings it owns, and also by applying high energy efficiency standards to the public purchase of buildings, products and services.

The Directive requires Member States (Contracting Parties) to establish national energy efficiency obligation schemes, imposed to energy distributors or retail energy sales companies.

It requires regular mandatory energy audits for large companies and lays down a series of requirements on energy companies regarding metering and billing.

For the energy supply sector, the Directive requires Member States (Contracting Parties) to adopt national heating and cooling plans to develop the potential for high-efficiency generation and efficient district heating and cooling, and to ensure that spatial planning regulations are in line with these plans.

Member States (Contracting Parties) must adopt authorisation criteria that ensure that installations are located in sites close to heat demand points and that all new electricity generation installations and existing installations that are substantially refurbished are equipped with high-efficiency CHP units.

Member States (Contracting Parties) should however be able to lay down conditions for exemption from this obligation where certain conditions are met.

The Directive also requires Member States (Contacting Parties) to establish an inventory of energy efficiency data for installations undertaking the combustion of fuels or the refining of mineral oil and gas and sets requirements on priority/guaranteed access to the grid, priority dispatch of electricity from high-efficiency cogeneration and the connection of new industrial plants producing waste heat to district or cooling networks.

Other measures proposed include efficiency requirements for national energy regulatory authorities, information and awareness-raising actions, requirements concerning the availability of certification schemes, action to promote the development of energy services, and an obligation for Member States (Contracting Parties) to remove obstacles to energy efficiency.

Finally, the proposal provides for the establishment of national energy efficiency targets for 2020.

4. Impact of the EED

The European Commission has done an impact assessment (the Commission staff working paper), which was used to craft the EED proposal in 2011. The assessment referred to the impact analysis of several possible options for policy tools, measures, sectors, etc. Since then, Directive 2012/27/EU was already adopted, and therefore the options are clear and reflected in its articles, and hence a similar "impact assessment" of the EED for the case of the Energy Community is no longer relevant.

Nevertheless, the impact of the policy options may be assessed and it may lead to the proposal for adaptation of some of the provisions of the EED to reflect better the Energy Community situation and to serve its needs.

The impact of the policy options proposed by the EED may be analysed on two levels:

1. Improvement of the current policy framework
2. Tackling the remaining economic potential.

4.1 Policy framework

On the first level, the EED contributes to the simplification of the *Acquis*. All CPs have adopted the Energy Services Directive (ESD) and some of them the Co – generation Directive as well.

As a result of adopting EED, the ESD and the Cogeneration Directives will be replaced by a single Directive, giving a more integrated approach to energy efficiency and savings. Some administrative simplification should also result from the need to transpose only one Directive instead of two. Some of the Contracting Parties have already adopted the CHP Directive, on their own initiative.

Reporting obligations are currently laid down in both Directives. They will be replaced by a single set of annual reports (in-depth every three years).

Furthermore, EED simplifies the energy saving measurement requirements contained in the existing ESD. In this sense, it should help achieve a significant reduction in the administrative burden currently faced by the Contracting Parties.

In the case that EED is not adopted, this would mean that no further target is set after 2018 when the effect of ESD target ceases, and under the current format of target setting of ESD, the target cannot easily be monitored through the official statistics.

4.2 Economic potential

On the second level policy options, the EED brings different measures to tackle the remaining potential at the demand and supply side. These measures include among others:

a. Energy Efficiency Obligation Schemes

Energy Efficiency Obligations existed also in the ESD as only one of the options provided to ensure that energy utilities provide energy savings in end-use sectors; nevertheless, the present provisions on this topic in the ESD have had a limited impact on energy savings and and were difficult to implement due to their broad and generic character (EU analysis).

Under the EED, Article 7 requires that "Each Member State shall set up an energy efficiency obligation scheme. That scheme shall ensure that energy distributors and/or retail energy sales companies that are designated as obligated parties under paragraph 4 operating in each Member State's territory achieve a cumulative end-use energy savings target by 31 December 2020, without prejudice to paragraph 2. The target shall be at least equivalent to achieving new savings each year from 1 January 2014 to 31 December 2020 of 1.5 % of the annual energy sales to final customers of all energy distributors or all retail energy sales companies by volume, averaged over the most recent three-year period prior to 1 January 2013. The sales of energy, by volume, used in transport may be partially or fully excluded from this calculation".

- **Impact on energy consumption**

The impact of energy efficiency obligations on energy savings depends on the level of ambition and the comprehensiveness of the scheme. It is assumed that the binding character of the obligations to be placed on energy suppliers/distributors will mean that in both cases these obligations are fully translated into energy savings.

Nevertheless, having in view that the CPs have a lower level of economic development compared to the EU MS, demonstrated also by the energy consumption per capita; in the Energy Community, the average is approx. of 1.4 toe/capita, significantly lower than that of approx. 2.45 toe/capita in the EU Member States. Therefore, consumption per capita in the Energy Community is expected to grow, once the rate of GDP growth will recover to the level pre financial and economic crisis.

The ECS proposal is to introduce a gradual savings target equivalent to 1.0% /year for the period 2016-2025, and respectively to 1.5 %/year between 2025 and 2030, of the annual sales by volume. This proposal is also justified by the fact that the EU MS are allowed to exclude from calculation of the annual energy sales all or part of the sales, by volume of the energy used in industrial activities listed in Annex I to Directive 2003/87/EC (the ETS Directive); the Contracting Parties are not participating in the ETS, therefore they are not allowed to deduct these sale volume.

- **Economic impact**

The introduction of saving obligations for energy suppliers/distributors is estimated to have a positive economic impact, by leading to additional investment in energy efficiency.

- **Enhanced competitiveness**

The economic benefits of measures to promote improved energy efficiency are significant. Promoting cost effective increases in the penetration of energy efficient devices could reduce energy system costs on an average by as much as by 3.7 % and energy imports may be decreased by approx. 6 - 10% compared to the reference scenario[1] . The reduction in energy system cost is mainly due to the reduction of fuel expenditure over the life of energy efficient devices, which exceeds their higher investment costs. In addition, since demand for electricity is lower in the energy efficiency case, the higher payments for more expensive demand appliances or energy using products is further offset by reduced investments in new generation capacity.
These improvements will also reduce industry's production costs thus increasing competitiveness.

- **Social impact**

In most cases, at the household level, increased energy efficiency could lead to lower fuel bills thereby increasing purchasing power and have a positive employment impact.

b. Further measures to realise the potential at the end-use sector

In order to realize the potential, additional/stricter measures are introduced by the EED; these include, among others:

1. Increased role of the public sector
2. Information on savings provided to residential consumers and to industry
3. Support for the development of energy service companies.

Under the increased role of the public sector, one of the important impositions (Article 4 and 5) is for the central government to renovate 3% per year of the building stock owned occupied by it, when these do not meet the minimum energy performance requirements.

The Directive gives also an option to MS/CPs to extend the application of this obligation to the floor area occupied and owned by administrative departments at a level bellow central government.

The cost effective energy savings potential in the public sector (especially health, education and offices) is significant; this represents between 20% and 54 % or the respective sector energy consumption[2].

The investments required for deep renovation of these buildings have an average discounted payback period of 9 years; for more details please see Annex A to this document.

In the application of this Article, Contracting Parties may take advantage of the methodology for developing a Building Stock Inventory, as well as of the methodology for defining reference buildings prepared within the Study: Energy Efficiency in Buildings commissioned by the Energy Community Secretariat and prepared by ENSI (Energy Saving International AS) Norway in 2012.

There are two potential bottlenecks to the EED proposed rate of renovation:

1. The public funding is scarce and the fiscal space getting tighter because of the global financial and economic crisis
2. The construction sector of each might find it difficult to meet the increased demand for rehabilitation works, and hence suboptimal renovations could be expected.

[1] USAID and Hellenic Aid funded programme SYNERERGY STRATEGIC PLANNING FINAL REPORT
[2] Energy Efficiency in Buildings in the Energy Community, Study, ENSI AS, 2012

In order to remove or reduce the first barrier and to achieve a significantly accelerated retrofit rate, a possible option is to introduce certain financial and technical assistance instruments in the CPs; these may combine funding (market based or concessional rates) and technical assistance to national, regional and local public authorities to implement energy efficiency improvements of the building stock they own.

There would be a need to achieve a maximum leverage ratio between public grants and final investment volume. These instruments would channel money from various sources to support investments in energy efficiency improvements of buildings. They can be set up at national, regional and local level and their design and objectives will vary according to the specific characteristics and needs. These instruments can provide support to preferential loans, or loans combined with performance linked grants, or guarantee/risk sharing facility.

5. Technical and financial assistance available for the implementation of the proposed EED

There are already a number of programmes and projects in place or under development that are assisting the Contracting Parties to implement the current Acquis on energy efficiency, but also the EED when adopted. The included, but not limited to:

5.1 Regional Energy Efficiency Programme - EBRD

The Energy Community is implementing with EBRD a Regional Energy Efficiency Programme (REEP) that supports energy efficiency in the Western Balkan countries with a focus on the public sector; the 20 Million Euro programme is funded through the Western Balkans Investment Framework (WBIF) and is accompanied by a 75 million Euro financing facility WeBSEFF II from the EBRD.

The funding will be used to support sustainable energy in the Western Balkans. The approach contains three different activities, built on a combination of the following pillars:

1. **Policy dialogue** to support the development of an enabling environment for sustainable energy, which is divided into an ESCO relevant assignment and non-ESCO assignment;
2. **Technical assistance and grant elements** to support project preparation, project implementation and capacity development; and
3. **Financing instruments** for specific energy efficiency or renewable energy investments with clear estimates of energy savings and carbon emission reductions.

The aim will be achieved through activities that support legislators and investors to eliminate market barriers to energy efficiency, and accelerate the take up of energy services. This will involve work across three domains that have been selected in consultation with regional stakeholders:

- Supporting NEEAP implementation through energy supply utility participation as well as energy tariff reform, energy metering and billing;
- Assistance with transposition of Energy Performance of Buildings Directive (EPBD); and
- Public procurement codes – appliance and equipment purchase guidelines.

5.2 Scaling Up Energy Efficiency in Buildings in the Western Balkans

Another regional activity that supports energy efficiency in buildings is implemented with the technical assistance of the World Bank.

The activity objective is to scale-up energy efficiency improvements in buildings in the selected countries by developing a roadmap for implementation and sharing of best practices, policy and implementation options, case studies and plans across the target countries. Efforts would focus on replicable and

scalable institutional and financing models in order to develop a set of recommendations and actions that the countries would need to take to realize substantial energy savings in this sector.

It would also provide the necessary operational modalities and a platform to discuss national and regional-level programs with the World Bank, the EU and other donors, in order to help better align and collaborate on country-owned building EE programs.

The roadmap would include policy measures (from building codes to permitting), building ratings and passports, audits and retrofits, energy management systems, energy performance contracting, financing schemes, etc.

5.3 Support for efficient heating and cooling

The Western Balkans Contracting Parties have applied for a **Sector Study on Biomass-based Heating in the Western Balkans** to the WBIF in 2013. The study will be implemented by the World Bank as lead IFI, in close cooperation with the Energy Community Secretariat.

The Study will make recommendations on policy, regulatory and institutional reform and strengthening linked to efficient use of biomass; it will propose the key factors for identifying most viable and bankable biomass heating investment options, financing, and investment promotion actions needed to increase sustainable supply and use of biomass for heating purposes in the region. This will also include discussion of indicative investment costs and financing options, as well as recommendations to improve efficiency and sustainability of current biomass use, such as energy efficiency improvements of traditional wood-fired stoves or boilers.

5.4 Financing energy efficiency – IFI Coordination Office

In order to assist the Contracting Parties in the implementation of energy efficiency measures, DG Enlargement, through the IFI Coordination Office commissioned a report in 2011 that identified a long list of potential instruments used to finance EE activities both in the EU Members States (MS) and in the Western Balkans. They were timed to facilitate the preparation of the second NEEAPs by the Contracting Parties.

An updated version of the report is being prepared in consultation with the countries ministries of finance and the ECS. Based on a review of the experiences in EU member states and the situation in the Western Balkans, the following mechanisms have been identified as potentially suitable for use in the region. These have been grouped in terms of[3]:

- Financial mechanisms – EE activities financed from loans/credit schemes;
- Fiscal mechanisms – EE activities financed and/or stimulated by the use of taxes;
- Delivery mechanisms – EE activities stimulated by the availability of specific assistance or imposition of certain legal obligations;
- Institutions – EE activities developed/managed by public institutions.

The mix in each country will depend on the fiscal space for government borrowing and the policy choices preferred by each government.

[3] Financing Energy Efficiency in the Western Balkans – Public finance options to fund the Second NEEAP, IFI Coordination Office , February 2013

6. Areas for adaptation of the EED to the Energy Community

The EED repeals two existing Directives: the Cogeneration Directive (2004/8/EC) and the Energy Services Directive (2006/32/EC) and some Articles 9 (1) and (2) of the Energy labelling directive. It also makes reference to the Directive 2003/87/EC on establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC, as well as to the Eco design directive 2009/125/EC.

It also makes reference to certain sources of funding that are only applicable to the EU MS.

Therefore, the EED adoption in the Energy Community must take into account certain adaptations that should reflect the legal, institutional framework and also the economic situation of the Contracting Parties.

Therefore the proposed areas for significant adaptations are the following:

Article 3: Energy efficiency targets

The Directive requires the EU MS to set an "indicative national energy efficiency target" taking into account that the Union's 2020 energy consumption has to be no more than 1 474 Mtoe of primary energy or no more than 1 078 Mtoe of final energy; these are figures deriving from the EU 2020 goals.

The time horizon for the EU in the EED was set to 2020 because of the EU goals, but the Energy Community is not bound by the same goals, and may set its own timeline. ECS proposes 2025, respectively 2030.

The Energy Community has not set any such goals at present, and therefore it should propose the same saving (%) target for each CP. Having in view that by implementing the ESD, the CPs would have reached 9% savings target by 2018 (at a rate of approx.1% per year), ECS is proposing a national energy saving target of 20% by 2025, and respectively 30% by 2030, from the final energy consumption.

Article 5: Building renovation

The EED imposes the obligation to retrofit yearly 3% of the buildings space owned by public bodies, to cost optimal level should be adapted.

The Secretariat's proposal is to introduce a gradual requirement for renovation as follows:

- 2% per year, from 01.01.2014 to 30.06. 2019
- 3% per year, from 30.06.2019 to 31.12.2030

The reason for that is the following: in many CPs of the Western Balkans, the public buildings retrofit started in the past 5-6 years with IFIs loans given to the Government (e.g. Serbia, Montenegro, fyr of Macedonia); although this is a good start, it is most probable not sustainable, especially at present times when public budgets are very tight and the level of indebtness is medium to high in most CPs; the second and more market oriented alternative is to use third party financing and energy service providers for the buildings retrofit; nevertheless, the market for ESCOs and energy services is not yet so developed and therefore the large majority of retrofits would still have to rely on public funds in the early stage of the new EED implementation.

The funding of these measures in the EU MS can be done with structural and cohesion funds, while the Energy Community has no such large funds available for similar investments. Therefore, the Western Balkan CPs need to be able to use a significant amount of funds from the IPA II framework dedicated to

this aim, while the non-IPA countries (Moldova and Ukraine) will need to get these from Neighborhood Investment Fund, or similar.

Article 7: Energy Efficiency Obligation Schemes

The Directive provides for national energy saving obligations imposed on energy distributors and retail energy sales companies to save at least the equivalent of 1.5 % of their annual energy sales from January 2014 to December 2020, compared to the average of volumes sold in the most recent three year period; it also provides for the possibility to exclude from the calculation, all or partial sales of energy, by volume used in transport, and in industrial activities listed under the ETS Directive.

The adaptation proposed by ECS for the Energy Community is to set the target for all energy distributors and/or retail energy sales companies as the equivalent of 1% of the annual sales between 2015 and 2025 and 1.5% between 2025 and 2030.

The justification for the reduced target in the first period is that in the case of the CP, the energy consumption of approx.1.4 toe/capita, i.e. quite low compared that of the EU MS of approx.2.45 toe/capita. It is expected in the Energy Community that the consumption per capita will grow to reflect the development in the Energy Community.

Moreover, the EU MS may deduct from the calculation of sales by volume all or parts of the energy used in the emissions trading scheme (ETS) installations, which is not applicable in the Energy Community.

Article 14: Promotion of efficiency in heating and cooling

Paragraph 5(a): The requirement to conduct a cost-benefit analysis relates to converting to high-efficiency cogeneration any installation over 20 MW that is substantially refurbished. The threshold of 20 MW thermal input is related to the ETS scheme, which is not applicable to the Energy Community.

The Energy Community adaptation proposes the threshold of 50 MW thermal input, as it is in the Large Combustion Plants Directive, and also the Industrial Emissions Directive.

Article 15: Energy transformation, transmission and distribution

Paragraph 4 and 5: the deadlines and the formulations need to be aligned with those stemming from the MC decisions regarding the 3rd internal energy market package and the RE directive.

Paragraph 9: refers to provisions of the Industrial Emissions Directive 2010/75/EU that is not (yet) applicable to the Energy Community.

Article 20(7): Energy Efficiency National Fund, Financing and Technical Support

These provisions refer to revenues for annual emissions allocations (ETS scheme) that are not valid for the Energy Community. This source of revenues may need to be substituted with others linked to EU grant funding.

All the other EED articles not mentioned above, may not require any adaptation or will require simple ones like, for example: Energy Community institutions replacing EU ones, removing articles that make reference to EU *acquis* that is not applicable to the Energy Community, as well as to sources of funding available for the EU and not for the Energy Community.

Furthermore, the individual deadlines per articles, as well as the general one for the EED needs to be adapted following the discussions in the Energy Community institutions.

7. Conclusions

In summary, the Directive would change the “consumer behavior” of several categories of actors:

- Public bodies would need to buy energy-efficient buildings, products and services, and refurbish 2% of their buildings each year, respectively 3% in the later stage, to drastically reduce their energy consumption.
- Energy utilities would have to encourage/invest at end users to cut their energy consumption through efficiency improvements such as the replacement of old boilers or insulation of their homes.
- Industry would be expected to become more aware of energy-saving possibilities, with large companies required to undertake energy audits every 3 years.
- Consumers would be better able to manage their energy consumption thanks to better information provided on their meters and bills.
- Energy transformation would be monitored for efficiency, with the EU/Energy Community proposing measures to improve performance if necessary, and promoting cogeneration of heat and electricity.
- National energy regulatory authorities would have to take energy efficiency into account when deciding how and at what costs energy is distributed to end users.
- Certification schemes would be introduced for providers of energy services to ensure a high level of technical competence.

Therefore the Secretariat proposal is to adapt and adopt the Energy Efficiency Directive as soon as possible, in the form of a Recommendation of the Ministerial Council in October 2013, and of a Decision in October 2014.

Annex A

Cost effective energy saving potential in public sector in the Enervy Community 2011 -2020

Contracting Party	Sector	Surface sqm	Savings (mil. Euro)	Investments (mil. Euro)	Savings %	Simple Payback Period Years	Discounted Payback Period (Years) with 8% rate
	Education	6.279.000,0	7,8	45,50	20,0	5,8	9
Albania	Health	755.000,0	4,66	39,00	28,0	8,4	15
	Offices, trade	5.451.000,0	7,2	48,28	20,0	6,7	9
	Education	2.540.000,0	7,18	63,43	34,0	8,8	15
Bosnia and Herzegovina	Health	1.100.000,0	10,8	64,19	37,0	5,9	9
	Office	12.250.000,0	53,5	411,44	33,0	7,7	13
	Education	7.140.000,0	25,3	170,33	54,0	6,7	11
Croatia	Health	2.100.000,0	20,25	120,99	34,0	6,0	9
	Offices, trade	28.790.000	148,5	960,00	47,0	6,5	10
	Education	1.667.200,0	7,8	52,15	33,0	6,7	9
fyr of Macedonia	Health	539.200,0	3,71	24,25	33,0	6,5	9
	Offices, trade	6.277.000,0	9,79	55,60	20,0	5,7	7
	Education	4.045.000,0	6,61	35,26	20,0	5,3	8
Kosovo*	Health	553.000,0	4,13	24,10	30,0	5,8	9
	Offices, trade	2.770.000,0	8,59	54,26	28,0	6,3	10
Montenegro	Offices, trade, hotels, public buildings	4.800.000,0	14,85	113,39	45,0	7,6	13
	Education	4.336.960,0	4,4	21,41	11,0	4,8	7
Moldova	Health	1.419.000,0	5,8	36,11	25,0	6,3	8
	Offices, trade	788.540,0	1,1	7,89	19,0	7,4	12
	Education	11.252.000,0	25,0	144,43	24,0	5,8	9
Serbia	Health	4.000.000,0	24,4	179,22	27,0	7,3	12
	Office	30.000.000,0	87,4	626,00	34,0	7,2	12
	Education	83.205.700,0	341,1	3411,43	35,0	10,0	20
Ukraine	Health	22.470.000,0	94,4	1017,89	32,0	10,8	25
	Office	10.050.000,0	39,2	391,95	30,0	10,0	20