

**Ukraine Energy Market Observatory**

**On the Draft Law No.13219  
concerning the improvement of  
competitive support schemes for  
electricity generation from  
renewable energy sources**

**Assessment 3/25**

July 2025

## **Purpose statement**

Assessment of the Draft Law No.13219 concerning the improvement of competitive support schemes for electricity generation from renewable energy sources in the context of Ukraine's obligations under the Energy Community acquis and its impact on the renewable energy deployment.

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## Ukraine Energy Market Observatory Assessment 3/25

# On the Draft Law No.13219 concerning the improvement of competitive support schemes for electricity generation from renewable energy sources

### 1. Background

Since 2019, Ukraine has introduced a support quota auction mechanism for renewable energy (Article 93 of the Law of Ukraine “On Alternative Energy Sources”<sup>1</sup>). However, no auctions were conducted until 2024, during which time the necessary legislation was developed, and an electronic auction system was prepared using the JSC ‘Prozorro.Sale’ platform.

In 2024, following a series of large-scale attacks on Ukraine’s energy infrastructure and the resulting loss of generation capacity, the government decided to launch pilot auctions to support the construction of new RES generating facilities aimed at compensating for the destroyed capacities and strengthening the power system.

According to the Cabinet of Ministers’ Order No. 757-r dated 13 August 2024,<sup>2</sup> three pilot auctions were scheduled for a total of 110 MW: 11 MW for solar PV, 88 MW for wind, and 11 MW for other technologies (biomass, biogas, small hydro). These auctions were held in October–November 2024.

The 2024 Auctions Summary is presented in the table below.

Date & Time	Type of Auction	Energy Source	Annual Quota (kW)	Max Price (€/kWh)	Region	Auction Type	Auction Status	Number of bidders	Distributed quota (kW)
31.10.2024 12:55	Solar energy	Solar radiation energy	11000	9	Left bank of the Dnipro River*	Closed	The auction did not take place	0	0
14.11.2024 11:00	Other renewable sources (excluding solar & wind)	Biomass, Biogas, Small Hydro	11000	12	Entire Territory	Closed	Contract signing with the winners is in progress	2	900
29.11.2024 11:55	Wind energy	Wind	88000	9	Entire Territory	Closed	The auction did not take place	1	0

**Note:** The Left bank of the Dnipro River is specified for the solar energy auction on 31.10.2024.

<sup>1</sup> <https://zakon.rada.gov.ua/laws/show/555-15#Text>

<sup>2</sup> <https://zakon.rada.gov.ua/laws/show/757-2024-%D1%80#n16>

At the same time, an analysis of the auction results in 2024 revealed low investor interest in participation. Of the three auctions conducted, only one resulted in the award of a quota—0.9 MW for a small hydropower plant. The remaining quota for the small hydropower plant — 0.62 MW — was offered to the second-ranked participant, who declined the offer.

The wind auction attracted only a single bidder, which was insufficient to proceed, as the rules stipulate a minimum of two participants for the auction to be considered valid.

The overall assessment of the 2024 auctions for the additional RES support quota distribution remains negative. Potential investors are more concerned about the systemic issues in the Ukrainian electricity market, including regular delay in payments for sold electricity and Guaranteed Buyer's increasing debts which still remain due to the persistent deficit tariff of TSO Ukrenergo, which fails to cover the RES surcharge adequately, overall market debts, particularly on the balancing market (among other things, due to significant non-payments by end consumers).

In addition, Russia's ongoing aggression against Ukraine has created further risks, such as the destruction and damage of infrastructure, a shortage of qualified personnel to implement projects, and the inability to engage foreign contractors. Nevertheless, these war-related challenges were considered secondary to broader market risks. Technical issues, such as the limited size of the quotas—insufficient to support large-scale projects—were also cited as areas of concern.

In 2025, the negative trends in renewable energy auctions have continued. Overall, according to the annual quota, the Ukrainian government approved<sup>3</sup> a total renewable energy support quota of 330 MW for 2025, distributed as follows:

- Solar PV: 33 MW (scheduled for March 2025)<sup>4</sup>
- Wind Power: 100 MW (April 2025) and 150 MW (July 2025)
- Other Renewables (e.g., biomass, biogas, small hydro): 47 MW (scheduled for May 2025).

The Order Cabinet of Ministers also established indicative targets for auctions in 2026–2029, totaling 1.5 GW.

The first renewable energy auction of 2025, for 33 MW of solar PV, scheduled for 13 March, did not take place due to a lack of participants. Similarly, the wind power auction for 100 MW on 4 April was also cancelled for the same reason. The auction for other renewables, planned for 12 May, is likewise considered as “not having taken place” due to the absence of participants.

## 2. Market/impact assessment

Draft Law No.13219<sup>5</sup> is proposing key changes to Ukraine renewable energy support system, aiming to make it more effective.

One of the key proposals is to replace the current auctions scheme for Contracts for Difference (CfD or two-sided sliding premium) model with a so-called “pure” market premium mechanism (one-sided sliding premium) for auction winners, valid until 31 December 2029. Under the CfD model, if the electricity market price exceeds the auction price, producers must return the positive difference to the Guaranteed Buyer. And the other way around, if the electricity market price is below the auction price, producer receives the difference from the Guaranteed Buyer. Given that current and expected electricity prices exceed the auction cap (over 10 euro cents/kWh vs the auction cap of 8 euro cents/kWh), participating producers

<sup>3</sup> Order of the Cabinet of Ministers of Ukraine No. 1195-r dd 29 November 2024, <https://zakon.rada.gov.ua/laws/show/1195-2024-%D1%80#Text>

<sup>4</sup> The Left bank of the Dnipro River is specified for this auction

<sup>5</sup> <https://itd.rada.gov.ua/billinfo/Bills/Card/56245>

would incur financial losses relative to selling on the market. The shift to a so-called “pure” market premium would allow producers to operate under full market terms, while receiving a safety net from the state only when market prices fall below the auction price. This arrangement is presumably designed to make the support scheme more attractive to producers while providing predictability and revenue stability. However, this mechanism does not address the broader concerns potential investors have regarding systemic issues in the Ukrainian electricity market, particularly the structural problems of the Guaranteed Buyer. To restore investor confidence, the renewable energy surcharge must be separated from the electricity transmission tariff and transparently funded through a dedicated levy. At the same time, the National Energy and Utilities Regulatory Commission of Ukraine (NEURC) must reform its tariff-setting methodology to fully reflect the actual costs of the RES surcharge, ensure strict enforcement of payment discipline across the supply chain, and introduce a credible plan for repaying existing debts.

Furthermore, to enhance the effectiveness of the existing Contract for Difference (CfD, or two-sided sliding premium) scheme in Ukraine—rather than shifting to a “pure” market premium mechanism—several key electricity market reforms are essential. These reforms include improving day-ahead market liquidity and transparency to ensure a reliable reference price for CfD settlements and developing a functional balancing market with fair access and clear imbalance rules to reduce operational risks for RES producers. Improvement is necessary for both the market-distorting price caps applied to the day-ahead, intraday, and balancing markets, and the methodology by which the NEURC revises these caps.<sup>6</sup>

Transposing the Electricity Integration Package (EIP) and establishing the legal basis for Distribution System Operators (DSOs) to attract flexibility services along with Transmission System Operator (TSO) to procure balancing services from renewable energy sources, will significantly increase RES participation and ensure its non-discriminatory integration into the market.

Further strengthening the national forward market will significantly facilitate renewable energy integration. This requires implementing standardised product trading, particularly via bilateral contracts, and developing robust forward hedging instruments, especially the long-term forward products foreseen by the EIP, to provide effective means of mitigating financial risks from price fluctuations.

A clear compensation framework for curtailment would significantly benefit producers by protecting them from non-market-based output reductions, thereby enhance revenue certainty and bolster overall investor confidence in the CfD model. Consequently, non-market-based redispatching should be reserved for specific conditions, such as the absence of market alternatives or when congestion is predictable and requires specific action.

Without these changes, any support scheme will remain financially unstable and unattractive to investors.

Additionally, the Draft Law No.13219 proposes to revise the mandatory technology-specific quotas for auctions. The minimum share for each renewable energy source—solar, wind, and others like biomass or small hydro—would be reduced from 10% to 5%, giving the Ministry of Energy more flexibility in setting support volumes. A new requirement would also be introduced to reserve 10% of the quota specifically for solar and decentralized renewable projects combined with BESSs.

A new financial guarantee mechanism is being proposed to further support the implementation of renewable energy projects. In addition to traditional bank guarantees, project developers would be allowed to provide direct financial security (by directly depositing funds into an escrow account instead of using a bank guarantee) to the Guaranteed Buyer.

Financial burdens on auction participants would also be eased. The amount of the bank guarantee required before signing a contract would be reduced from €15 to €10 per kilowatt of capacity. In case of

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<sup>6</sup> Detailed recommendations could be found in the [Assessment Note 06/2024](#)

construction delays or late commissioning, the follow-up guarantee would also drop significantly, from €30 to €10 per kilowatt.

Finally, the government intends to permit energy storage systems to connect via the cable pooling mechanism. This would enable storage and generation facilities to share a single grid connection, thereby optimising infrastructure utilisation and enhancing system flexibility.

### 3. Compliance assessment

#### 3.1. Scope

This legal compliance assessment considers how the Draft Law No.13219<sup>7</sup> will affect Ukraine's compliance with its obligation under Energy Community law to transpose the relevant provisions of Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources, as adapted and adopted in the Energy Community<sup>8</sup> ("RED II"). It focuses on five main provisions of the Draft Law No.13219, from those listed in the Explanatory Note, where the subject-matter could potentially raise issues of compliance with Ukraine's obligation to transpose RED II, namely the provisions concerning the:

- grant of support through a market premium mechanism;
- holding of renewable energy auctions until December 2034;
- maximum share of annual support quota per economic entity;
- minimum shares of annual support quota for specific technologies; and
- alternative guarantee instrument for auction participation.

#### 3.2. Observations and disclaimers

This is not an exhaustive assessment of all the amendments made by the Draft Law No.13219, nor an exhaustive assessment of whether Ukraine has fully transposed RED II.

In conducting the assessment of the Draft Law No.13219, the Secretariat has referred only to the Ukrainian legislation listed below as the legislation expressly referred to in the Draft Law as being amended thereby, assuming that the version of such legislation as obtained from the website of the Verkhovna Rada of Ukraine (<https://zakon.rada.gov.ua/>) on or around 27 May 2025 is up-to-date.

Ukrainian Legislation
Law on Alternative Energy Sources (Law N° 555-IV dated 20.02.2023, last update 09.02.2025)
Law on Electricity Market (Law N° 2019-VIII dated 13.04.2017, last update 09.04.2025)
Law on the National Commission for State Regulation in the Energy and Utilities Sectors (Law N° 1540-VIII dated 22.09.2016, last update 09.02.2025)

The Secretariat has translated the Ukrainian legislation, the Draft Law No.13219, the Comparison Table, the Explanatory Note and presentation slides of the Ministry of Energy of Ukraine entitled Improving "green" auctions: analysis of RF No. 13219 (dated April 28, 2025 and presented during a meeting on 28 May 2025) into English using Google Translate.

<sup>7</sup> Draft law No.13219 on amendments to certain laws of Ukraine regarding the improvement of competitive conditions production electric energy with alternative energy sources.

<sup>8</sup> Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources, adapted and adopted by the Decision of the Ministerial Council of the Energy Community 2021/14/MC-EnC of 30 November 2021. Ministerial Council Decision 2022/02/MC-EnC of 15 December 2022 amended Decision 2021/14/MC-EnC in order to reflect the targets provided therein.

The Secretariat has interpreted the provisions of the Draft Law No.13219 in accordance with their literal meaning, in English language, and has not considered the interpretation of such provisions in Ukrainian language or interpreted such provisions in accordance with Ukrainian law.

The Secretariat's comments in this legal compliance assessment shall be without prejudice to the exercise by the Secretariat of its powers and obligations under the Treaty.

### 3.3. Detailed legal compliance assessment

#### 3.3.1. Grant of support through market premium mechanism

##### **Energy Community acquis (RED II)**

Under Article 4(1)-(3) of RED II, a Contracting Party may apply support schemes in order to reach or exceed its national renewable energy target. Support schemes for electricity from renewable sources shall provide incentives in a market-based and market-responsive way, while avoiding unnecessary distortions of electricity markets as well as taking into account possible system integration costs and grid stability.

Furthermore, the support schemes shall be designed so as to maximise the integration of electricity from renewable sources in the electricity market and to ensure that renewable energy producers are responding to market price signals and maximise their market revenues. *"To that end, with regard to direct price support schemes, support shall be granted in the form of a market premium, which could be, inter alia, sliding or fixed."*

In the context of the European Union, Recital 16 of RED II explains the rationale of these provisions: *"Support schemes for electricity from renewable sources or 'renewable electricity' have been demonstrated to be an effective way of fostering deployment of renewable electricity. If and when Member States decide to implement support schemes, such support should be provided in a form that is as non-distortive as possible for the functioning of electricity markets. To that end, an increasing number of Member States allocate support in a form by means of which support is granted in addition to market revenues and introduce market-based systems to determine the necessary level of support."*

Recital 19 further states that *"Electricity from renewable sources should be deployed at the lowest possible cost to consumers and taxpayers. When designing support schemes and when allocating support, Member States should seek to minimise the overall system cost of deployment along the decarbonisation pathway towards the objective of a low-carbon economy by the year 2050."*

On this basis, although RED II does not specify the type of "market premium" mechanism that a Contracting Party may adopt, the choice of such mechanism shall still be governed by the principles of avoiding unnecessary market distortions and minimising the overall cost of the system for consumers and taxpayers.

##### **Draft Law No.13219**

The Draft Law No.13219 inserts into the definition of auction for the allocation of support quotas, as provided in Article 1 of the Law on Alternative Energy Sources a reference that the support quotas operate "under the market premium mechanism". The Law on Alternative Energy Sources already contained various provisions regarding the market premium mechanism, including the definition that it is a system for stimulating the production of electricity from alternative energy sources, under which the Guaranteed Buyer pays to business entities that have acquired the right to support based on the auction results, the difference between the amount of the auction and the calculated market price.

The Explanatory Note states that this amendment “introduces a support mechanism for winners of auctions for the allocation of renewable energy support quotas in the form of a “pure” premium instead of contracts for difference for the period until 31 December 2029”.

The presentation slides of the Ministry of Energy of Ukraine entitled Improving “green” auctions: analysis of Draft Law No. 13219 (dated April 28, 2025 and presented during a meeting on 28 May 2025) thus explain the difference between the two mechanisms in the Ukrainian context: “Unlike the pure “Market Premium”, the “Contracts for Difference” mechanism provides that the electricity producer - the winner of the auction returns to the Guaranteed Buyer funds in the form of a positive difference between the calculated market price for electricity and the price at which it won the auction. Under the current and forecast price environment (>10 euro cents/kWh), as well as - the marginal auction prices (<=8 euro cents/kWh), this means that the winners of the auctions will incur losses in the absolute majority of the time compared to normal market conditions.”

### Assessment

It appears from the statements above that the main change envisaged through the so-called “pure” market premium mechanism, which will be presumably further detailed in amended secondary legislation, is that, in cases where the calculated market price is above the awarded market price, then the beneficiaries of such mechanism would not have the obligation to pay that difference to the Guaranteed Buyer, as is usually the case in contract for difference mechanism.

Although RED II permits various premium schemes, the introduction of such “pure” market premium mechanism could potentially increase the distortions to the operation of the electricity market and/or the overall cost, for consumers and/or taxpayers, of the support provided. In such case of increase in distortions and/or costs, then the change complies with relevant RED II provisions, including the principles highlighted above, only if, considering all aspects of the current situation of the Ukrainian electricity market, such distortions and additional costs are necessary.

3.3.2. Provision that renewable energy auctions will be held until December 2034

### Energy Community acquis (RED II)

Pursuant to Article 4(4) of RED II, Contracting Parties shall ensure that support for electricity from renewable sources, with the exception of small-scale installations and demonstration projects, is granted in an open, transparent, competitive, non-discriminatory and cost-effective manner. Thus, while a Contracting Party is not under an obligation to apply support schemes for electricity from renewable sources<sup>9</sup>, Article 4(4) requires that such support, if and when granted, would require a competitive process.

### Draft Law No.13219

The Draft Law No.13219 amends part 15 of article 93 of the Law on Alternative Energy Sources to provide that auctions will be held until 31 December 2034 (instead of 2029).

### Assessment

This extended period during which auctions will be conducted is compliant with the principle provided in Article 4(4) of RED II.

3.3.3. Maximum share of annual support quota per economic entity

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<sup>9</sup> Article 4(1) of RED II provides that Contracting Parties may apply support schemes

### Energy Community acquis (RED II)

As mentioned above, under Article 4(4) of RED II, Contracting Parties shall ensure that support for electricity from renewable sources is granted in an open, transparent, competitive, non-discriminatory and cost-effective manner. Under Article 4(6)(a) of RED II, Contracting Parties shall, in order to ensure a high project realisation rate, establish and publish non-discriminatory and transparent criteria to qualify for the tendering procedure and set clear dates and rules for delivery of the project.

### Draft Law No.13219

Through the amendments to part 25 and paragraph 6 of part 30 of article 93 of the Law on Alternative Energy Sources, the Draft Law No.13219 limits to 50 per cent the share of support quotas for each year (comprising both the support quotas scheduled annually and the additional support quotas) that a business entity may obtain independently or together with other business entities with which it has a common ultimate beneficial owner.

### Assessment

Although the documents consulted do not explain the policy objective underlying this amendment, such limitation is usually established in order to prevent the renewable energy auctions from being captured by a limited number of developers and thus fosters the development of a broad-based renewables sector. In its recent Recommendation on auction design for renewable energy<sup>10</sup>, the European Commission has emphasised that the situation and particularly the maturity of the specific market should be taken into consideration for the purposes of auction design.

Therefore, on the basis that the current situation of the renewable energy market in Ukraine would require the 50% limitation, such limitation would be compliant with Articles 4(4) and 4(6)(a) of RED II.

#### 3.3.4. Minimum shares of support quota for specific technologies

### Energy Community acquis (RED II)

As mentioned above, Article 4(4) of RED II requires Contracting Parties to ensure that support for electricity from renewable sources is granted in an open, transparent, competitive, non-discriminatory and cost-effective manner. Furthermore, the situation and particularly the maturity of the specific market should be taken into consideration for the purposes of auction design.

### Draft Law No.13219

The Draft Law No.13219 makes various amendments to part 8 of article 93 of the Law on Alternative Energy Sources to provide for minimum shares of support quotas for each year (comprising both the support quotas scheduled annually and the additional support quotas) for specific technologies, for example:

- for solar power projects, the minimum share shall be 5% (as compared with 10% previously);
- for solar power and energy storage installations, the minimum share shall be 10% (no minimum share provided previously);
- for wind power projects, the minimum share shall be 5% (as compared with 10% previously).

### Assessment

Although the documents consulted do not explain the policy objective underlying this amendment, such minimum shares are usually adopted in order to favour specific technologies, taking into consideration

<sup>10</sup> COMMISSION RECOMMENDATION of 13.5.2024 on auction design for renewable energy Brussels, 13.5.2024 C(2024) 2650 final.

various factors including the time required for developing and constructing the projects with such technology, the costs of such technology, and the impact of such technology on the stability of the electricity grid.

On the basis that the current situation of the renewable energy market in Ukraine and the economic and technical parameters of the technologies concerned would require the minimum shares envisaged, these would be compliant with Articles 4(4) and 4(6)(a) of RED II. The continued compliance of these minimum shares will depend on developments regarding the renewable energy market and the technologies concerned.

### 3.3.5. Alternative guarantee instrument for participation in the auction

#### Energy Community acquis (RED II)

As mentioned above, Article 4(4) of RED II establishes the principle that support for electricity from renewable sources shall be granted in an open, transparent, competitive, non-discriminatory and cost-effective manner. Article 4(6)(a) of RED II provides for the objective of achieving a high project realisation rate for the awarded projects.

The provision of security for a bid participating in renewable energy auctions is usually resorted to in order to ensure the seriousness of the bid, with a view to achieving a high project realisation rate as a result of the auction. As the European Commission noted in its recent Guidance on renewable energy auctions<sup>11</sup>: *“Most EU countries using auctions for renewable energy require financial guarantees in the form of bid and performance bond as financial pre-qualification requirement. Bidders will not get back their bond unless they comply with the contract. In many countries these guarantees are returned as milestones are met.”*

#### Draft Law No.13219

The Draft Law No.13219 amends part 17 of article 93 of the Law on Alternative Energy Sources to provide for alternative guarantee instruments (other than the unconditional and irrevocable bank guarantee) which business entities may provide to satisfy the mandatory requirement for participating in the auction: the deposit of funds to a separate current account of the Guaranteed Buyer or an escrow account opened by the auction participant in any of the banks specified by the Guaranteed Buyer.

#### Assessment

In principle, the provision for these two alternative guarantee instruments (the bank deposit and the escrow arrangement) for the purposes of the Ukrainian renewable energy auctions, as envisaged in the Draft Law No.13219, is compliant with Article 4(4) of RED II. However, this is subject to the condition that there is no adverse effect on the competition between bids in the auction process. In other words, this requires that, as compared with the unconditional and irrevocable bank guarantee that a bidder can submit under the current version of the legislation, the alternative guarantee instruments (the bank deposit and the escrow arrangement) provide substantially equivalent powers to the Guaranteed Buyer in case the bidder breaches its obligations under the bid documentation. This depends on the terms and conditions of the guarantee instruments as well as the legal and regulatory framework applicable to them under Ukrainian law and for each of the guarantee instruments it would concern aspects such as the administrative or judicial proceedings that the Guaranteed Buyer would need to pursue in order to enforce the guarantee and objections that the bidder or the issuer of guarantee could oppose to such enforcement.

<sup>11</sup> COMMISSION STAFF WORKING DOCUMENT Guidance to Member States on auction design for renewable energy, SWD(2024) 300 final, 13.5.2024, section 11.

#### 4. Conclusions and recommendations

The proposed amendments by the Draft Law No.13219, particularly the introduction of the “pure” market premium mechanism, would be assessed as compliant with the relevant provisions of RED II only if potential increases in the distortions to the operation of the electricity market and/or the overall cost, for consumers and/or taxpayers, of the support provided are assessed as necessary, considering all aspects of the current situation of the Ukrainian electricity market.

It is therefore advisable to conduct an assessment of potential distortions to the functioning of the electricity market, as well as on the overall cost, for consumers and/or taxpayers, of the support provided.

The core element proposed in the Draft Law No.13219 is to replace the current auction scheme for CfD with a so-called ‘pure’ market premium mechanism (one-sided sliding premium) for auction winners. This arrangement is presumably designed to make the support scheme more attractive to producers while providing predictability and revenue stability. However, while this mechanism may yield some positive outcomes, it does not address the broader concerns potential investors have regarding systemic issues in the Ukrainian electricity market. To restore investor confidence, the renewable energy surcharge must be separated from the electricity transmission tariff and transparently funded through a dedicated levy. At the same time, NEURC must reform its tariff-setting methodology to fully reflect the actual costs of the surcharge, strictly enforce payment discipline across the supply chain, and ensure a credible mechanism for repaying existing debts. Another critical challenge is improving market functioning and transparency to ensure a reliable reference price, while simultaneously addressing curtailment and balancing issues that currently hinder the effective integration of renewable energy into the grid and drive-up operational costs.

Therefore, prior to considering the introduction of a new scheme, the Secretariat strongly recommends proceeding with the finalisation, adoption, and implementation of the two Roadmaps: the Roadmap for the support of Renewable Electricity Sector in Ukraine, which addresses several market issues including curtailment and balancing, as well as the Roadmap of the process of separating the renewable energy surcharge from the electricity transmission services tariff<sup>12</sup>, as the way forward to the successful implementation of renewable energy auctions in Ukraine.

Furthermore, responsible Ukrainian stakeholders should prioritise the swift transposition and implementation of the Electricity Integration Package, as it is expected to strengthen the national legal framework and improve market conditions for the integration of renewable energy.

The other changes proposed in the Draft Law No. 13219 are more technical in nature; they are necessary and are expected to alleviate market challenges.

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<sup>12</sup> CMU Resolution No.612-r of 25.06.2025 “On approval of the Roadmap for the separation of the renewable energy surcharge from the tariff for electricity transmission services and the action plan for the implementation of the Roadmap for the separation of the renewable energy surcharge from the tariff for electricity transmission services for 2025 and 2026”, <https://zakon.rada.gov.ua/laws/show/612-2025-%D1%80#n64>