Part III.8 - Supplementary Information Sheet for the notification of an evaluation plan

Member States must use this sheet for the notification of an evaluation plan pursuant to Article 1 (2) (a) of Regulation (EU) No 651/2014¹ and in the case of a notified aid scheme subject to an evaluation as provided in the relevant Commission guidelines.

Please refer to the Commission Staff Working Document "Common methodology for State aid evaluation" for guidance on the drafting of an evaluation plan.

1. Identification of the aid scheme to be evaluated

(1) Title of the aid scheme:

Forward supply system of electricity storage capacity

- (2) Does the evaluation plan concern:
 - (a) a scheme subject to evaluation pursuant to Article 1 (2) (a) of Regulation (EU) No 651/2014?
 - (b) \(\sum \) a scheme notified to the Commission pursuant to Article 108 (3) TFEU?
- (3) Reference of the scheme (to be completed by the Commission):
- (4) Please list any existing *ex-ante* evaluations or impact assessments for the aid scheme and ex-post evaluations or studies conducted in the past on predecessors of the aid scheme or on specific schemes. For each of these studies, please provide the following information: (a) a brief description of the students' objections, methodologies used, results and conclusions, and (b) specific challenges that the assessments and studies have been produced from a methodological point of view, for example data availability that are relevant for the assessment of the current evaluation plan. If appropriate, please identify relevant areas or features not covered by previous evaluation plans that should be the subject of the current evaluation. Please provide the assumptions of such assessments and studies in annex and, when available, the internet links to the relevant documents:

Commission Regulation (EU) No 651/2014 of 17 June 2014 Declaring certain categories of aid compatible with the ⁱ nternal market in application of Articles 107 and 108 of the Treaty (OJ L 187, 26.6.2014, p. 1).

² SWD (2014)179 final of 28.5.2014.

2. Objectives of the aid scheme to be assessed³

2.1.Please provide a description of the aid scheme Specifying the needs and problems the scheme intends to address and the intended categories of beneficiaries, for example size, sectors, location, indicative number:

Italy's integrated national energy and climate plan (INECP), which is currently being updated also to take account of the new and more ambitious decarbonisation targets for 2030 resulting from the 'Fit for 55' plan, has identified the needs of the electricity system in order to meet the national targets for the penetration of electricity from renewable energy sources up to 65 % of electricity consumption by 2030. The underlying analyses have shown that, in the absence of appropriate measures, there is a high risk that growing production from non-programmable renewable sources cannot be fully dispatched during the hours of their greatest production, with overgeneration concentrated in particular in the southern and island parts of the country with the highest expected penetration of production from non-programmable renewable sources (FRNPs), which could amount to between 6 and 20 TWh/year, seriously affecting the economy of the system and undermining the achievement of national targets for the penetration of final consumption by renewable sources.

One of the measures needed to meet these needs is the development of centralised storage systems (i.e. not serving the needs of specific production facilities) covered by this measure, in a manner consistent with the expected development of distributed storage capacity and as part of further measures to support the objective of integrating the massive growth of generation from renewable sources, including the development of transmission and distribution networks and an evolution of the functioning of the market for dispatching services with a view to greater participation of demand response, storage systems and the same generation from renewable sources.

In the absence of a specific measure, there are no conditions for the massive and timely development of these resources to a sufficient extent to limit the risk of overgeneration and, consequently, of non-dispatching of growing generation from renewable sources.

The beneficiaries of the measure are undertakings, irrespective of size and sector to which they belong, that intend to build new electricity storage capacity meeting the performance requirements that will be pre-defined during the procurement procedure, to be located in the areas where the procurement procedure will be organised according to the actual development at local level of renewable generation and grid infrastructure and storage needs that will be determined accordingly.

Beyond providing a general description of the objections and eligibility rules of the scheme, the aim of this section is to assess how the eligibility and exclusion rules of the scheme may be used to preserve the effect of aid. In some cases, the precise eligibility rules may not be known in advance. In these cases the best available expectations should be provided.

2.2.Please indicate the objections of the scheme and the expected impact, at the level of the intended beneficiaries and as far as the objective of common interest concerned:

The uncertain revenues of the spot electricity markets, including those of the dispatching services market, do not allow the massive and timely development of new electricity storage capacity given the level of risk associated with such investments.

Itshould be borne in mind that the level of risk is very high, as these are resources: (I) characterised by high fixed costs; and above all (ii) whose value depends on exogenous variables not foreseeable by the investor (network development, renewable power park module development, etc.).

It is therefore considered necessary to complement the market design with longterm contractualisation tools that make the flow of revenue to cover the necessary investments stable for investors in the medium to long term.

In terms of positive effects for the achievement of the objectives of common interest, the forward supply system of new electricity storage capacity will also enable:

- achieving effective coordination between developments in renewable energy, storage systems and grid infrastructure to maximise the dispatch of electricity from renewable sources, reducing the risk of overgeneration, thereby facilitating the achievement of the environmental targets set;
- promote efficient dispatching of installations on energy markets by increasing their competitiveness.
- **2.3.**Please indicate possible negative effects, on the aid beneficiaries or on the wider economy, that might be directly or indirectly associated with the aid scheme⁴:

Nothing to highlight

2.4. Please indicate (a) the annual budget planned under the scheme, (b) the intended

duration of the scheme⁵, (c) the aid instrument or instruments and (d) the eligible costs:

(5) The duration of the measure is indicatively 10 years. The actual duration will depend on the evolution of the system's needs in relation to new requirements and the objective of minimising overgeneration, starting with Terna's proposal, approved by the Ministry after consulting the Authority. The supply of new storage capacity will therefore be carried out according to a step-by-step approach, and each auction, broken down by territorial area, will take into account the results of the previous auction and the conditions of the electricity

Examples of negative effects are regional and sectoral biases or crowding out of private investments induced by the aid scheme.

Aid schemes defined in Article 1 (2) (a) of Regulation (EU) No 651/2014 are excluded from the scope of the Regulation six months after their entry into force. After having assessed the evaluation plan, the Commission may decide to extend the application of the Regulation to such schemes for a longer period. Member States are invaded to specify the intended duration of the scheme.

system in the specific areas, in particular in terms of network development, growth of generation from renewable sources in relation to loads and their impact, deployment of distributed storage systems. The purpose of the auction is the award of multi-year contracts (which will be defined before the auction on the basis of the useful life of the reference technologies of the auction) on the basis of which the beneficiary undertakes to make available to all market participants the new capacity realised against an annual premium for the entire delivery period. The premium awarded shall be the premium awarded at the end of the auction, taking into account the maximum bid values set by the Authority, the determination of which will take into account, in relation to the reference technologies, the investment costs, operating costs and a fair return on the capital invested. With reference to the annual budget for the entire duration of the measure, in view of the approach described above, it is difficult to estimate. In any event, forthe first tender, the total budget is estimated at a range of EUR 2-3,75 billion [note that this is what would be paid to the selected counterparties during the entire multiannual delivery period covered by the contracts awarded]. This value is obtained by assuming a storage capacity demand of between 10 and 15 GWh.

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2.5.Please provide a summary of the eligibility criteria and the methods for selecting the aid beneficiaries. In particular, please describe the following: (a) the methods used for selecting beneficiaries (e.g. such as scoring), (b) the indicative budget available for each group of beneficiaries, (c) the likelihood of the budget being exposed for certain groups of beneficiaries, (d) the scoring rules, if they are used in the scheme, (e) the aid intensity holdings and (f) the criteria the authority granting the aid will take into account when assessing applications:

The proposed measure provides for a procurement procedure based on competitive auctions, based on a framework prepared by Terna, taking into account the criteria and conditions laid down by ARERA.

Inparticular, Terna identifies the amount of resources (MW) needed for the system. Such needs shall be determined on the basis of a cost-benefit analysis taking into account the investment and operational costs of the storage technologies concerned, the amount and value of electricity at risk of overgeneration, as well as the cost of alternative options such as measures to remove grid constraints.

The required capacityshall be procured through auctions, in each market area/area, programmed according to a time progression taking into account in particular the expected development of renewable generation and the evolution of the high voltage grid. Before each auction, Terna identifies the technical economic parameters that reflect the system needs and that new capacity projects must meet, such as:

- (a) the planning horizon;
- (b) the delivery period;
- (c) the duration of storage;
- (D) the efficiency of storage and its degradation as a function of the time and/or number of charging and discharge cycles performed;
- (e) the maximum number of charging and discharge cycles;

- (f) the maximum time that can elapse between the time when the storage is loaded and the time within which it is to be discharged without incurring significant energy losses;
- (g) other relevant technical and economic parameters identified by Terna.

Auctions shall be open to all storage technologies; if the technologies concerned are significantly different in relation to one or more technical parameters defined by Terna, separate auctions shall be carried out for each technology.

The successful tenderers, in relation to the new capacity offered for which the authorisations provided for by the legislation in force exist, shall be selected, on the basis of the pay-as bid mechanism, on the basis of the price offered, expressed in Euro/MW/year or Euro/MWh/year.

For the purpose of conducting the auctions, ARERA shall publish the maximum values of the awards that may be offered, established on the basis of the capital and operational costs of the technologies concerned.

The successful tenderers sign a fixed-term contract (not less than 10 years) with Terna. The contract provides that:

Terna recognises the annual premium as a result of the auction;

- the selected capacity owner is obliged to:
- (I)make storage capacity available to market participants (e.g. producers from renewable sources) through a trading platform organised and operated by the Energy Markets Manager (GME) where standardised products based on time shifting options are allocated. Specifically, the time shift option allows the market participant to change the economic value of its injection/withdrawal programme resulting from trading on spot markets, moving it over time and obtaining in exchange the net value (positive or negative) resulting from that shift.
- (II) make available the 'residual' storage capacity on the ancillary services market, offering available resources taking into account predefined price limits.
- **2.6.**Please comment specific constraints or risks that might affect the implementation of the scheme, its expected impacts and the achievement of its objectives:

The measure, which is part of the INECP, serves to achieve the climate objectives, in particular the growth of renewable generation, by 2030. As investments with a high risk profile, delays in the implementation of the measure could jeopardise the development of investments to the extent necessary and, consequently, to compliance with the targets set. An additional element of attention is the efficiency of permit granting procedures for the construction and operation of new storage facilities; in this respect, the legislative framework in this area has been subject to several simplification and rationalisation measures with a view to reducing the time and risks of these procedures.

3. Evaluation questions

3.1. Please indicate the specific questions that the evaluation should address by providing quantitative evidence of the impact of aid. Please distinguish between (a) questions related to the direct impact of the aid on the beneficiaries, (b) questions related to the indirect impacts and (c) questions related to the proportionality and appropriation of the aid. Please explain how the evaluation questions related to the objections of the scheme:

The direct effects and appropriateness of the aid on the beneficiaries will be addressed by the following evaluation questions:

- a) To what extent has the measure achieved the expected effects?
- b) To what extent has the increased availability of electricity storage promoted an increased participation of renewable generation facilities in the energy and ancillary services markets?
- c) To what extent has the newly supplied storage capacity reduced the risk of overgeneration of renewable electricity?

The objective of the measure is to promote investments in new functional electricity storage capacity to the extent strictly necessary to reduce the risk of overgeneration from renewable sources, which would jeopardise their effective dispatch to the system and thus the achievement of energy and climate targets.

This objective shall be pursued through a competitive mechanism that supports investments to the extent necessary, both to contain the burden on the system and to ensure that new storage capacity is supplied taking into account the actual needs of different territorial areas in terms of concurrent network developments and expansion of generation capacity from renewable sources.

Indirect effects will be investigated through the following evaluation questions:

- a) To what extent has the development of electricity storage capacity affected employment?
- b) To what extent does the development of storage capacity have an impact on the valorisation of the natural environment (reservoirs, use of abandoned or brownfield areas, etc.)
- c)..... To what extent has the availability of increased electricity storage capacity contributed to the adequacy needs of the electricity system?
- d) What is the impact of the burden of the measure on consumers?

Indirect effects can be attributed to an assessment of the spill-over effects for the system as a whole in terms of economic growth and employment, thanks to new investments and the activation of local industrial services, as well as a greater contribution from the integration of renewable sources to both the adequacy of the electricity system, reducing the need for the supply of resources for this

purpose and respecting the natural environment, thanks to the reuse of areas and reservoirs, including for the sake of greater environmental sustainability. The impact on the bill of the burden of the measure is also one of the effects under assessment.

Theproportionality and adequacy of the measure in relation to its objectives is ensured by regular monitoring, carried out in accordance with the procedures and criteria laid down by the regulatory authority, with the aim of verifying the effectiveness of the measure. In that regard, it will also be assessed, before the subsequent competitive procedures are carried out, whether the measure is, in whole or in part, no longer necessary or insufficient to ensure effective competition in those procedures, also taking into account the articulation of supply quotas over time and space.

4. Result indicators

4.1. Please use the following table to describe which indicators will be built to measure outcomes of the scheme, as well as the relevant control variables, including the sources of data, and how each result indicator corresponds to the evaluation questions. In particular, please comment (a) the relevant evaluation question, (b) the indicator, (c) the source of data, (d) the frequency of collection of data (for example, annual, monthly, etc.), (e) the level at which the data is collected (for example, firm level, establishment level, regional level, etc.), (f) the population covered in the data source (for example, aid beneficiaries, non-beneficiaries, all firms, etc.):

Evaluation question	Indicator	Source	Frequency	Level	Population
has the measure achieved the expected effects?	expressing the capacity to support the investment Saturation of the requirements of the implementation procedures	Balance sheet data of the undertakings in the control group Results of the implementation procedures Regional/nationa I databases		Regional Local	Beneficiaries Similar undertakings Holders of authorisations/conc essions
	Number of market participants using storage capacity (broken down by	Outcomes of the organised wholesale	Annual	National	Wholesale electricity market

promoted an increased participation of renewable generation	territorial area) in the different markets (MGP/MI); Volumes of electricity covered by the programmes for the release/withdrawal of electricity storage facilities in the different markets (MGP/MI/MSD)	market			operators
	hours at zero price on the wholesale market	Outcomes of the organised wholesale market	Annual		Wholesale electricity market operators
development of	Overall increase in employment directly linked to the development and operation of new electricity storage facilities	Sector Statistics Analysis of trade associations	Annual	National	All farms
To what extent does the development of storage capacity have an impact on the valorisation of the natural environment (reservoirs, use of abandoned or brownfield areas, etc.)	Number of water basins used Number of brownfield sites reused/abandoned	Regional/nationa l databases	Annual	Regional	Beneficiaries Holders of authorisations/conc essions
	usefully considered for adequacy	Network Manager Adequacy Analysis	Annual	National	Beneficiaries
What is the impact of the burden of the measure on consumers?	relation to the total cost of the consumer bill, per category of consumer	Results of the implementation procedures Official statistics Monitoring reports of the	Annual	National	All electricity consumers

	Retail Price		
	Regulatory		
	Authority		
			i

Please explain why the indicators are the most relevant for measuring the expected impact of the scheme:

The choice of indicators is in line with Annex II of the Staff Working Document: "Common methodology for State aid assessment, 28.5.2014, SWD (2014) 179 final. The indicators aim to assess the effect of the aid on the scope of the measure which is:

- increased dispatch of renewable generation
- decarbonisation
- contribution to energy adequacy and security
- sustainable economic growth

5. Envised methods to conduct the evaluation

5.1. In light of the evaluation questions, please describe the encouraged methods to be used in the evaluation to identify the causal impact of the aid on the beneficiaries and to other indirect impacts. In particular, please explain the assumptions for promoting such methods and for objecting other methods (for example, estimates related to the design of the scheme)⁶:

Themain analyses to be carried out will aim to highlight the impact of the measure on certain economic and financial parameters of the undertakings under assessment, in particular those relating to the ability to cover the fixed and operational costs arising from the development and operation of electricity storage facilities. In particular, the beneficiary companies will be compared with a control group made up of any identical non-beneficiary companies. For the analysis, the use of methodologies based on counterfactual scenarios, such as difference in differences (did), regression discontinuity design (RDD), etc. will be considered.

Inany event, the specific characteristics of the measure raise some methodological issues that need to be taken into account when estimating the causal effect associated with the measure. On the basis of the evidence also provided by the number of existing permits for the development of new storage capacity where the construction phase is not yet followed, it seems implausible that this type of investment will be carried out without the support provided by the measure in question. Therefore, the possibility of creating a meaningful control group for an effective assessment of the

Please make reference to SWD (2014)179 final of 28.5.2014.

measure, based mainly on the establishment of non-beneficiary applicants but still willing to continue with the investment decision, could be highly conditioned.

The evaluationwill include statistical simulations that will allow testing of the main assumptions underlying the model of the measure. Additional dimensions, such as the size of the enterprises and the geographical area, will be taken into account for the inconsistency of the treatment and control groups. The analysis will be accompanied by descriptive statistics from administrative and survey data (aggregated where necessary at sector/region level) to support the evidence.

In terms of effects, the effectiveness of the measure in relation to the potential electricity storage capacity expressed by the permits granted and the projects submitted will be assessed.

Direct and indirecteffects, additionality and proportionality will be studied through indicators developed with data collected mainly from aid beneficiaries, at the time of the aid application and then annually during the management of the aid scheme (e.g. technical information on plant power, energy handled by installations, investments, operating costs, etc.). Secondly, any other useful data may also be collected through surveys targeting, for example, trade associations, public authorities' databases and regular analyses of energy markets of entities such as Terna, GME and GSE.

The employment impact will be assessed on the basis of data that beneficiaries will be able to provide on the number of jobs dependent on the investments that have been possible thanks to the measure.

The impact of the aid on the consumer's energy bill will be assessed using a specific methodology to analyse the evolution of the energy bill costs, with particular reference to the costs invoiced in bills to cover the charges provided for in the measure, before and after the entry into force of the measure.

- **5.2.** Please describe precisely the identification strategy for the evaluation of the cause impact of the aid and the assumptions on which the strategy applies. Please describe in detail the composition and the significance of the control group:
 - Aspointed out in point 5.1, the definition of a significant control group must take into account the specificities of the measure in question and the investments covered by it.
- **5.3.** Please explain how the encouraged methods address potential selection bias. Can it be filled with sufficient certainty that differences in the outcomes for the aid beneficiaries are two to the aid?
 - See point 5.2. With regard to the effect of the aid on the results of the beneficiary, reference may be made to the monitoring over time of the number of authorisations issued for which an investment decision is followed or not followed in the absence of aid (non-beneficiaries).

5.4. If relevant, please explain how the encouraged methods intended to address specific challenges related to complex schemes, for example schemes that are implemented in a deferred manner at regional level and schemes that use strict aid instruments:

Monitoring the effectiveness of the measure will allow analysis at different levels, drawing on different databases. For example, it will be possible to verify its adequacy at national, sub-national or regional level.

6. Date collection

6.1. Please provide information on the mechanisms and sources for collecting and processing data about the aid beneficiaries and about the extended counterparts. Please provide a description of all the relevant information that relates to the selection phase: data collected on aid applications, data submitted by applicants and selection outcomes. Please also explain any potential issue as regards data availability:

The datawill be collected mainly from the beneficiaries of the aid, Terna, the GME, at the time of the aid application and then annually during the management of the measure (e.g.: technical information on RES plants, energy produced, investments, operating costs, amount of raw material used, etc.). Secondly, any other useful data may also be collected through surveys, for example, addressed to trade associations, in particular those required for indicators on indirect effects. The data collection process from aid beneficiaries will be managed on the basis of their obligation to provide data for the management and monitoring of the mechanism. Obviously, the data collected will be subject to the appropriate aggregated statistical analyses; data provided by the National Statistical Institute (ISTAT) (i.e. national accounts data) will also be used, with particular reference to data on the impact on economic growth and employment. For specific analyses of the impact of the measure on the energy and services markets, the Energy Services Manager – GSE S.p.A. and its subsidiary Research on the Energy System – RSE S.p.A. will also be involved.

6.2. Please provide information on the frequency of the data collection relevant for the evaluation. Are observations available on a sufficiently disaggregated level, that is to say at the level of individual undertakings?

Data on the beneficiaries of the aid will be collected from the stage of access to the measure and thereafter annually during the management of the measure. Data on the indirect effects on the economy, the electricity system and the electrian energy and services markets will be collected annually in accordance with the monitoring requirements for the measure to be defined by the regulatory authority.

Please note that the evaluation might requires sourcing of both historical data and data that will be progressively available during the deployment of the aid scheme. Please identify the sources for both types of information. Types of data should preferably be collected from the same source as to guarantee stocks across time.

6.3. Please indicate the access to the necessary data for conducting the evaluation might be impaired by laws and regulations governing confidentiality of data and how those issues would be addressed. Please address other possible challenges related to data collection and how they would be overtaken:

Datawill be collected and processed, in compliance with data management legislation (GDPR legislation, purposes of data processing, statistical rules where applicable, etc.) .). Relevant information will be made publicly available to all interested parties before the auctions take place.

6.4. Please indicate where aid beneficiaries or other undertakings are foreseen and why complementary sources of information are intended to be used:

In addition to the analysis of the data that beneficiaries are required to provide at the stage of access to the measure and subsequently during the contract management phase, any other data useful for the evaluation may also be collected through surveys and questionnaires, for example, addressed to trade associations.

7. Proposed timeline of the evaluation

7.1. Please indicate the proposed timeline of the evaluation, including milestones for data collection, interim reports and engagement of stakeholders. If relevant, please provide an annex detailing the proposed timeline:

Data not already available from the beneficiaries will be collected at the time of the application for access to the measure and annually thereafter. Data from the control groups will also be collected annually.

7.2. Please indicate the date by which the final evaluation report will be submitted to the Commission:

The assessment will be submitted as required in Annex C (2021) 9817 final, within nine months before the expiry of the measure.

7.3. Please comment factors that might affect the envisaged timeline:

While the data collection system will be partly mandatory and none the less efficiently designed, the factor that could possibly lead to slippages in the timing of the assessments is the timely availability of data, in particular with regard to data relating to the control group.

8. The body conducting the evaluation

8.1. Please provide specific information on the body conducting the evaluation or, if not yet selected, on the timeline, procedures and criteria for its selection:

The assessment will be carried out by an independent body (or consultant) selected by MASE on the basis of the criteria that will be listed in the Decree implementing the measure.

8.2. Please provide information on the independence of the body conducting the evaluation and on how possible conflict of interest will be resolved during the selection process:

The evaluation body will be selected on the basis of criteria that reflect the requirements of independence and absence of conflict of interest with the beneficiary and the Ministry, as well as experience on the evaluation of public projects and interventions.

8.3. Please indicate the relevant experience and skills of the body conducting the evaluation or how those skills will be acquired during the selection process:

See elements 8.2

8.4. Please indicate which arrangements the granting authority will make to manage and monitor the conduct of the evaluation:

In the decree defining the procedure for selecting and entrusting the assessment body, a specific reporting methodology will be defined, including with reference to the frequency of the assessment of the indicators provided for.

8.5. Please provide information, even if only of an indicative nature, on the necessary human and financial resources that will be made available for caring out the evaluation:

The decree implementing the measure referred to in point 8.1 will define the financial and material resources that will be made available to carry out the evaluation assignment. As indicated above, technical support from GSE and RSE will be possible for the collection/analysis of the necessary data due to the established experience in the areas of interest.

9. Publication of the evaluation

9.1. Please provide information on the way the evaluation will be made public, that is to say, through the publication of the evaluation plan and the final evaluation report on a website:

the evaluation plan and evaluation reports will be published on the Ministry's website.

9.2. Please indicate how the involvement of stakeholders will be confirmed. Please indicate why the organisation of public consultations or events related to the evaluation is covered:

The involvement of the various stakeholders is fully ensured, given that:

- actual and potentialbeneficiaries will be required to provide the necessary data for the purposes of the evaluation plan; they will therefore be fully informed about their purpose and how they are used (see Chapter 6);
- the data collected and its analysis will be made public, while respecting sensitive information;
- the evaluation reports (interim and final) will be subject to a public consultation.
- **9.3.** Please specify how the evaluation results are intended to be used by the granting authority and other bodies, for example for the design of Successors of the scheme or for specific schemes:
 - Asstated above, the measure will be implemented according to a gradual scheduling of auctions and quotas to be supplied, so as to take account of the results of previous auctions and the existence of the evaluation provided for in the plan in question. The results of the assessments will serve to analyse any need to update the measure or to define similar measures.
- **9.4.** Please indicate where and under which conditions data collected for the purpose or used for the evaluation will be made accessible for further studies and analysis:
 - The data collected and the analyses carried out on them may be made available for study and subsequent processing in accordance with the legislation in force on the protection of sensitive data and after obtaining the opinions/authorisations of the parties concerned.
- **9.5.** Please indicate why the evaluation plan contains confidential information that should not be closed by the Commission:

There is no confidential information

10. Other information

10.1. Please indicate here any other information you consider relevant for the assessment of the evaluation plan:

Nothing to report

10.2. Please list all documents attached to the notification and provide paper copies or direct internet links to the documents concerned: