

Brussels, 26 November 2014

Related documents: CC 506

DECISION OF THE ENERGY CHARTER CONFERENCE

Subject: Adoption of the Energy Charter Secretariat's Work Programme for 2015

The Energy Charter Conference at its 25th Meeting on 26th of November 2014 **adopted** the Energy Charter Secretariat's Work Programme for 2015 as proposed in document CC 506 (attached hereto) and with the comments made by delegations.

DETAILED ACTIVITY SCHEDULE 2015¹

POLICY AREA A: INVESTMENT PROMOTION AND PROTECTION; DISPUTE SETTLEMENT [FORMER ACTIVITY AREA D]

A.1	Investment Climate and Market Structure (ICMS) Country Reviews in the Energy Sector [ECT Article 10(9)], former activity D.1	
	<i>Outputs:</i>	<i>Timing:</i>
(i)	Overall and comprehensive assessment of the ICMS In-Depth Reviews in the Energy Sector	Q1-2
(ii)	ICMS In-Depth Review of Latvia	Q 1-2
(iii)	Follow-up ICMS In-Depth Review in the Energy Sector of the Republic of Tajikistan	Q 3-4
(iv)	ICMS In-Depth Review of Indonesia ²	Q 3-4
	<i>Unit(s) responsible:</i> Directorate and AF	<i>Estimated staff-months:</i> Established Staff 9 Short Term Staff 3

Under the Review under Article 34(7) the Investment Group is requested to deliver an overall and comprehensive assessment of the content, process, objectives and targets of the ICMS country reviews. The Secretariat will facilitate the assessment and continue preparation of ICMS in-depth reviews in the energy sector of the interested members and of those observer countries like Indonesia that have the intention to accede to the Energy Charter Treaty. The reviews will be subject to the peer-review by two Contracting Parties and concluding policy recommendations will be submitted for adopted by the Energy Charter Conference. Dissemination of the ICMS country reviews will be facilitated through special events in the relevant countries and/or in Brussels. The Investment Group will monitor the implementation of the recommendations contained in past ICMS country reviews.

¹ According to the Conclusions of the Review under Article 34 (7), the Programme of Work will follow the order of priorities set out in the Conclusions on the basis of available resources.

² Subject to the availability of established staff

A.2	Investment Promotion/Protection and Dispute Settlement under the ECT [ECT part III, Art.26] (former Activities D.2, D.5, D.3, F.3, F.4)	
	<p><i>Outputs:</i></p> <ul style="list-style-type: none"> (i) Proposals for improving the investment dispute settlement mechanism: transparency, ombudsman and mediation/conciliation (ii) Comprehensive review of the Blue Book in accordance with the Modernisation Road Map (iii) Monitor the debates on investment protection, including legal issues regarding low-carbon investments (iv) Summaries of arbitral awards (v) Occasional papers by research fellows on international and comparative energy investment law, economics and policy (vi) Support to the Investment Group and to the Industry Advisory Panel [CC 448, ECT Article 9(3), PEEREA Article 3(6)] (former activity F3) (vii) Side event on international energy disputes during the Ad Hoc High Level Conference on the International Energy Charter (new Activity) 	<p><i>Timing:</i></p> <p>2015</p>
	<p><i>Unit(s) responsible:</i> Directorate, SG, DSG and AF</p>	<p><i>Estimated staff-months:</i></p> <p>Established Staff 23.5</p> <p>Short Term Staff 5</p>

(i) Based on the proposal by the Chairman (Kazakhstan) and on the conclusions of the Review, the members support consideration of suggestions for the improvement of the investment dispute settlement mechanism. The Secretariat will complete reports on transparency and alternative dispute settlement mechanisms (ombudsman, conciliation and mediation) and will develop further proposals for e considerations by the constituency. The Secretariat will draft proposals for the establishment of an ombudsman and/or a body of experts in investment mediation/conciliation and of pre-defined rules for the settlement of investment disputes.

(ii) The Secretariat maintains the “Blue Book” (i.e. non-conforming measures of Contracting Parties/Signatories in the pre-establishment phase of an investment) as a means of enhancing transparency concerning existing country specific exceptions to the principle of non-discrimination with the overall aim of reducing the exceptions. The Secretariat launched the comprehensive review of the Blue Book in 2014 by means of a questionnaire circulated to all Contracting Parties and Signatories with a request to review existing exceptions and report on any new exceptions. The

Investment Group will discuss the results of the comprehensive review and formulate policy recommendations for endorsement by the Charter Conference in 2015.

- (iii) According to the conclusions of the Review, the Investment Group will monitor the debates on investment protection, including legal issues regarding low-carbon investments, that take place within major organisations and discuss with the relevant experts which provisions of investment protection and dispute settlement could be improved and require further consideration by the Conference.
- (iv) Based on recommendations in the Review under Article 34(7) to promote awareness on the Energy Charter Treaty and in particular of the investment dispute settlement system, and following up the summaries of arbitral awards prepared in 2014, the Secretariat will continue drafting summaries of the arbitral disputes under the ECT which will be published in 2015.
- (v) As part of the assessment on the effectiveness of the Energy Charter Treaty provisions on investment promotion and protection, and based on recommendations in the review under Article 34(7) to promote awareness on the ECT and its implementation, research fellows under the supervision of the Secretariat will publish occasional papers on topics of current interest and debate in the international investment community. Such topics may include: the value of multilateralism in establishing market confidence and regulatory stability in the energy sector; sustainable development in relation to international energy investments.
- (vi) The Investment Group is the body responsible for discussion on investment issues of the Energy Charter. Investment matters to be submitted to the Conference are discussed in the Group. The Secretariat will continue to support the activities of the Group in 2014. One of the topics identified in the last meeting of the Investment Group was to clarify the different options for the exercise of the denial of benefits clause under Article 17 ECT.

The objective of the Industry Advisory Panel (IAP) is to promote dialogue between the energy industry and the Contracting Parties and the observer states. The Secretariat will continue involving IAP members in promoting the Energy Charter at public events and in the framework of the Energy Charter Knowledge Centre. In the Article 34(7) Review, members recommended strengthening of the profile of the IAP. It is therefore planned to have the first IAP meeting of 2015 in Egypt, second in China and the final meeting in Brussels. The Secretariat will continue an annual publication of the IAP's insights paper.

- (vii) The Secretariat will discuss with the Permanent Court of Arbitration and other relevant organisations on a side event on international energy disputes during the Ad Hoc High Level Conference on the International Energy Charter.

A.3	Investment Promotion and Protection in Outreach (former activities G.3, D.4)	
	<p><i>Output:</i></p> <p>(i) ToR of Model Investment Agreement</p> <p>(ii) Assessment of Model Agreements</p> <p>(iii) Partnership with UNCTAD training programme on International Investment Agreements for African, Latin America and South East Asian countries</p> <p>(iv) Co-organisation of the 2015 UNCTAD World Investment Forum</p>	<p><i>Timing:</i></p> <p>Q 1-2</p> <p>Q 3-4</p> <p>Q 1-2</p> <p>Q3-2015</p>
	<p><i>Unit responsible:</i> Directorate and SG</p>	<p>Established Staff 3</p>

(i-ii) The Secretariat will develop the Terms of Reference for a Model Investment Agreement (MIA), with the assistance of the Legal Advisory Task Force (LATF) as was envisaged in the Program of Work for 2014. The MIA will be a template which states (host government) or investors can use, as they see fit, as a starting point for negotiation of an agreement on investment in a specific project. In addition, as suggested by members in the Article 34(7) Review, the Secretariat will propose an assessment of their use and usefulness by beneficiaries.

(iii-iv) Based on previous fruitful cooperation with UNCTAD, the Secretariat will continue participation in the current debate on international investment agreements, international and domestic policy options for the promotion of international investments. In particular, the Secretariat will contribute to the relevant UNCTAD training activities for the promotion of the Energy Charter Treaty in outreach regions such as Africa, Latin America and South East Asian countries. The Secretariat will also contribute to the International Investment Agreement conference at the 2015 UNCTAD World Investment Forum, and to main publications of UNCTAD on investment such as investment country reviews, investment reports and notes.

A.4	Regional Energy Charter Forums (former activity A.7)	
	<i>Output:</i> Regional Energy Charter Forums	<i>Timing:</i> All year
	<i>Unit(s) responsible:</i> Directorate and SGO	<i>Estimated staff-months:</i> Established Staff 9.5

The Secretariat will continue to support a series of regional Energy Charter Forums. These would be based on the Secretariat's experience with the Rabat Energy Forum (2012), Bali (2013), Moscow and Ulaan Baatar (2014). The objective of the Energy Charter Forums is to raise awareness in the Energy Charter addressing relevant energy issues.

A.5	Training-Knowledge Centre	
	<i>Output:</i> Executive Energy Training Programmes	<i>Timing:</i>
	<i>Unit(s) responsible:</i> SGO and AF	<i>Estimated staff-months:</i> Established Staff 2.5 Short Term Staff 5

Executive Training Programmes will continue to be designed and delivered to add value to core areas of the Secretariat's work by addressing highly practical themes related to the activities in Area A such investment promotion and settlement of investment disputes.

POLICY AREA B: TRADE, TRANSIT, EARLY WARNING MECHANISM, EMERGENCY RESPONSE [FORMER ACTIVITY AREAS B AND C, EXCEPT FOR RECA]

B.1	Implementation of the ECT Trade Provisions³ (former activity B.5, B.6, part of A.6)	
	<i>Output:</i>	<i>Timing:</i>
(i)	Discussion on possibility to move to binding customs tariff standstill regime	Ongoing
(ii)	Monitoring and assistance to the ECT Contracting parties in publishing and implementing the updated ECT Annexes EM I, NI and EQ I in their national legislations.	
(iii)	Ratification of the Trade Amendment by the ECT Contracting Parties who have not ratified it yet.	
	<i>Unit(s) responsible:</i> Directorate	<i>Estimated staff-months:</i> Established Staff 2 Short Term Staff 2.5

The annual review with respect to the possibility of introducing the binding tariff standstill is envisaged for 2015. In 2014 the Secretariat started conducting the review in light of developments taking place in the WTO. At the meeting of the World Economic Forum in Davos in January 2014, leading WTO members pledged to favour trade in environmental goods (Davos statement). In addition, in this framework the Secretariat started cooperation with international organisations such as the World Energy Council (WEC) and the WTO in two directions: firstly, to raise awareness among the ECT constituency of the potential benefits for them to join the negotiations on favouring environmental goods in WTO, and secondly, to provide, jointly with WEC, for technical expertise to WTO delegates on the precise role of the goods listed for environment, in particular for transition to low carbon economies. In 2015 the Secretariat will continue this cooperation and revision of the possibility of the binding customs tariff standstill in the ECT in relation to the Davos statement.

In December 2013, the 24th Meeting of the Energy Charter Conference adopted the technical changes to the ECT Annexes EM I, NI and EQ I due to evolving changes in the Harmonized System. In 2015 the Secretariat will follow up with assisting the publication and implementation of these changes in the Contracting parties.

The Secretariat will continue working on the implementation of the Trade Amendment. To increase the impact of the Trade Amendment, further ratifications by the ECT Contracting Parties will be encouraged.

³ Subject to the availability of established staff.

B.2	Implementation of the ECT transit provisions (former B1, B2 and C2)	
	<p><i>Output:</i></p> <p>(i) Report on the implementation of the ECT transit provisions</p> <p>(ii) Exchange of information on policies, regulation and projects relevant for cross-border energy infrastructure</p> <p>(iii) Policy dialogue and recommendations in view of the development of specific multilateral rules on transit</p> <p>(iv) Implementation of the Conciliation and the Model Early Warning Mechanism</p> <p>(v) Study outlining the role of the ECT as an international legal framework to facilitate the development of cross-border electricity trade in regional markets.</p> <p>(vi) Assistance to the meetings of the Trade and Transit Group and ensuring interaction with Energy Charter Conference and its bodies</p>	<p><i>Timing:</i></p> <p>Q1-Q4</p>
	<p><i>Unit(s) responsible:</i> Directorate, SG DSG and AF</p>	<p><i>Estimated staff-months</i></p> <p>Established Staff 19.5</p> <p>Short Term Staff 1.5</p>

In their responses to the Review under Article 34(7), the members have identified work on the implementation and enforcement of the transit provisions of the Energy Charter Treaty as a priority activity. Energy transit is considered as being as relevant as ever for energy security.

- (i) In view of the request by the member states to take stock of the implementation of the ECT transit provisions, the Secretariat will prepare a report on the state of play across the constituency. A scoping paper will be presented at the first TTG meeting in 2015, and the draft report will be presented for discussion at the TTG in the autumn.
- (ii) The Secretariat will further promote the exchange of information, on the platform of the Trade and Transit Group, on cross-border infrastructure projects, regulation and operational aspects with regard to interconnected systems.

- (iii) The Secretariat will reserve capabilities for the development of specific multilateral rules on transit. Depending on the outcome of the 25th Meeting of the Energy Charter Conference, as well as the discussions in other Forums such as the UN and WTO, the Secretariat is ready to consider the following options:
- a. resumption of the negotiations on an a multilateral Energy Charter Protocol on Transit;
 - b. development of an Energy Charter Protocol on Transit in view of regional energy projects;
 - c. assistance to the development of regional energy projects
- (iv) The Secretariat will be available to assist with the implementation of the Conciliation Mechanism for Transit disputes under Article 7(7) ECT (mainly through the drafting of a non-binding guide/commentary of the Rules), as well as the Model Early Warning Mechanism.
- (v) The Secretariat intends to undertake a study on how trade and transit provisions of the ECT may provide the framework to enhance stability and predictability to cross-border electricity trade in regional markets.
- (vi) The Secretariat will continue to provide support to the meetings of the Trade and Transit Group and its Chairperson.

B.3 Regional Energy Cooperation (former activities B.10, B.11, B.12 and B.13)⁴

	<i>Output:</i>	<i>Timing:</i>
(i)	Regional meeting to promote regional energy cooperation in Central and South Asia;	Q1 – Q4
(ii)	Regional meeting on development of power trade in Northeast Asia	
(iii)	Establish a Task Force on Regional Electricity Cooperation in South Caucasus	
(iv)	Establish an ad hoc Task Force on Energy Cooperation in favour of Island States	
	<i>Unit(s) responsible:</i> Directorate and DSGO	<i>Estimated staff-months:</i> Established Staff 12

- (i) The Secretariat will continue its work on promoting regional energy cooperation in Central and South Asia. This activity includes support to the meetings of the Task Force on Regional Energy Cooperation in Central and South Asia established in 2007. In

⁴ Substantively financed by Voluntary Contribution

2015 it is proposed to organise the 10th meeting of the Task Force in Tashkent, Uzbekistan or Ashgabat, Turkmenistan. The work of the Task Force will be supported by a study on power trade in South Asia to be undertaken under the Fellowship Programme.

(ii) Following the Ulaanbaatar Energy Charter Forum of 2014, the ECS in close cooperation with the Ministry of Energy of Mongolia will continue to promote regional cooperation in Northeast Asia. The proposed meeting will discuss all issues of political and legal nature related to investment promotion, energy transit, trade and specific legal agreements for electricity trade and interconnections in the region. The Secretariat will facilitate cooperation by the promotion of specific legal model agreements which are critical success factors in creating a regional power pool.

(iii) Georgia, under its Energy Charter Chairmanship in 2015, has proposed as one of the priorities to establish a flagship initiative on regional cooperation in electricity in the South Caucasus. It is proposed to establish a Task Force on Regional Electricity Cooperation through implementation of two complementary tiers meeting on a regular back-to-back basis. Georgia will be at the crossroad of two proposed transport corridors:

- East-West working group, comprising Turkmenistan, Azerbaijan, Georgia and Turkey;
- North-South working group, comprising Georgia, Armenia, Iran and Russia.

This activity will include further discussion and negotiation with the stakeholders on the scope and structure of the proposed Task Force.

(iv) The Energy Charter constituency counts several island member states and states comprised of islands such as Japan, UK, Ireland, Greece, Cyprus, Malta and Iceland. Some important outreach countries such as Indonesia, Sri Lanka, and Philippines are also island states.

The Secretariat will contribute to the definition of a specific project involving island states aimed at identifying practices and policies for improving energy security through conventional or renewable energy and energy efficiency. The project will build upon dialogue between industry, financial institutions and governments to identify the energy options for island states. A study analysing existing practices and innovative options will be aimed at facilitating partnerships for the formulation and implementation of ad hoc energy policy options.

B.4	Regional Energy Charter Forums (former activity A.7)	
	<i>Output:</i> Regional Energy Charter Fora ⁵	<i>Timing:</i> All year
	<i>Unit(s) responsible:</i> SGO + Directorate	<i>Estimated staff-months:</i> Established Staff 4.5

The Secretariat will support a series of regional Energy Charter Forums. These would be based on the Secretariat's experience with the Rabat Energy Forum (2012), Bali (2013), Moscow, Ulaan Baatar, Bratislava, Tokyo and Ashgabat (2014). The objective of the Energy Charter Forums is to raise awareness in the Energy Charter addressing relevant energy issues.

B.5	Training-Knowledge Centre	
	<i>Output:</i> Executive Energy Training Programmes	
	<i>Unit responsible:</i> SGO and AF	<i>Estimated staff-months:</i> Established Staff 1.5 Short Term 5

Executive Training Programmes will continue to be designed and delivered to add value by addressing highly practical themes related to the activities in Area B; such as investment protection strategies for enhanced energy security; enabling more effective rules-based cooperation frameworks.

⁵ Subject to financial and organisational support from the host state

POLICY AREA C: ENERGY EFFICIENCY [FORMER AREA E]

C.1	Review Process (former activities E1 and E4)	
	<i>Outputs:</i>	<i>Timing:</i>
(i)	Review of the content, process and objectives of the In-depth reviews	Spring/Autumn
(ii)	One/Two ⁶ In-depth Reviews of National Energy Efficiency Policies in Winter/Spring to be possibly followed by a further review in Autumn	Winter/Spring Autumn
(iii)	Round table presentations	
(iv)	PEEREA WG meetings	
(v)	International cooperation	
	<i>Unit(s) responsible:</i> Directorate and AF	<i>Estimated staff-months:</i> Established Staff 7 Short Term 4.5

The country review process is a core activity in monitoring and facilitating the implementation of PEEREA. The reviews as well as the Round Table presentations on the latest national developments and events in the area of energy efficiency will provide the basis for policy discussions and exchange of experience in policy formulation and implementation between the member countries.

Following the conclusions of the 2014 Review under 34(7) ECT a comprehensive review of the content, process and objectives of the In-depth Energy Efficiency reviews will be undertaken. The aims of the assessment will be: i) to offer better value for the signatories of the ECT; ii) to fully adapt to the new challenges of the restructuring of the energy markets in non-OECD countries and to iii) to analyse how the reports can become instrumental to the CONEXO policy. Further the PEEREA Working Group should discuss and agree on priority activities and way of operation for the near future.

The In-depth reviews are the main tool for offering peer guidance to governments in developing and implementing energy efficiency policies. These reviews will continue to be conducted in partnership with selected countries. With regard to geographical spread, as already agreed, the focus on countries with the highest potential for improvements implies more emphasis on Eastern European and Central Asian countries, as well as on priority countries for Expansion and Outreach.

⁶ Subject to the results of review process and the availability of established staff.

The main marketing tool of PEEREA WG activities to date has been through the Working Group meetings themselves, and the publications of country reviews and horizontal studies. In 2015 the Secretariat team members will continue to exchange information with other International organisations and join activities activities of common interest (e.g. with UN, IEA, WEC, IRENA, etc).

C.2	Follow up on Reviews (former activity E.2)	
	<p><i>Output:</i></p> <p>(i) Follow up on Member State reviews to assess status of implementation of recommendations and identify policy support activities for the implementation of recommended energy efficiency measures.</p> <p>(ii) Implement policy support activities in partnership with other organisations (subject to voluntary contribution)</p> <p>(iii) Promote partnerships between developed and transition countries in different sectors (industry, buildings, renewable energies, etc.)</p>	<p><i>Timing:</i></p> <p>January to December 2015</p>
	<p><i>Unit(s) responsible:</i> Directorate</p>	<p><i>Estimated staff-months:</i></p> <p>Established Staff 4</p> <p>Short Term 3</p>

The follow up on a regular basis on the Member State reviews should continue to play an important role. New ways will also be explored on how effectiveness might be enhanced. The follow-up process will be developed in three main directions:

- (i) Identifying support activities for the implementation of the review recommendations. The analysis will be done based on the collection of responses to a questionnaire by national government stakeholders and follow-up missions to the country to discuss policy support need with the Government. In 2015 the Review follow up procedure will commence for Ukraine and Tajikistan.
- (ii) Implement policy support activities in partnership with other organisations. Such activities might be in the form of the provision of further policy support, guidance on legislation drafting, capacity building to national authorities, and support to development of pipeline energy efficiency projects, information provision or organisation of workshops. These activities should be identified in close cooperation with reviewed countries. Concrete support activities were already identified in 2014 for Albania, Azerbaijan, and Bosnia and Herzegovina. The Secretariat together with the respective government officials is already seeking financial resources for their implementation.
- (iii) The Secretariat will continue to promote the establishment of partnerships between developed and transition Member States in order to better stimulate common

actions in the implementation of energy efficiency policies and programmes in the various sectors: industry, buildings, appliances, mobility, renewable energies, etc.

C.3	Low Carbon in outreach (former E3)	
	<p><i>Outputs:</i></p> <p>Sustainable Energy Review of an outreach country⁷ and capacity building to seconded and intern officials on sustainable energy.</p>	<p><i>Timing:</i></p> <p>January-December 2015</p>
	<p><i>Unit(s) responsible:</i> Directorate</p>	<p><i>Estimated staff-months:</i></p> <p>Established Staff 3 Short Term 2.5</p>

In April 2012 the Secretariat received a voluntary contribution from the Government of the Netherlands. The Dutch Ministry thereafter specified that the contribution should be used in a way that links low carbon investment with Outreach.

The voluntary contribution will be used to implement a low carbon measure in favour of an Outreach country so as to raise the interest of that country in the Energy Charter Process, and to facilitate its possible accession. The Secretariat has proposed India as the target country for the use of the voluntary contribution. Based upon its experience of preparing energy efficiency regular and in-depth reviews, the Secretariat will prepare, together with the Indian national authorities a Sustainable Energy Review of India.

The report will contain an overview of current and planned sustainable energy strategies and policies in India and will present possible pathways for improving the performance and delivery of those policies. This activity was started in 2014 but due to political changes in India, its implementation was delayed.

⁷ Subject to availability of Seconded

C.4	Impact of market liberalisation on energy efficiency policies and programmes (new activity)⁸	
(i)	<i>Outputs:</i> Study report “Cost and benefits of liberalisation process with regard of energy efficiency. Lessons learned and recommendations.”	<i>Timing:</i> January-October 2015
	<i>Unit(s) responsible:</i> Directorate	<i>Estimated staff-months:</i> Established Staff 3 Short Term Staff 2.5

In 2002 the Energy Charter Secretariat published a report on the “Impacts of Market Liberalisation on Energy Efficiency Policies and Programmes”, which identified the possible effects of evolving competition in the energy sector of many national economies on energy efficiency. The report analysed in detail how energy efficiency policies and programmes should best be adapted to meet the challenges of energy market liberalisation.

The report included a number of case studies that highlight best practices in adapting energy efficiency policies to the conditions of the early energy market liberalisation in the European Union (EU) at the end of the 20th century.

Eastern European, Caucasus and Central Asian countries have recently been the main focus of the PEEREA Working Group and of the Secretariat’s work on energy efficiency policies and programme cooperation. These countries are now, or will soon be, on the eve of the restructuring of their energy markets to the new reality of the 21st century and therefore seeking how to well develop and implement energy efficiency policies in the new market condition.

More than 10 years after the first publication it is now proposed to update the study with the objective of analysing and assessing the actual effects of energy markets liberalisation on the development of the energy efficiency policies and markets in European Union and European Economic Area (EEA), and to produce recommendations for transfer to the Eastern European, Caucasus and Central Asian countries.

⁸ Substantially financed by voluntary contribution

C.5	Incorporating Energy Efficiency into Energy Security Planning (new activity)⁹	
	<i>Outputs:</i> Study report “Incorporating Energy Efficiency into Energy Security Planning”	<i>Timing:</i> Autumn
	<i>Unit(s) responsible:</i> Directorate and AF	<i>Estimated staff-months:</i> Established Staff 3.5 Short Term Staff 1.5

The objective of the study report “Incorporating Energy Efficiency into Energy Security Planning” is to undertake an analysis of the main drivers and shortcomings to energy efficiency deployment in the context of energy policy and energy security and national and regional level and to provide the Contracting Parties and Observer States with the necessary background information and tools to define an integrated and sustainable energy security policy. Addressing the regional realities will provide a comprehensive overview of the critical matters in the main economic regions of the globe.

⁹ Subject to the availability of established staff.

POLICY AREA D: CONSOLIDATION, EXPANSION AND OUTREACH (CONEXO) AND STRATEGY

D.1	Consolidation (formerly part of A.6)	
	<p><i>Outputs:</i> Implementation of the CONEXO Policy by achieving ratification of the Energy Charter Treaty by those original signatories who have not done so.</p>	<p><i>Timing:</i> 2015 and beyond</p>
	<p><i>Unit(s) responsible:</i> SGO</p>	<p><i>Estimated staff-months:</i> Established Staff 3</p>

The Office of the Secretary General will continue efforts to finalise ratification of the Treaty by those Signatories who have not done so. The objective will be to achieve a constituency for the Charter with a better representation from those who signed the Treaty including energy producers, consumers and transit countries, all of whom subscribe to a shared legal framework.

Consultations will be pursued with the governments of those signatories (particularly Australia, Belarus, Iceland and Norway) in their capitals and via diplomatic missions in Brussels. Those consultations will be aimed at identifying ways to facilitate their ratification of the Treaty based on the progress achieved to date.

D.2	Expansion (formerly part of A.6)	
	<p><i>Output:</i></p> <p>(i) Implementation and revision of the CONEXO Policy</p> <p>(ii) Expansion towards the current observer countries and facilitate their accession to the ECT</p> <p>(iii) Maintain and develop relations with current and observer international and regional organisations</p>	<p><i>Timing:</i> 2015 and beyond</p>
	<p><i>Unit(s) responsible:</i> Office of the SG DSGO AF</p>	<p><i>Estimated staff-months:</i> Established Staff 15.5 Short Term 10</p>

There will be a comprehensive review of the CONEXO policy, including measuring its practical effect.

Pursuant to that the Secretariat will promote the Energy Charter Process in regions/countries where the Energy Charter observers are located to provide additional benefits for these regions/countries and for the existing constituency.

Given the ultimate objective of acceding to the Energy Charter Treaty, expansion activities will concentrate on the current observer countries in order to deepen their involvement with the Energy Charter Process. At present there are two categories of Observer countries; (a) those who have signed the Energy Charter and (b) those who are Observer only by invitation. However even though the process of Updating the Energy Charter Process is underway, the first step towards accession to the ECT will still require signing the Energy Charter of 1991. The Secretariat will continue efforts to place these countries on the path of accession. Secondment programme will also be used to host national secondees from the countries who commence the process of preparing their Accession Reports. The Secretariat will provide the necessary guidance and assistance to the national authorities during this process.

Countries who are engaged in internal ratification procedures will receive full support from the Secretariat. There will be regular contact and consultations with national authorities. Activities targeted at parliamentarians and other local authorities will also be used to facilitate the ratification process.

The Secretariat will continue to maintain relations with the observer organisations, and will endeavour to attract new observer organisations by developing joint projects with them to expand the geographical reach of the Energy Charter principles. There will also be further efforts to widen the scope of cooperation with international and regional organisations on important energy topics.

D.3	Outreach (formerly part of A.6)	
	<p><i>Output:</i></p> <p>Within the framework of the CONEXO Policy as reviewed and revised, the Secretariat will promote the Energy Charter Process towards regions/countries currently outside the existing constituency.</p> <p>Cooperation on specific activities with international and regional organisations.</p>	<p><i>Timing:</i></p> <p>2015 and beyond</p>
	<p><i>Unit(s) responsible:</i> SGO, DSGO, Directorate and AF</p>	<p><i>Estimated staff-months:</i></p> <p>Established Staff 15.5</p> <p>Short Term 10.5</p>

The Outreach component of the CONEXO Policy will continue to promote the Energy Charter Treaty and the Process among key energy producing, transit or consuming countries. The Secretariat will continue to respond favourably to any country, regardless

of its geographic location, wishing to accede to the Energy Charter Treaty or otherwise to develop relations with the constituency.

There is an increased importance to the Outreach efforts since the launching of the negotiations on the Updating of the Energy Charter. Many of the countries participating in these negotiations have no formal status vis-à-vis the Energy Charter Conference. The Secretariat will therefore use this unique opportunity to strengthen relations with such countries and to encourage them to sign the International Energy Charter.

Taking into consideration the geographical areas of the new partners, the geographical scope of the Outreach, CONEXO activities will be reviewed and revised in 2015. Priority will be given to the countries who are newly involved with the Updated Energy Charter process and to others who demonstrate interest in the Energy Charter.

Cooperation will be enhanced on specific topics with the following organisations after discussion in the relevant standing group:

- i. G20;
- ii. *On international investment law and disputes:* OECD, UNCTAD, ICSID and UNCITRAL.
- iii. *On energy issues:* IEA, UNECE, IEF, IRENA (exploring cooperation in Renewable Readiness Assessments of ECT members), IPEEC and ICER – International Confederation of Energy Regulators;
- iv. *On trade and financial issues:* EBRD, IBRD and WTO.

D.4	International Energy Charter (former activity F.2(i))	
	<i>Output:</i> Promotion and adoption of the International Energy Charter	<i>Timing:</i> Q2
	<i>Unit(s) responsible:</i> Directorate, SGO, DSGO and AF	<i>Estimated staff-months:</i> Established Staff 11.5

The Secretariat will continue to facilitate the promotion and adoption of the International Energy Charter at an Ad Hoc High Level Conference in The Hague in spring 2015.

D.5	Support to the Energy Charter Strategy Group [CC 389] (Former activity F.1)	
	<i>Output:</i> Support the work of the Strategy Group and its Chairperson through analytical work, coordination activities and policy advice in line with the Group's mandate. This will involve organising two Strategy Group meetings.	<i>Timing:</i> Q1 and Q3
	<i>Unit responsible:</i> Directorate and AF	<i>Estimated staff-months:</i> Established Staff 4.5

In 2015, the Strategy Group will continue to serve as a tool to facilitate the exchange of information on significant changes in energy policies, global developments affecting the Energy Charter constituency. There will be discussions on horizontal issues, in particular those related to the implementation of the Energy Charter's policy on Consolidation, Expansion and Outreach (CONEXO) and relations with other international organisations. The Group will assist the Conference by advising on strategic policy direction, encouraging synergies among existing subsidiary bodies of the Energy Charter Conference and by giving broad orientation on the Secretariat's Programme of Work.

The Secretariat will provide organisational and substantive support to the work of the Group. This will include liaison with representatives of Member and Observer states, analysis, expert advice, and policy and discussion papers upon request of the Group

D.6	Regional Cooperation in MENA¹⁰ (former activity A.9, partly A.6 and B.3)	
	<i>Output:</i> Supporting the specific development of the CONEXO Policy within the MENA region through the benefits of a regional cooperation. This includes cooperation with the Union for the Mediterranean and other relevant regional organisations and industrial associations.	<i>Timing:</i> 2015
	<i>Unit(s) responsible:</i> Directorate and DSGO	<i>Estimated staff-months:</i> Established Staff 3

The Union for the Mediterranean (UfM) comprises 43 countries, the 28 EU member-states and 15 countries from the Middle East and North Africa (MENA). European and MENA countries face common energy challenges that require the diversification of energy supply, open and sustainable markets, and the development of energy

¹⁰ Substantively financed by voluntary contribution

infrastructure. These challenges also require adequate institutional and legal frameworks. In December 2013 the UfM did not endorse at political level the Master Plan for the Mediterranean Solar Plan as the strategic policy framework for the promotion of renewable energy and energy efficiency in the Mediterranean region. Since then the UfM has launched the establishment of technical committees to follow a step-by-step approach in order to address the essential energy needs in the Mediterranean region. The technical committees are composed of the main stakeholders active in the region: the League of Arab States, the European Commission, EIB, MEDREG, MED-TSO, MEDENER, RCREEE, MEDGRID, Dii, Res4Med and the Energy Charter Secretariat. The Energy Charter Secretariat is proposed to take part of the Working Group on Policy and Regulatory Best Practices.

D.7	Ad-Hoc Conference on International Energy Charter¹¹ (former activity A.8)	
	<i>Outputs:</i> A high level political ad-hoc Conference comprising ECT Signatories and Observers as well as other invited Countries for discussing, and adopting, an updated version of the 1991 Energy Charter.	<i>Timing:</i>
	<i>Unit responsible:</i> DSGO and AF	<i>Estimated staff-months:</i> Established Staff 8

This Conference will be held in The Hague. The objective will be to discuss, and possibly to adopt a new and revised Charter appropriate to the changed needs and challenges of energy in the 21st century. The Conference will be convened as a high level political ad hoc Conference open to the ECT constituency, Observers, and other invited countries. There will be an exploration of the possibilities of the updated Energy Charter becoming a universal framework for energy co-operation and how to give a new political impetus to the Charter Process.

D.8	Promoting the rule of law on the basis of the ECT in Africa¹² (former activity B.11)	
(i)	<i>Output:</i> Establishment of a regional task force	<i>Timing:</i> 2015
(ii)	Regional study	
(iii)	Implementation activities	

¹¹ Voluntary contribution received from the Netherlands

¹² Substantively financed by voluntary contribution

	<i>Unit(s) responsible:</i> Directorate and DSGO	<i>Estimated staff-months:</i> Established Staff 2
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The negotiations of the Updated Energy Charter have revealed increased interest from African countries in the Energy Charter. In the context of updating the Energy Charter the Secretariat will contribute to the definition of a specific regional cooperation project based on the principles of the Energy Charter Treaty and aimed at removing legal and regulatory obstacles to cross border energy exchanges based on common rules for energy markets. The project will comprise a participative study and implementation activities, including ECT based capacity building and monitoring. The project will be carried out in close cooperation with interested governments covered by this mandate. There will also be close dialogue with industry and financial institutions.

D.9	Regional Energy Charter Forums (former activity A.7)	
	<i>Output:</i> Regional Energy Charter Forum	<i>Timing:</i> All year
	<i>Unit(s) responsible:</i> SGO + DSGO	<i>Estimated staff-months:</i> Established Staff 3

The Secretariat will support a series of regional Energy Charter Forums. These would be based on the Secretariat's experience with the Rabat Energy Forum (2012), Bali (2013), Moscow and Ulaan Baatar (2014). The objective of the Energy Charter Forums is to raise awareness in the Energy Charter addressing relevant energy issues.

D.10	Training –Knowledge Centre	
	<i>Output</i> Executive Energy Training Programmes	<i>Timing:</i>
	<i>Unit responsible:</i> SGO and AF	<i>Estimated staff-months:</i> Established Staff 3.5 Short Term 4.2

Executive Training Programmes will continue to be designed and delivered to add value to core areas of the Secretariat's work by addressing highly practical themes related to the activities detailed in this Programme of Work.

POLICY AREA E: INSTITUTIONAL ISSUES, MANAGEMENT AND FINANCE

E.1	Standing Responsibilities of Legal Affairs (former activity G.1)	
(i)	Provision of legal advice to the Conference, its subsidiary bodies and the Secretariat on the interpretation and application of the Energy Charter Treaty, as well as on internal and administrative matters	<i>Timing:</i> Ongoing
(ii)	Responding to enquiries concerning the application and implementation of the ECT; access to <i>travaux préparatoires</i>	
(iii)	Updating table of disputes brought under Art. 26 ECT and follow up of compliance with rendered awards	
(iv)	Relations with the Depository	
(v)	Assistance to the Legal Advisory Committee	
	<i>Unit(s) responsible:</i> SGO	<i>Estimated staff-months:</i> Established Staff 3 Short Term 2.5

The Legal Counsel's essential responsibility is to provide legal advice as requested by the Charter Conference and its subsidiary bodies, as well as to all departments of the Secretariat, on issues related to the interpretation and application of the Energy Charter Treaty and related instruments (including the Rules of Procedure of the Charter Conference). These include both substantive issues and procedural issues. It is likely that many of these issues will again require significant input from the Legal Counsel in the course of 2015. The Legal Counsel also provides legal advice to the Secretariat regarding its daily operations, including relations with the host government, and coordinates with the depositaries of the EEC, ECT and PEEREA.

The Legal Counsel, apart from responding to external enquiries concerning the application and implementation of the ECT, will continue to raise awareness in relation to ECT dispute settlement mechanisms and to keep an updated database of known investment cases.

E.2	Updating the Procedural Rules of the Conference (new activity)	
	<i>Output:</i> Revised Rules of Procedure	<i>Timing:</i> Q2
	<i>Unit(s) responsible:</i> SGO	<i>Estimated staff-months:</i> Established Staff 2 Short Term 1

Support to the Working Group on Procedural Issues in the updating of the Procedural Rules of the Conference (including voting rights) and the Rules of Procedure for the Appointment of the Secretary General and the Deputy Secretary General of the Energy Charter Secretariat.

E.3	Budget (former activity G.4)	
	<i>Output:</i>	<i>Timing:</i>
(i)	preparation of draft Budgets,	Ongoing
(ii)	financial analysis and control of expenditure,	
(iii)	calculation and collection of annual contributions,	
(iv)	preparation of documents and support for the Budget Committee	
	<i>Unit responsible:</i> AF	<i>Estimated staff-months:</i> Established Staff 4.5

The number of Staff months has been reduced by 3 months, reflecting less available resources for this work.

E.4	Personnel (former activity G.5)	
	<i>Output:</i> Recruitment and appointment procedures, as well as all other issues related to the implementation of the Secretariat's Staff policies and rules.	<i>Timing:</i> Ongoing
	<i>Unit responsible:</i> AF	<i>Estimated staff-months:</i> Established Staff 13.5

The number of staff-months has been increased again reflecting additional work related to increased levels of temporary staff.

E.5	Financial administration (former activity G.6)	
	<i>Output:</i> (i) administration and control of all commitments and general accounting systems; (ii) payroll and expenditure; (iii) preparation of annual Financial Statements and assistance in the Audit procedure. (iv) Consideration on how to find alternative sources of financing	<i>Timing:</i> Ongoing
	<i>Unit responsible:</i> AF	<i>Estimated staff-months:</i> AF 12.5

As a result of an increased number of projects, voluntary contributions and short-term staff, six months have been added to assist in related activities, analyses and financial project management.

E.6	IT services (former activity G.7)	
(i)	<i>Output:</i> maintenance and upgrading of all communication and other technical facilities of the Secretariat,	<i>Timing:</i> Ongoing
(ii)	ensuring the functioning of all IT systems and day-to-day problem solving.	
	<i>Unit responsible:</i> AF	<i>Estimated staff-months:</i> Established Staff 2

The number of staff-month has been reduced considerably because, from 2014, part of these services has been outsourced.

E.7	Support services (former activity G.8)	
(i)	<i>Output:</i> office management,	<i>Timing:</i> Ongoing
(ii)	front-of-house management,	
(iii)	building management,	
(iv)	procurement, including contact and liaison with external suppliers,	
(v)	document dissemination procedures and support for all internal Energy Charter meetings and, in particular, the Annual Conference and other events in various countries.	
	<i>Unit responsible:</i> AF	<i>Estimated staff-months:</i> Established Staff 8

The number of months has increased to fourteen, to reflect the centralisation of travel administration and the support for an increased number of external events.

POLICY AREA F: PROMOTION AND AWARENESS RAISING, TRAINING AND KNOWLEDGE CENTRE

F.1	Legal commentary of the ECT (former activity G2(iv))	
	<i>Output:</i> Systematic legal commentary of the Energy Charter Treaty	<i>Timing:</i>
	<i>Unit(s) responsible:</i> SGO	<i>Estimated staff-months:</i> Established Staff 4 Short Term 2.5

In 2014, the Secretariat completed the reorganisation of the *travaux préparatoires* as a first step towards a systematic legal commentary on the Energy Charter Treaty.

The commentary, following the structure prepared during 2014, will provide an overview of the content and aim of the Treaty and will analyse the provisions based on the negotiating history and the existing arbitration awards. This article by article overview will raise awareness and knowledge of the Treaty.

The work, to be coordinated by the Legal Counsel, will be partly supported by legal interns and a Legal Assistant. At the final stages consideration will be given to having the support of a college of voluntary specialists within the Legal Advisory Task Force.

F.2	Training Programs and Knowledge Centre Activity (formerly part of A.3)	
	<i>Output:</i> Sequence of Occasional Papers providing in depth risk and benefits analysis for countries joining the EC Process	<i>Timing:</i> spring and autumn 2015
	<i>Unit(s) responsible:</i> SGO and AF	<i>Estimated staff-months:</i> Established Staff 5.5 Short Term 5.2

The Knowledge Centre will continue to host Research Fellows (RFs) under the Secretariat's Fellowship Program in 2015. The number of RFs hosted by the Knowledge Centre expanded substantially in 2014, and Fellows made significant contribution to the

Secretariat’s work by way of publication of Occasional Papers on topics relevant to the Energy Charter Process. Some of the more recently delivered Occasional Papers included work on energy security definitions (*in support of the work of the Trade and Transit Group / International Energy Charter negotiations*), electricity sector cooperation (*in support of work of Trade and Transit*). A secondee from China produced an excellent in-depth work on the relevance of the ECT for China (*in support of expansion with core countries/IEC negotiations*). In the course of 2015 it is envisaged that RFs from a selection of ECT member and observer countries will work on a consolidated sequence of Occasional Papers providing in depth risks and benefits analysis for those countries in joining the ECT. Thus the Knowledge Centre will in effect allow the Secretariat to help governments become better informed about what ECT membership really means for their countries. Template papers of this type were produced on the Russian Federation in 2014 and a work has already been commissioned on Egypt to come out in the first half of 2015.

Furthermore, In 2014 the Centre also launched its own periodical journal, the bi-monthly Knowledge Centre Review, a further informational tool now available for the Secretariat in order to inform the Charter constituency and wider-audience about the Energy Charter and its activities, including contributions from Fellows.

F.3	Annual Report (former activity A.5)	
	<i>Outputs:</i> Annual report 2015	<i>Timing:</i> February/April
	<i>Unit responsible:</i> SGO	<i>Estimated staff-months:</i> Established Staff 1

An Annual Report will be prepared to provide a description of the activities of the Charter Process in 2015. The Report will be produced as public relations document. All efforts will be made to have the Annual Report available at least in draft form for the 26th Meeting of the Energy Charter Conference.

F.4	Preparation of the 26th Energy Charter Conference meeting (former activity A.4)	
	<i>Outputs:</i> 26 th Meeting of Energy Charter Conference	<i>Timing:</i> Q4
	<i>Unit responsible:</i> DSGO AF and Directorate	<i>Estimated staff-months:</i> Established Staff 8

In accordance with the Treaty, the Secretariat is responsible to and reports to the Energy Charter Conference. As is now well established practice, the ordinary Meeting of the ECC will take place late in the year 2015 and will deal with the functions set out in Article 34 (3) of the Treaty.

F.5	Promotion of the Energy Charter (former activity A.1)	
	<i>Outputs:</i>	<i>Timing:</i>
(i)	Continuous information on main activities of the Energy Charter Secretariat (ECS), addressed to Ministers and higher level officials of members of the Energy Charter Conference (ECC)	Ongoing
(ii)	Regular personal contacts with Heads of Embassies and Missions in Brussels of all constituent and observer countries	
(iii)	Personal meetings with all important constituents of the Charter Process, either in Brussels or in the capitals or in international conferences	
	<i>Unit responsible:</i> SGO, DSGO and AF	<i>Estimated staff-months:</i> Established Staff 15 Short Term 1.5

The Secretary General supported by the office of the Deputy Secretary General will take the lead in promoting the authority and visibility of the Energy Charter and in drawing attention to the Energy Charter principles and instruments. The value of the Energy Charter Treaty as an international legal framework which mitigates risks affecting the energy sector will be emphasised and promoted. The contribution of the Energy Charter Treaty to international energy security will be highlighted. Such initiatives will include contact with the governments of Member and Observer States. The Directorate will support the efforts to maintain and develop relations with relevant international organisations and institutions including where appropriate political level contact through diplomatic representations in Brussels. The Secretariat, as a whole, will work to facilitate

cooperation among the Member states and to ensure implementation of the Charter, the Treaty and PEEREA.

F.6	Information policy and development of Energy Charter Knowledge Centre (former activity A.3)	
(i)	<i>Outputs:</i> Conduct of an active external information policy	<i>Timing:</i> Ongoing
(ii)	Further development of the Energy Charter Knowledge Centre	
	<i>Unit responsible:</i> SGO	<i>Estimated staff-months:</i> Established Staff 6

(i) To improve communication and transparency, the Office of the Secretary General will continue to conduct an active external information policy in order to raise public awareness of the Treaty. The Energy Charter website is an important external portal complemented by the dissemination of the Energy Charter newsletter and by printed and electronic materials produced by the Secretariat.

(ii) The Energy Charter Knowledge Centre was established towards the end of 2012 to promote research on the Energy Charter, the Energy Charter Treaty and the work of the Energy Charter Process and Secretariat. The Knowledge Centre will provide the following services:

- Library and archive centre.
- The organisation of seminars and workshops on topics relevant to the Energy Charter.
- Fellowship programmes for academics and members of think tanks on topics on which the Secretariat lacks the appropriate in house expertise (e.g. shale gas regulatory framework, energy policy in targeted regions).

F.7	Regional Energy Charter Forums (former activity A7)	
	<i>Output:</i> Regional Energy Charter Forums	<i>Timing:</i> All year
	<i>Unit(s) responsible:</i> SGO	<i>Estimated staff-months:</i> Established Staff 3

The Secretariat will organise a series of regional Energy Charter Forums. These would be based on the Secretariat's experience with the Rabat Energy Forum (2012), Bali (2013), Moscow and Ulaan Baatar (2014). The objective of the Energy Charter Forums is to raise awareness in the Energy Charter addressing relevant energy issues.

ANNEX**SUMMARY OF STAFF MONTH CALCULATIONS
CORE BUDGET**

	ACTIVITY	UNIT RESPONSIBLE	STAFF MONTHS ALL ¹³	STAFF MONTHS ESTABLISHED ¹⁴
A	Investment Promotion and Protection; Dispute Settlement		60.5	47.5
A.1	Reports on ICMS	Directorate and AF	12	9
A.2	Implementation of Investment provisions	Directorate, SG, DSG and AF	28.5	23.5
A.3	Model agreements	Directorate and SGO	3	3
A.4	Energy Charter Forum	Directorate and SGO	9.5	9.5
A.5	Training-Knowledge Centre	SGO and AF	7.5	2.5
B	Trade, Transit, Early Warning Mechanism, Emergency Response		48.5	39.5
B.1	Implementation of Trade Provisions	Directorate	4.5	2
B.2	Implementation of Transit Provisions	Directorate, SG, DSG and AF	21	19.5
B.3	Regional Cooperation	Directorate and DSG	12	12
B.4	Energy Charter Forum	SG and Directorate	4.5	4.5
B.5	Training and Knowledge Centre		6.5	1.5
C	Energy Efficiency		32	19.5
C.1	EE Review Process	Directorate and AF	11.5	7

¹³ The staff months mentioned in this column include established as well as non-established staff

¹⁴ The staff months mentioned in this column only include those of established staff according to the establishment table

C.2	Follow up on Reviews	Directorate	7	4
C.3	Low carbon in outreach	Directorate	5.5	3
C.4	Market Liberalisation	Directorate	3	2
C.5	Energy Efficiency and Energy Security	Directorate and AF	5	3.5
D	Consolidation, Expansion and Outreach (CONEXO)		94.2	69.5
D.1	Consolidation	SGO	3	3
D.2	Expansion	DSGO, AF and SGO	25.5	15.5
D.3	Outreach	DSGO, AF, Directorate and SG	26	15.5
D.4	Updated Energy Charter	Directorate, DSG, SG and AF	11.5	11.5
D.5	Support to Strategy Group	Directorate and AF	4.5	4.5
D.6	MENA	Directorate and DSG	3	3
D.7	Conference on Universal Energy Charter	DSGO and AF	8	8
D.8	Promoting rule of law in Africa	Directorate	2	2
D.9	Regional Energy Charter Forum	SG and DSG	3	3
D.10	Training and Knowledge Centre	SG and AF	7.7	3.5
E	Institutional Issues, Management and Finance		49	45.5
E.1	Standing responsibilities of LA	SGO	5.5	3
E.2	Updating procedural rules	SGO	3	2
E.3	Budget	AF	4.5	4.5
E.4	Personnel	AF	13.5	13.5
E.5	Financial administration	AF	12.5	12.5

E.6	IT services	AF	2	2
E.7	Support services	AF	8	8
F	Promotion and Awareness Raising, Training, Knowledge Centre		51.7	42.5
F.1	Legal Commentary to ECT	SGO	6.5	4
F.2	Training and Knowledge Centre	SGO and AF	10.7	5.5
F.3	Annual Report	SGO	1	1
F.4	CC meeting	DSGO, AF, Directorate	8	8
F.5	Promotion of ECT	SGO, DSGO and AF	16.5	15
F.6	Information policy	SGO	6	6
F.7	Energy Charter Forums	SGO	3	3
	TOTAL		335.9	264