



September 1st, 2022

weCARE support for

State Aid – Czechia – Support for the construction and operation of a new nuclear power plant at Dukovany site (Project)

Procedure: Case SA.58207 (2021/N)

Measures were notified to the Commission on 15 March 2022

[Delay for submitting comments pursuant Article 108\(2\): 5 September 2022](#)

BY EMAIL TO Stateaidgreffe@ec.europa.eu

Dear Madam, Dear Sir,

On behalf of weCARE, and Alliance of NGOs representing civil society, we would like to express our support to the planned project to build new nuclear power unit at the Dukovany site (EDU II) in the Czech Republic.

As expressed at numerous occasions via Letters to the EU institutions, in particular to the European Commission, weCARE is convinced that nuclear energy is a key element to ensure the delivery of Clean Affordable and Reliable energy to the European citizens and serve the European economy. The current geopolitical events prove we were right. Therefore, EDU II and similar projects should receive sufficient

financial and political support to prevent further energy supplies crises while maintaining our direction towards climate neutrality by 2050.

At the same time, we would like to express our support to the proposed state aid scheme as this ensures a long-term stability of the project and therefore significantly contributes to achieving decarbonization and security of supply goals.

In addition, we believe that the national legal measure in the Czech Republic, namely the Act on Measures for the Transition of the Czech Republic to a Low-carbon Energy Sector provides a sound legal basis for the project and one of its state aid components, the PPA. We are convinced that the proposed periodic PPA price review does act as a sufficient automatic stabilizer to prevent overcompensation and the assumptions used to estimate the required return of equity (RoE) correctly reflect the risk exposure of CEZ and the risk borne by the beneficiary.

In our opinion, the Special Purpose Vehicle (SPV's) design is reasonable with limited impacts on the market as CEZ and EDU II are two different economic entities. Furthermore, we understand that EDU II and the Supply SPV are completely independent entities (SPV shall not be part of a vertically integrated group controlled by CEZ). Therefore, there is no scope for market manipulation.

Thank you very much for taking our input into account.

We remain at your disposal for any further information/interaction you would like to get from/with weCARE.

Yours faithfully,

Marc Deffrennes, Richard Ivens, Serge Crutzen
weCARE

marc.deffrennes@hotmail.com

richard.ivenstelenet.be

crutzen.serge@gmail.com

weCARE is a Brussels-based alliance of NGOs campaigning in Europe for Clean, Affordable and Reliable Energy. The weCARE website (<https://www.wecareeu.org/>) describes the aims and specific activities of the alliance and lists the current member organisations: Sauvons le Climat FR, Patrimoine Nucléaire et Climat FR, Terraprxaxis UK, 100TWh BE, Ekomodernist FI, Jihocesti TatKove

CZ, Institute for Sustainable Energy PL, 18for0 IE, European Association for Energy Security SK, Stichting Energietransitie en Kernenergie NL.

weCARE is listed in the EU Transparency Register under number 473723535459-78.