

## MONITORING AND EVALUATION OF ENERGY SECTOR TRANSPARENCY: WARTIME CASE

*Riabtsev Gennadii*

*National University Kyiv-Mohyla Academy, Kyiv-Mohyla School of  
Governance, Kyiv, Ukraine*

**Abstract:** The Energy Transparency Index is a policy tool developed to comprehensively assess the availability and quality of information in the energy sector, diagnose gaps, analyze transparency by categories, energy markets, public authorities, and particular indicators, and track progress. The Index has a hierarchical structure, where the bottom level comprises about 230 specific indicators, and the top level represents a total Index score. All indicators are evaluated by six transparency criteria: availability, accessibility, relevance, frequency, usability, and completeness of information. The overall scores of indicators vary from 0 to 4. The Index "tree" is an internal structure and demonstrates transparency scores for all elements and dimensions of the Index. These elements and dimensions embrace five energy markets, five sectoral, and three cross-sectoral categories. At the bottom Index level, one can identify specific gaps in the transparency of Ukraine's energy sector. These are the so-called "black boxes," i.e., the indicators, information on which is entirely unavailable. According to the assessment made in 2021, Ukraine's final score – 63 out of 100 – indicates medium transparency in the sector.

The war and the introduction of martial law caused a sharp drop in the information openness of the sector – the Index fell by 24 points. An in-depth analysis identified three key factors that led to the loss of transparency: a directive prohibition on data publication, decisions of reporting entities to limit the volume of public data or stop their publication during martial law, and the "fog" of war. The first two factors have a legislative nature and were caused by reactive amendments to legislation prohibiting the disclosure of specific data or limiting their publication. The third factor is synthetic and not directly related to legislative changes. It encompasses a set of destabilizing shifts caused by the war, which have resulted in the loss of the ability of data administrators to disclose information. The "black boxes" and gaps in transparency and accountability identified by the assessment provided the basis for specific recommendations to public authorities and companies. Given the specifics of the martial law's impact on information openness, the recommendations were grouped into three groups: general (regardless of martial law), recommendations for the martial law period allowing to improve transparency while avoiding security risks partially, and recommendations for the transparency recovery after the cancellation of martial law.

Several model calculations of the potential restoration of information openness in Ukraine's energy sector were conducted in the wartime Index edition. In particular, canceling legislative restrictions on information disclosure after the cancellation or termination of martial law may allow for a quality improvement in transparency – from the current 39 points to 57 points. Moreover, the recommendations for the martial law period will allow for achieving a "quick effect" and improving the overall information openness of the sector to 47 points even before the end of martial law. Notably, it will enhance transparency in 6 out of 8 categories and 3 out of 5 energy markets. In the future, it will be necessary to solve the following problems: determining the optimal number of experts to evaluate indicators and testing the reliability of the methodology in other sectors of the economy.