



Declaration of Interests Form

- YEAR 2025 -

This Form should be used for the Declaration of Interests, as referred to in the Decision of the Administrative Board of the Agency for the Cooperation of Energy Regulators No 02/2015 of 31 January 2015 and in the Guidelines on the prevention and management of conflict of interest for the Administrative Board and Board of Appeal of the European Union Agency for the Cooperation of Energy Regulators, and where relevant, reflecting the legislative background (Regulation (EU) No 2019/942, Directive (EU) 2019/944, and Directive 2009/73/EC).

Broadly speaking, there is a conflict of interest where the impartiality and objectivity of a decision, opinion or recommendation of the Agency and/or its bodies, is or might in the public perception be compromised by an interest held by, or entrusted to, an individual working for the Agency or his/her close family members. However, having an interest does not necessarily mean having a conflict of interest. In particular, high quality of expertise is by nature based on prior experience and knowledge acquired in the relevant domain. Declaring an interest does therefore not automatically disqualify someone or limit his/her participation in the activities of the Agency.

The Declaration of Interests form is intended to provide the public with transparency on all potential elements that might jeopardise the independence of those involved when working in or with the Agency.

The completed Declarations will be reviewed in accordance with the Agency's Policy for the prevention and management of conflicts of interest and the Guidelines on the prevention and management of conflict of interest for the Administrative Board and Board of Appeal of the European Union Agency for the Cooperation of Energy Regulators.

Name:

Chiara Petruzzo

Position in the Board or Agency¹:

ALTERNATE MEMBER OF THE BOARD OF APPEAL

I hereby declare the following interests that could be prejudicial to my independence (please specify the interest that you or your close family members² currently have or have had in the recent past³).

I. EMPLOYMENT, CONSULTANCY, LEGAL REPRESENTATION OR ADVICE

In order to assess the possibility of a conflict of interest, please provide details of any employment (in any form; including self-employment), currently held or any other professional relationship entered into in the recent past⁴ by you or your close family members⁵ with a natural or legal entity⁶ or other organisation⁷ with an interest in the field of activity of the Agency and directly affected by the Agency's activities, or a trade associations of such persons.

I have nothing to declare in this respect

I declare the following interests:

ACTIVITY	TIME PERIOD	ORGANISATION ⁸	DESCRIPTION ⁹
Short-term non-remunerated Legal Expert	July 2020/ October 2021	ACER The Agency for the Cooperation of Energy Regulators Trg. Republike - Ljubljana - SI.	Independent Legal Counsel to ACER Departments
Legal Expert on ACER activities	April 2021/ October 2021	ARERA Autorita per Energia, Reti e Ambiente, Piazza Cavour 5, 20121 Milan (IT)	Legal Counsel on ACER activities relevant for ARERA
Legal Expert on ACER activities	8 July 2024/on going	ARERA Autorita per Energia, Reti e Ambiente, Piazza Cavour 5, 20121 Milan (IT)	Legal expert on "the methodological and preparatory analysis relating to the possible coordinated enforcement actions at international level, of a sanctioning nature, against the European bodies in which the TSOs/national market operators sit in order to verify non-compliance with the constraints set by EU legislation, i.e. Regulations (Network Codes) adopted by the Commission and implementing rules approved by ACER or by the regulators (so-called European regulation methodologies (Network Codes or Guidelines)" (ARERA decision 275/2024/A of 4 July 2024)

II. MEMBERSHIP OF MANAGING BODY, ADVISORY BODY OR EQUIVALENT STRUCTURE

In order to assess the possibility of a conflict of interest, please provide details of any membership in a managing body, advisory body, or equivalent structure, by you or your close family members¹⁰ in the recent past¹¹, which means any participation in the internal decision-making body of an energy market participant directly and individually concerned by the Agency's activities, or a trade association of such persons, or membership of other organisations¹².

- I have nothing to declare in this respect
 I declare the following interests:

ACTIVITY	TIME PERIOD	ORGANISATION ¹³	DESCRIPTION ¹⁴

III. OTHER MEMBERSHIP OR AFFILIATION

In order to assess the possibility of a conflict of interest, please provide details of any membership or affiliation either of yourself or of your close family members¹⁵ in the recent past¹⁶. For completeness,



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please also provide details of any other arrangements, other than those declared in Sections I and II above, which can be perceived as creating a potential conflict of interest.

- I have nothing to declare in this respect
 I declare the following interests:

ACTIVITY	TIME PERIOD	ORGANISATION ¹⁷	DESCRIPTION ¹⁸

IV. RESEARCH FUNDING

In order to assess the possibility of a conflict of interest, please provide details of any support (including grants, rents, sponsorships, fellowships, non-monetary support) that you, your close family members¹⁹ or any research entity to which you or your close family members belong(ed) has received in the recent past²⁰ from a commercial entity or other organisation with an interest in the field of activity of the Agency.

- I have nothing to declare in this respect
 I declare the following interests:

ACTIVITY	TIME PERIOD	ORGANISATION ²¹	DESCRIPTION

V. INVESTMENTS

In order to assess the possibility of a conflict of interest, please provide details of any current investment that you or your close family members²² have in a commercial entity with an interest in the field of activity of the Agency²³ (including holding of stocks and shares, stock options, equity, bonds, partnership interest in the capital of such undertaking) or in one of its subsidiaries.

- I have nothing to declare in this respect
 I declare the following interests:

ACTIVITY	TIME PERIOD	ORGANISATION ²⁴	DESCRIPTION

VI. OTHER RELEVANT INFORMATION

In order to assess the possibility of a conflict of interest, please indicate any other elements that could be seen as jeopardising your independence when working for the Agency.

- I have nothing to declare in this respect
 I declare the following:



ACTMTY	TIME PERIOD	ORGANIZATION	DESCRIPTION
Judicial action before national Court (Tribunale Amministrativo Regionale - TAR Lombardia)	Action commenced on 2 August 2022/ pending		Legal action promoted by the undersigned against ARERA's decision to withhold indemnities linked to Board of Appeal membership (decision of ARERA of 23 February 2022), as the final act of alleged downgrading behaviour by ARERA in its capacity of public employer, also legally challenged.
Administrative action before the Commission of access to documents (Commissione per l'accesso ai documenti presso la Presidenza del Consiglio dei Ministri)	Action commenced on 27 January 2023/decision of rejection lodged on 14 March 2023		Administrative action promoted by the undersigned against ARERA's decision to reject a request of access to documents (internal notes and documents) supporting appointment as member (alternate) of Board of Appeal of ACER. The request of access to documents was filed under Italian administrative law (legge 241/90).
Judicial action before national Court (Tribunale Amministrativo Regionale - TAR Lombardia)	Action commenced on 20 April 2023/ order of the Court lodged on 27 June 2023		Legal action promoted by the undersigned against the decision of rejection of the <i>Commissione per l'accesso ai documenti</i> to gain access to ARERA's decision to withhold indemnities linked to Board of Appeal membership (decision of ARERA of 23 February 2022) and challenging the legality of denial of access to the contested decision. On 15 June 2023, ARERA withdrew the contested decision based on a review of the soundness of the same decision performed after legal action was initiated.
Judicial action before national Court (Tribunale Amministrativo Regionale - TAR Lombardia)	Action commenced on 3 September 2024/pending		Legal action promoted by the undersigned against ARERA's decision 275/2024/A of 4 July 2024, challenging alleged unlawful downgrading from the role of Data Protection Officer and Project Leader for cybersecurity to a less qualified position and potential conflict of interest under ACER and ARERA's conflict of interest policies.



<p>Administrative action before the Commission of access to documents (Commissione per l'accesso ai documenti presso la Presidenza del Consiglio dei Ministri)</p>	<p>Action commenced on 20 November 2024/decision of dismissal of 27 January 2025</p>	<p>Administrative action promoted by the undersigned against ARERA's decision to reject a request of access to documents (internal notes and documents) concerning an EU financing granted to ARERA by the National Cybersecurity Agency (ACN) under the Recovery and Resilience Facility framework. The request of access to documents by the was filed by the undersigned under FOIA (d.lgs. 33/2013). The action before the Commission of access to documents was dismissed because access to documents was granted following a second request filed by the undersigned under Italian administrative law (legge 241/90).</p>
<p>Administrative action before the Anticorruption Officer (Responsabile per la corruzione e la trasparenza - RPCT) of ARERA</p>	<p>Action commenced on 20 November 2024/decision of dismissal of 5 December 2024</p>	<p>Administrative action promoted by the undersigned against ARERA's decision to reject a request of access to documents (internal notes and documents) concerning an EU financing granted to ARERA by the National Cybersecurity Agency (ACN) under the Recovery and Resilience Facility framework. The request of access to documents was filed under FOIA (d.lgs. 33/2013). The action before the Anticorruption Officer of ARERA was dismissed because access to documents was granted following a second request filed by the undersigned under Italian administrative law (legge 241/90).</p>



I, hereby, declare that I have read Decision No 02/2015 containing the Agency's Policy for the prevention and management of conflicts of interest, as well as the Guidelines on the prevention and management of conflict of interest for the Administrative Board and Board of Appeal of the European Union Agency for the Cooperation of Energy Regulators ('the Guidelines'), and that the above Declaration of Interests is to my best knowledge complete and in compliance with such Decision No 02/2015 and the Guidelines, and where relevant, the legislative background.

I understand that the Declarations of Interest will be processed according to the Policy for the prevention and management of conflicts of interest and the Guidelines and entered in a register held by the Agency.

The Declaration of Interest will also be published on the Agency's website. For security and data protection reasons the signatures provided on the Declaration of Interest will not be visible when it is published on the Agency's website.

Please note that the Agency will ensure that your personal data hereby submitted is processed in line with Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data²⁶. For more details on the processing of your personal data, see the privacy statement applicable to your situation²⁷.

If you include information on close family members, please inform them that the Agency will be processing data related to them.

Done at Milan on 4 February 2025

Signature:

¹ Indicate if you are a Member or Alternate Member of the Board of Appeal or of the Administrative Board of the Agency.

¹ 'Close family members' means a partner in a stable relationship, siblings or a direct ascendant or descendant of persons subject to Decision AB No 02/2015 of the Administrative Board of the Agency for the Cooperation of Energy Regulators of 31 January 2015 laying down a policy for the prevention and management of conflict of interest and the Guidelines on the prevention and management of conflict of interest for the Administrative Board and Board of Appeal of the European Union Agency for the Cooperation of Energy Regulators.

In case you add information on your close family members, please inform them that the Agency will be processing these data about them and that further information is available on the Agency's website.

² The Declaration must cover current interest, as well as those held over at least the last 5 years.

³ See footnote 3.

⁵ See footnote 2.

⁶ This includes any commercial business, industry association, consultancy, research institution or other enterprise whose funding is significantly derived from commercial sources. It also includes independent own commercial businesses, law offices, consultancies or similar.

⁷ This includes any governmental, international or non-profit organisations.

⁸ Indicate the organisation, whether it is a private or public entity, as well as full address and contact details.

⁹ Provide details of your role in the organisation, including a description of your duties and responsibilities and indicate the executive or non-executive nature of such duties and responsibilities.

¹⁰ See footnote 2.

¹¹ See footnote 3.

¹² It includes membership of the government of a Member State of the Union or of the European Economic Area, membership of the European Parliament, as well as membership of the Agency's Administrative Board, Board of Appeal, Board of Regulators, working groups and task forces.

¹³ See footnote 8.

¹⁴ See footnote 9.

¹⁵ See footnote 2.

¹⁶ See footnote 3.

¹⁷ See footnote 8.

¹⁸ See footnote 9.

¹⁹ See footnote 2.

²⁰ See footnote 3.

²¹ See footnote 8.

²² See footnote 2.

²³ In other words, investments in a market participant directly affected by the Agency's activities.

²⁴ See footnote 8.

²⁵ See footnote 8.

²⁶ OJ L 295, 21.11.2018, p. 39.

²⁷ <http://www.opa.europa.eu/evlen/fin-agency/PaustData-Protectiortasox>