

CLIMATE-RELATED DISCLOSURES REPORT 2023



Preface

TrønderEnergi underwent a demerger in October 2022 and established the renewable power company Aneo in partnership with the equity fund HitecVision. TrønderEnergi will consist of hydropower production and operation, while Aneo will focus on new growth opportunities within other areas of renewable power. There is and will continue to be a close relationship between the two companies as TrønderEnergi is part owner of Aneo, and Aneo is part owner in a portion of the hydropower facilities.

Due to the company demerger in October 2022 the reporting for said year was combined for both companies. This document is a revised version of the 2022 report and includes new assets from 2023. The revised version of this report includes the same companies and will therefore be published representing both Aneo and TrønderEnergi.

Hence, this report covers all activities in Aneo and TrønderEnergi, including

- Aneo Build
- Aneo Eiendom
- Aneo Hydrogen
- Aneo Industry
- Aneo Mobility
- Aneo Real Estate
- Aneo Retail
- Aneo Vekst Fornybar
- Aneo Wind
- TEK



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Background

- TCFD-guidelines
- Taxonomy-alignment

As the consequences of climate risk becomes more apparent the need for climate risk reporting gain importance. Aneo and TrønderEnergi has chosen to use the most widespread guidelines for climate risk reporting to communicate our findings in the most effective way. This report is hence based upon the Task Force on Climate-related Financial Disclosures (TCFD)¹.

Aneo's and TrønderEnergi's sustainability reporting is in reference to GRI and consists of a Sustainability Report and three auxiliary documents, which in combination account for our view of double materiality. The auxiliary documents consist of a report on the EU Taxonomy, GHG accounts and lastly this report for climate-related risk. However, as the Do No Significant Harm-principle relating to Climate Adaption in the Taxonomy requires an Assessment of physical climate risk, this

report is also intended to document the necessary evaluations for that process.

TCFD-guidelines

TCFD recommendations focus on the financial implications of climate change, and these are evaluated through the use of climate scenario analysis. The TCFD disclosures also guide us to be more consistent and transparent in reporting climate-related risks and opportunities. That entails reporting in accordance with the topics described in the figure below; governance, strategy, risk management, and metrics and targets. These are reported as part of the *Our Core Elements*-chapter.

The Task Force recognizes that for many organizations the scenario analysis will be a largely qualitative exercise. Our ambition for this report is to increase our

¹https://assets.bbhub.io/company/sites/60/2021/ 10/FINAL-2017-TCFD-Report.pdf

understanding and experience as well as communicate results to our stakeholders. As such, we've strived to minimize the number of qualitative assessments but found that at present it's unavoidable to make final assessments based mainly on our qualitative expertise.

Taxonomy Alignment

In order to be aligned with the EU Taxonomy a given activity must fulfil the Significant Contribution Criteria, not be in conflict with the Do Significant Harm criteria and meet minimum social safeguards. The Do No Significant Criteria relating to Climate Adaptation defines a process based on qualitative screening requirements. There are three main requirements listed to be taxonomy-aligned

- Identify which Physical Climate Risk(s) that can affect the economic activity during its lifetime
- Assess the climate risk and vulnerability to understand materiality of the Physical Climate Risk on the economic activity
- Assess the adaptation solutions that can reduce the Physical Climate Risk

These taxonomy requirements and the classification of hazards listed in Appendix A^2 of the Taxonomy are all integrated into our process of climate risk assessment, and hence included in this report.

used to assess and manage relevant climate-related risks and opportunities

Risk Management

The process used to identify, assess and manage climate

related risks

Strategy

The impacts of climate-related risks and opportunities on business, strategy and financial planning

Governance around climate-related risks and opportunities.

² https://ec.europa.eu/sustainable-finance-taxonomy/assets/documents/CCM%20Appendix% 20A.pdf



Metrics and Targets



Our Core Elements

- Governance
- Strategy
- Risk management
- Metrics and Targets

The UN Climate Panel (IPCC) has never been as clear as in the sixth assessment report; the world community is facing dramatic climate change due to human activities. These changes will create challenges of such a large scale that it's justified to call the situation a "climate crisis". We take that very seriously.

As a producer of renewable power our main priority is to continue to offer pure, cost-effective energy in a sustainable manner. Our main goal is to be climate-neutral by 2030.

Governance

If we are to succeed in addressing climate issues, we must prepare for the changes to come, and continue to base all our decision-making on a perspective of sustainability. Our approach to

sustainability is therefore integrated in our governance principles, reflected in our code of conduct and policies, and integrated in how we work with suppliers and partners.

The Board of Aneo and TrønderEnergi review, monitor, and discuss safety, security, and sustainability issues and risks. These topics are discussed in ordinary board meetings, either as an integrated part of strategy and investment discussions or as separate topics on a case-to-case basis.

The CEO is responsible for Aneo and TrønderEnergi's day-to-day actions related to sustainability. The CEO of Aneo has allocated the responsibility of supervising work with sustainability issues to EVP Technology and Development. Also, a Sustainability Committee led by the manager of sustainability is established to

supervise the company's sustainability performance and discuss relevant sustainability topics, issues and risks.

The management of sustainability-related risks, including climate-related risks, is embedded in our enterprise risk management process which is reported to the Board yearly.

Further, all employees have a responsibility to comply with and execute the company's sustainability ambitions and manage relevant sustainability risks and performance on a daily basis.

In TrønderEnergi the CEO has the overall responsibility for sustainability issues. Within the established corporate governance framework, the board, CEO, corporate management and all other employees collectively drive the sustainability efforts.

Strategy

Partly as a response to the climate-related challenges the global community face, the energy sector is in a crucial period that requires large-scale production increase and improvement of utility capacities. TrønderEnergi and Aneo activities are mainly based in Norway³, and hence we closely follow the Norwegian emission mitigation targets for 2030 and 2050. If we are to meet these and other international targets, the increasing demand for renewable energy must be met.

In Norway we leave behind a long period of power surplus, and by the end of this decade we'll face a new era of power deficit. This overarching development is in essence the bedrock for our company strategy as a producer of renewable power, and as such climate-related risks and

opportunities are ingrained in the fabric of our company vision.

If we reach the target of keeping temperature increase below 1.5 degrees it will mean reduced *physical* risks compared to higher temperature increases, but also increased transitional risks as the regulatory and political environment has changed drastically to incentivize the required mitigation efforts. As climate change has been and is happening, all activities are subjected to physical climaterelated risks. Especially in companies like ours where harnessing the raw forces of nature is our core business. However, this core business also ensures that we are especially well-equipped to analyze and adapt to these changes, as we are intrinsically linked with the physical consequences of climate change in our daily routines. Our business model requires short- and long-term planning based upon weather and corollary climate projections. This way our daily operations help ingrain climate-related physical risks in the analvses that govern all business decisions, increasing our main strategy resilience.

Furthermore, the required licenses to operate renewable power plants ensure that we keep a close eye on the regulatory and political environment that potentially could represent substantial transitional risk. This ensures that our strategy processes are tailored to incorporate new climate-related reports and political plans, thereby decreasing the resulting transitional risk. This way our strategy process is adaptable to climate-related regulatory change, whether it's of physical or transitional origin.

ANEO

³ In 2023 Aneo invested in two windparks in Sweden and is in the process of completing a solar farm.

There are, and will to an increasing degree be, new or elevated operational challenges due to climate change. We acknowledge that and hence include physical and transitional risks and opportunities in our strategy development, and this document is an extension of that. Internally we produce annual status documents for an array of technologies and relevant political and processes. regulative In 2022. conducted an analysis of countries with assistance from EY, ranking them by an ESG score. Furthermore, we have for several years been heavily engaged in fascinating R&D projects within both national and international fund schemes. Among these are the EU projects Remote and Positive CityxChange which were completed in 2023. In addition to external reports and consultants, these documents constitute the basis for our strategy process. It is these interlinked processes that lead to our belief in for instance onshore wind power, and solar power at our latitudes.

Lastly, Aneo is a direct result of the observed discrepancy between the need for more renewable power due to climate change, and TrønderEnergi's ability to provide the capital required under the existing company structure to invest in renewable production capacity. Hence, the establishment of the renewable power company Aneo in partnership with the equity-fund HitecVision is the most clear and direct evidence of our conviction of our ability to help solve climate-related challenges and risks, and our ability to acquire the necessary means to do so.

In essence, this creates an important double materiality link between climaterelated risks and our company strategy; If climate change increases, Aneo's business opportunities increase. And more importantly it's reverse; if Aneo succeeds, the climate stands to gain.

Risk Management

Managing climate-related risks

Similar to other types of risk management, climate risks are managed by our risk management process. The key steps of this process follow the international risk management standard, ISO 31000:2018, and include risk analysis, risk evaluation, risk treatment, recording and reporting.

Whereas risk analysis comprises the assignment of likelihood, consequence and risk level to the different risks, risk evaluation comprises the process of comparing the risk level to our acceptance criteria (i.e.. risk appetite). In assessments where the risks are identified and evaluated qualitatively, this is usually done in workshops that include personnel with expert knowledge of the subject and personnel that are affected in some way by the relevant risks. Risk treatment includes the process of reducing risk by means of mitigating measures where this is found to be necessary, otherwise, the risk is transferred to other actors (e.g., insurance company) or accepted as is if the risk level is tolerable. Recording and reporting usually comprise the registration of risks in our digital risk assessment tool and reporting the status of risks and mitigating measures to relevant internal and external stakeholders.

Identifying and assessing climaterelated risks

Our process for identifying and assessing climate-related risks uses TCFD guidelines and Taxonomy requirements as a basis but is adjusted to better suit the specific needs of our company.

The process of identifying and assessing climate-related risks starts by compiling a



list of potentially relevant risks. These risks include physical and transitional risks, e.g. regulatory changes. Further discussions were hence based on three scenarios which allowed for consideration of both physical and transitional risk. These risks

were then evaluated according to their effect on Optimal Energy Production, Long Term Asset Management and HSSE. These risks were then applied to our strategy and their potential economic impact was evaluated.

Procedure to define climate-related risks and opportunities

1	List of risks	Uncovering potentially relevant climate-related risks and opportunities
2	Evaluation of risks	Considering the list of risks ⁴ and focusing on those found to be most relevant or valuable to evaluate with what information is currently available. Concluded to focus on physical and transitional risk
3	Scenario definition	Chose three scenarios: two highlighting physical risk and one highlighting transitional risk
4	Risk analysis	Conducted a risk analysis for each of the scenarios established through points 1 to 3
5	Assessment by expertise	Workshop with in-house expertise to evaluate potential risks and opportunities, their relevance, probability and consequence
6	Strategy assessment	Consider to what degree the established risks and opportunities align with the company strategy
7	KPI	Define KPIs to assess climate-related risks and the work on them
8	Goals	Establish goals for the short- and long-term
9	Calculation of cost	Estimate the cost and financial opportunity for each potential occurrence
10	Reporting	Summarize results and report in connection to the yearly report
11	Internal Awareness	Organize internal events and communication to ensure companywide familiarity with the results and procedure

Metrics and targets

To measure company progress, Aneo and TrønderEnergi have defined several metrics and targets for climate risk assessment. They assist our work in measuring climate risk, stay updated and implement necessary measures. Furthermore, they are implemented into our

strategic work through the score cards of upper-level management and will be registered and reported on in our annual climate risk assessment. By using the metrics and targets actively they help us focus on the effect of climate change on our business and adapt accordingly. We are continually seeking improvements and are

⁴ Including the risk categories listed by the EU Taxonomy



working towards implementing more KPIs for climate-related risks in coming years.⁵

	Unit	Content	Targets
Performance Metrics	Operation time (%)	Percentage of year in operation for our power producing assets	
	Internal status documents (No.)	The number of internal status documents investigating and overseeing relevant regulatory and political processes	
Progress Metrics	Share of assets at risk	Percentage of assets that are defined to be at risk in the physical risk assessment	

https://www.aneogroup.com/no/baerekraft/rapporter/



⁵ For more KPIs regarding Aneo's effect on the climate (i.e. GHG-emissions) see



Climate-related Risks and Opportunities

- Physical risk
- Transitional risk

Change can to a company represent uncertainty as the applicability experience is reduced. Hence, for a company involved in utilizing the powers of nature, climate change represents an important challenge as the associated uncertainty is directly linked to our daily operations. The "expected" is based on historical data and experience that draws on circumstances no longer present. Furthermore, the degree of climate change is completely dependent upon what action is taken (or not taken) on an international, global scale. This feedback loop increases the complexity of any climate assessment.

Scenario analysis is the preferred way to reduce this complexity and assess the risk involved. This provides a method to understand potential implications of different conditions and understand the consequences of climate change on our activities. Climate scenarios can be placed along a spectrum moving from maximum to minimum physical risk through physical change. A minimal physical change presupposes large political changes to incentivize the actions required to enable climate change mitigation on a scale not achieved so far, and as such entails transitional risk.

This report is based on three climate scenarios to understand the consequences of climate change on our activities. Two of the scenarios are physical risk scenarios, introducing unsuccessful climate change mitigation on different scales. The third scenario is the transitional risk scenario, representing a world where shifts in policies, market demands, technology development and societal responses have succeeded in drastically reducing climate

change. In combination these three scenarios provide insight into the potential consequences for our activities.

Physical Risk

The assessment of physical risk is based upon the report «Klima i Norge i 2100» and the scenarios developed by *Norsk Klimaservicesenter*.^{6,7} Combined, these provide information on two scenarios and two time periods, 2031-2060 (*short-term*) and 2071-2100 (long-term).

Norsk Klimaservicesenter has based their scenarios on data gathered from EURO-Cordex, a Word Climate Research Programme (WCRP) initiative founded in 2009. The potential consequence was then defined and graded along a four-level color code ranging from opportunity to risk.⁸ The basis for this evaluation was a comprehensive list of potential risks,

Scenario 1 (RCP4.5)

Assumes relatively constant emissions until 2050 and then emission cuts. Relative to the period 1850-1900, the global temperature increase by the end of the century is around 2.5 °C

Scenario 2 (RCP8.5)

Assumes continued increase in emissions towards the end of the century. Relative to the period 1850-1900, the global temperature increase by the end of the century is around 4 °C

including climate-related hazards from the list in the EU Taxonomy Appendix A.9

For assets in Sweden, we integrated SMHI scenarios from (Swedish Meteorological and Hydrological Institute). These scenarios, aligned with RCP 4.5 and RCP 8.5, cover different time frames: 2041-2070 (short-term) and 2071-2100 (longterm). The baseline for the Swedish scenarios spans from 1971 to 2000. We selected comparable climate indicators as those used in Norwegian scenarios, though with some adjustments due to variations in data sources. Lastly, we evaluated these changes against our risk categories¹⁰

Aneo's and TrønderEnergi's assets cover a broad range of activities. These are subjected to different types of risk and in different scales. The risk assessments were hence carried out separately for our power production plants and our downstream activities. The overall evaluation was that none of our power production plants has a climate-related risk that warrant immediate or short-term action.11 However, some assets are subjected to a larger risk than others. Those that are defined to be at risk will be the focus of future climate risk assessments and are already incorporated into our risk management systems. 12 The management of our physical assets are conducted with a

¹² See Appendix for detailed risk assessment.



⁶ https://klimaservicesenter.no/kss/rapporter/kin2100

⁷https://klimaservicesenter.no/climateprojections? index=air_temperature&period=Summer&scenario =RCP45&area=NO

⁹ https://ec.europa.eu/sustainable-finance-taxonomy/assets/documents/CCM%20Appendix% 20A.pdf

¹⁰ See the Appendix in this report for results.

¹¹ None of the climate risk assessments conducted in this report warrant short-term actions within a time scope of the next five years as described in Appendix A of the EU Taxonomy

long-term view and complying with all relevant laws and regulations.¹³

The downstream activities are not subjected to forces of nature to the same extent as the power production portfolio and therefore not subjected to the same degrees of physical risk. The downstream portfolio is considered to be of no climate-related immediate risk, and therefore they are not considered to warrant adaptations а relevant in timeframe.14

Transitional risk

The assessment of transitional risk is based upon the Norwegian Government's Climate plan for 2021-2030¹⁵ and the World Energy Outlook by IEA. In combination, these offer insight into the political landscape that would be required to reach the 2030 Climate Goals. At the current emission mitigation trajectory, the global temperature increase is projected to be 2.7 °C above pre-industrial levels. ¹⁶ In other words, there is a substantial gap between the climate goals and the action taken to reach those goals.

Aneo and TrønderEnergi assume that this discrepancy between the actions taken, and actions needed will lead to increased political pressure towards 2030.¹⁷ As the 1.5°C scenario is slipping away, new ambitious policies must be implemented. Overall, this development is expected to result in an increasing transitional risk. The general development will point to increasing regulatory and political demands

for all business, including renewable power production and downstream activities. We welcome these changes but emphasize the need for a stable and predictable political alignment with the goals for 2030.

In addition to the general trends, singular events can lead to sudden changes in the regulatory framework. Climate change-related catastrophes like floods, forest fires and storms can contribute to immediate political measures reminiscent of Covid-19. These types of risk are difficult to evaluate but highlights the need for value chain awareness. The Northern European energy sector is interconnected, with exchange of products, manpower and power itself. In a complex, interdependent system the risk of unforeseen events occurring are increased.

Furthermore, in the new company structure Aneo will invest heavily in important capital-intensive infrastructure projects and is hence exposed to an increased risk of financial instability due to climate-related changes in policy. As such, Aneo is subjected to a substantial transitional risk through varying degree of unforeseeable political measures.

In essence, this means that Aneo and TrønderEnergi are incentivized to maintain a close relationship and dialogue with relevant policy-makers and regulators, and usher them to take immediate action. We are all benefitted by firm, foreseeable action to reach the 2030 climate goals.

¹⁷ For a detailed evaluation of our upstream and downstream activities, see the Appendix



¹³ Most relevant laws and regulations include Energiloven, Plant concessions, Agreements with landowners, Vannressursloven, Forskrift om IKvassdrag, Damsikkerhetsforskriften, and NVE guidelines.

¹⁴ The downstream activities were hence not subjected to criteria C onwards in Appendix A of the EU Taxonomy

¹⁵https://www.regjeringen.no/contentassets/a78e cf5ad2344fa5ae4a394412ef8975/nn-no/pdfs/stm202020210013000dddpdfs.pdf

¹⁶ https://climateactiontracker.org/global/temper atures/



Financial implication

If climate risks are to materialize, they will have a financial implication. However, the quantitative extent or magnitude of it is very challenging to ascertain. Rather, we've chosen to point to some potential situations that can affect the financial result.

Climate change will lead to increased amounts of extreme weather, and our facilities will hence be subjected to larger forces than the historic records indicate as of the writing of this report. Hence, climate-related risk has several potential direct implications worth highlighting.

- Reduced operating time due to weather conditions exceeding safety thresholds resulting in reduced income
- Increased wear and tear due to an increase in average applied force through wind, precipitation, temperature changes and other weather conditions, resulting in an

- increase in cost of maintenance and possibly reduced lifetime.
- Increased frequency of what we today view as freak accidents, leading to more damage and higher reparation costs, and possibly reduced lifetime.
- The increased international focus on renewable power production can reduce the export potential.
- Increased electrification may lead to an increase in demand which may lead to an increased power price.
- Summarizing the above-mentioned physical risks, they may lead to increased market risk, refinancing risk, operational risk, underwriting risk and credit risk.
- The need for systemic change to usher in the required green revolution may lead to regulatory changes that can drastically change the business climate for renewable power companies.





Appendices

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- Physical Risk
- Transitional Risk

Climate risk index

INDEX based on Recommendations of the Task Force on Climate-related Financial Disclosures Final Report (2017)

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4.3 Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	Page 9		



Physical Risk

				ario 1			Scenario 2					
ID	Short-term OEP/LTAM/HMS				ng-ter						ng-ter	
				OEP/		/HMS /dropov		LTAM/	/HMS	OEP/LTAM/HMS		
1												
2										Ŏ		
3												
4												
5												
6												
<i>7</i>												
9												
10												
11												
12												
13												
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16												
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18												
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20												
21												
22												
23												
24												
25												
26												
27												
28												
29												
ID	Identij	ficatio	n numb	er for	assess	ed pov	ver pla	nts.				
		portu						isk Cat			1	
		o chan				Optimal Energy Production					EP	
	Me	Risk	-			m Asset Management Safety Environment				LTAM		
		Risk				нealth	Sarety	Enviro	onmen	τ	н	MS



	Scena	Scenario 2								
ID	Short-term	Lo	ong-term		Short-term			Long-term		
טו	OEP/LTAM/HMS	OEP/	LTAM/HMS		OEP/LTAM/HMS		OEP/LTAM/HMS		'HMS	
	Wind Power (Revised assets)									
30										
<i>3</i> 1										
ID	Identification numbe	r for as	or assessed power plants.							
	Opportunity		Risk Categories							
	No change	nge Optim				mal Energy Production			0	EP
	Medium Risk		Lo	ong Ter	m Asset Management			nt	LT	٩M
	Risk		Health Safety Environmen				nment		Н	ИS



Transitional Risk

Poli	icy and Legal		Technology			
	Risks	Opportunities		Risks	Opportunities	
Tax regimes			Technology as business			
CO2e-emissions	New legislation results in increased cost from supply- chain due to Scope 3- emissions	Increased international competitiveness through early legislation	Hydrogen/ NH₃	Unpredictable demand for technologies in development – unpredictable technology R&D	Technology development reduces cost. Higher risk results in less competition and increased potential for larger market position	
Carbon prices	Increased cost from supply chain	Competitive advantage	Charging /batteries	Increased competition for products and natural resources	Technology development reduces cost. Higher risk results in less competition and increased potential for larger market position	
Renewable energy projects	New tax regimes (cost shift to producers or consumers)	New and improved financial incentives for renewable technologies	Wind power	Reduced public support and increased political opposition as a result	Technology development reduces cost and total footprint	
Regulations		Ŭ	Hydropower	Increased environmental requirements regarding minimum water flow	Higher demand for flexible renewable power sources	
Natural resource use Land use	Increased investment and operation costs through strict assessments requirements, reporting etc.	Increased effectiveness and competitive advantage	Solar Power	Increased land use awareness may increase opposition	Technology development may increase effectiveness and decrease land use and cost	
Power grid capacity	Increased electrification reduced power supply in our downstream activities	Power reducing technologies in our portfolio are increasingly competitive	Support tools			
Licensing process	New requirements, cost increase, longer process	Increased public pressure for policy may reduce licensing duration	EU research programs (e.g. IPCEI) and National funds	New competition may arise through supporting schemes	Increased focus on renewable technologies increases availability of capital	
Climate Adaptation Plans			Material availability			
Adaptation	Increasing levels of adaptation requirements increases cost and reduces value	Improved capacity to prepare for future changes and adapt accordingly		Increased competition, delays, and losses in global value chain	Increased focus on importance of renewable value chain reduces delay duration	
Liability	Higher potential for judicial action					



Geopolitics, national interests					
Dynamic political environment	Further increase in political uncertainty and occurrences resulting in unpredictability	The need for services supplied by renewable power companies increases on an international scale			
	Market			Reputation	
	Risks	Opportunities		Risks	Opportunities
Changes in Supply/Demand			Perception of local communities or society		
Smart control		Better cooperation between supply and demand		Decreased Public Support	Increased Public Support
Efficiency measures	Reduced power consumption	Increased power utility demand	Regulations and requirements		
New markets			Transparency and Credibility	New, stringent regulations requiring new public reports	
Emerging markets (H2,)	Market failure	Access to new markets	Partnership and value chain		
Power system	Cost increase, technology uncertainty	Emerging business (flexibility markets)	Up-stream emissions and footprint	Carbon intensive value chain may affect public view of the company	If able to decrease value chain emissions and footprints it may improve PR
Cost of					·
materials	Increased cost through lack of supply				
Finance					
Insurance	Increased risk premiums				
Capital availability	Lack of availability of capital				

