

To whom it may concern

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Avv. Francesca Palladi

Reggio Emilia, Oct. 23, 2026

MEMORANDUM N. 39/2026

Insight

Subject: Hyper-Depreciation 2026: Notification to the GSE of the Completion of Investments

1. In summary

Starting at 12:00 p.m. on October 15, 2026, companies that have received a positive confirmation notice may submit a notice of investment completion to the GSE. This is the final step to finalize eligibility for hyper-depreciation: without it, the benefit cannot be claimed.

Who	Companies that have received a positive response to their confirmation notice and have completed their investments
What	Notice of Investment Completion
How	Exclusively through the GSE "New Transition Plan 5.0" (NPTR5) platform, Customer Area at www.gse.it
When	From October 15, 2026, through November 15, 2028, once the investment has been completed

2. Regulatory context and stages of the procedure

The procedure for accessing hyper-depreciation is governed by the MIMIT-MEF Interministerial Decree of May 7, 2026, and consists of three successive notifications to the GSE. The launch of the third phase was ordered by the MIMIT Directorial Decree of October 14, 2026; at the same time, the GSE updated the NPTR5 platform guide and the operating instructions, publishing the completion notification form.

Phase	Purpose	Starting Date
1. Preliminary Notice	Reservation of the Benefit	June 12, 2026
2. Confirmation Notice	Confirmation of the Investment	July 21, 2026
3. Completion Notice	Certification of the Completion of the Investment	October 15, 2026 (12:00 p.m.) – deadline November 15, 2028

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3. What Does the Completion Notice Certify

This notification certifies that the investment has been completed (Art. 3, para. 3, Ministerial Decree of May 7, 2026). Completion is deemed to have occurred:

- for **tangible and intangible 4.0 assets**, upon successful interconnection;
- for **renewable energy (RES) facilities**, upon entry into operation..

Some key points to keep in mind:

- **Multiple completion notices** may be submitted, even if they refer only to a portion of the confirmed assets;
- The notice **may not concern assets other than those indicated** in the confirmation notice;
- The amount **may not exceed** the confirmed amount: the acquisition cost may only be reduced.

4. Completion, commissioning, and interconnection: three separate dates

For each asset, the actual completion date must be indicated; this date must fall between January 1, 2026, and September 30, 2028. This date does not necessarily coincide with the date of commissioning or interconnection: these dates must be determined and documented separately.

Event	What it indicates	Reference
Completion	Industry 4.0 Assets: date the investment was made in accordance with accrual-based tax criteria. Renewable Energy Systems: date of completion of work	Art. 109, paras. 1–2, TUIR; Art. 1 of Ministerial Decree of May 7, 2026
Commencement of Use	The asset becomes operational in the company's business activities	This determines when the benefit takes effect
Interconnection	Connecting Industry 4.0 assets to the production management system or the supply network	A prerequisite for signaling the completion of Industry 4.0 assets

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The purchase or delivery of the asset, on its own, is not sufficient to prove that the investment has been completed.

5. Documents to Prepare

Before accessing the platform, you must have three sets of documents ready.

Document	Contents	Who issues it
Invoices and/or lease agreements for the full amount	Details of expense documents covering at least 100% of the eligible cost of each completed asset	Suppliers/ leasing
Certified Technical Report (Art. 6 of the Ministerial Decree)	Technical specifications of the assets (Annexes IV and V, Law 199/2025), interconnection to the company's system or the utility grid, requirements for renewable energy systems for self-consumption	A registered engineer or industrial technician, or an accredited certification body (certification with a technical analysis). In the agricultural sector, this may also include an agronomist, forester, agricultural technician, or agricultural specialist with a college degree. Appropriate insurance coverage is always required.
Accounting Certification (Art. 7 of the Ministerial Decree)	Actual Incurrence of Expenses and Their Reconciliation with the Accounting Records	Entity responsible for the statutory audit (Legislative Decree 39/2010); for companies not subject to this requirement, an auditor or auditing firm listed in Section A of the registry. In all cases, with adequate insurance coverage

The submission must include the document references and the details of the professionals who issued them: expert reports and certifications should not be uploaded to the platform but must already be in the company's possession at the time of submission and retained for any potential audits.

Three important clarifications:

- **No exemption for assets valued below 300,000 euros.** The Ministerial Decree of May 7, 2026, does not provide for a simplification of the old 4.0 regulations: an appraisal is required even for lower-value assets.
- **A single appraisal for multiple assets.** The decree does not require an appraisal for each asset, but it also does not regulate a cumulative appraisal: if a single document is used, it must allow for the identification and verification of the requirements for each individual asset.
- **Who certifies the costs.** Being a certified public accountant is not enough: one must be registered in Section A of the register of statutory auditors and meet the independence requirements set forth in Article 7.

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Expert reports, certifications, invoices, shipping documents, and any other evidence needed to demonstrate entitlement must be retained (Art. 9, para. 2, Ministerial Decree): failure to retain such documents is grounds for forfeiture.

6. Log in to the platform and start the case

Submissions are made exclusively via NPTR5 in the Customer Area of the GSE website.

- **Log in** with SPID, CIE, or your credentials. Please note: **SPID is required to sign and submit** the communication and to grant any signature authorization.
- From the “**View Communications**” menu, locate the box containing the case’s unique code.
- Click on “**Completion Notification**”: the system creates a request linked to the main case (e.g., NPTR5-123456-CC0001).
- The main case changes to the “**Completion in Progress**” status and remains there until all confirmed assets have been reported as completed.

Those who wish to permanently withdraw from the incentive program must instead use the “**Withdraw Notification**” button.

7. Filling Out the Form, Step by Step

The procedure consists of twelve steps. Many fields are pre-filled with data from the confirmation notice and can be edited within the specified limits.

#	Step	What to do	Please note that
1	Production Structure Data	Verify the personal and property registry information inherited from the confirmation	If “Section” or “Primary Sub” is missing, enter “NP”
2	Operator Profile	Verify the information and indicate whether the signature is that of the legal representative, owner, or manager, or of a delegate	The fields in gray are taken from the registration in the Customer Area
3	Grant Authorization	Only if a delegate signs: the system generates the power of attorney and notifies the legal representative by e-mail, who then grants it by logging in with SPID	Any subsequent change to the information invalidates the authorization: it must be reissued
4	Declarations	Confirm your selection of renewable energy systems and check all the statements	A “Yes” in the confirmation can become a “No” (renewable energy projects

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#	Step	What to do	Please note that
			are reclassified as “to be completed”); a “No” cannot be changed
5	Expenses: Attachments IV and V	For each asset, indicate its status: “completed” or “to be completed”; indicate whether it is leased	No new assets; cost can only be reduced; lease data and 20% down payment are read-only
6	Renewable Energy System Costs	As in Step 5, for renewable energy systems	Visible only if the renewable energy investment has been declared in the confirmation and confirmed in Step 4
7	Final Data and Summary	Check the totals by year (2026, 2027, 2028) for completed projects only; fill out the self-consumption section (if renewable energy), and provide the information for the appraiser/certifying body and the auditor	Remote Self-Consumption: You'll Need a POD, a CENSIMP Code (format IM_0123456), and a Market Zone
8	Invoices – Lease Confirmation	Viewing only the documents already included in the confirmation	–
9	Invoices – Lease Completion	Enter invoices and/or lease agreements for each completed asset	Minimum coverage of 100% of the eligible cost: advance payments already recorded in the confirmation also count. Amounts are net of VAT, unless the VAT constitutes a cost
10	Generating Documents for Signing	Download the DSAN preview, just to check it out	Do not upload it: the signature is applied via SPID when the form is submitted. After this step, the data can only be modified using “Edit Completion.”
11	Attachments	No attachments required: Click “Save and Continue”	When scrolling back, the data is view-only
12	Summary	Click “Submit Report”	Once sent, the message can no longer be edited

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8. After submission: results and follow-up

Within 24 hours of submission, the platform generates a receipt; the notification remains viewable (but cannot be edited) under “View Notifications” > “View Completion”; the signed DSAN and the receipt can be downloaded from “Attachments and Completion Receipts.” Within 10 days of receiving the submission, the GSE will notify you of a positive outcome or request any missing data, which must be provided within 10 days. Once the additional information is received, the GSE will issue a decision within another 10 days: either a positive outcome or a determination of ineligibility.

9. Eligibility for the Benefit: Approval and Effective Date

Please note: If the company fails to submit the notification or supplementary information within the prescribed time limits and in the prescribed manner, the procedure will not be completed and the benefit cannot be claimed (Art. 3, para. 5, Ministerial Decree of May 7, 2026).

20-day extension. The November 15, 2028, deadline is extended by 20 days only if the GSE requests additional documentation. This is not a general extension available to the company.

Use of the Benefit. Simply submitting the notification is not sufficient to claim the surcharge: eligibility is contingent upon the GSE’s approval of the specific completion notification (Art. 4, para. 1, Ministerial Decree). The receipt merely confirms transmission; the approval certifies that the verification has been successfully completed.

The surcharge applies starting from the tax period in which the completion notice is submitted, provided that the asset became operational during that same period.

For example. Solar-powered business: equipment completed, operational, and connected to the grid in September 2027; notification submitted in October 2027, with a subsequent positive outcome. The effective date is 2027.

Practical Implication: For assets completed and interconnected in 2026, those who wish to begin operations as early as 2026 must submit proof of completion by December 31, 2026 (for calendar years).

Open Case. The decree does not expressly address what happens if a positive result is received after the end of the fiscal year or after the tax return has been filed.

The Firm is available for any clarifications.

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