This analytical study focuses on the problems of state financial regulation of economic transformations (within the framework of the practical implementation of the Concept of regulation of investment activity in the conditions of the market transformation of the Ukrainian economy), namely tax incentives for energy efficiency projects in Ukraine. In general, the attractiveness of energy efficiency investments is due to a number of reasons. It is believed that saving a unit of energy is about two times cheaper than producing it. Therefore, the energy needs of end users can be met not only through the construction of new generating capacity, but also through the rational use of an existing resource. The state and dynamics of the modern market of energy resources both in the world scale and within Ukraine are analyzed, and it has been discovered that the potential of the energy efficiency market is extremely voluminous and interesting for different groups of investors. The study of Ukraine's legislative framework has made it possible to clearly define the concept of energy efficiency and to highlight which projects can be considered energy-efficient. It is noted that the state is actively developing and implementing a policy to increase energy consumption savings both among private individuals and among enterprises that are implemented at the state level by a specially created
Energy Efficiency Fund. As a specific tool for stimulating energy efficiency projects, the author proposed to use tax incentives, which is one of the financial instruments of the state's investment policy.

Key words: macroeconomic planning, investment process, economic development strategy, regulatory policy of the state.

Introduction. Macroeconomic instability and significant regional differentiation are the main characteristics of the economic development of Ukraine over the past decade. This greatly complicates the forecasting of macroeconomic trends and makes the development of long-term economic programs and strategies impossible. Therefore, the analysis of macroeconomic indicators and the identification of factors that affect them, remains not only relevant, but also extremely necessary. Successful reforming of the Ukrainian economy, above all, depends on the correct determination of priorities and directions for improving macroeconomic policies. The essence of the problem lies in the low efficiency of its funds, the lack of influence on real economic indicators: the growth rate of GDP, the level of employment, the volume of investments, etc.

It should be noted that the concept of sustainable development put forward by the world community is based on the synthesis of experience mainly from countries with a developed market economy with a high level and quality of life and having a developed production, social and environmental infrastructure. Therefore, today it is only acceptable for them to limit the consumption of resources on the basis of low rates of economic growth. In the meantime, our country cannot afford the luxury of limiting itself to stabilizing the pace of economic growth in the near future, because it needs accelerated development [1, p.35].

The development of fundamentally new tasks in the socio-economic development of urbanized territories requires qualitatively new approaches
to the organization of environmental management based on biosphere compatibility.

In the general complex of problems of greening, a special place is occupied by the greening of scientific and technological development. In other words, a radical restructuring of the economic basis is needed on the principles of the maximum possible interdependence of the links of the cycle of matter and energy [2, p.18].

In reality, this is a transition to an ecological-economic balance, which implies significant changes in the content of methods and forms of regulation of the economic and scientific-technological basis, in which the economy, organization and management of a regional economic complex should be considered from eco-innovation positions that are mainly not related to the disposal of harmful garbage, and with the development and execution of new technologies that do not allow these garbage.

Such a methodology is based on the principles of a systems approach in accordance with which “society-technology-nature” is considered as a single system. As you know, economic policy is a system of legislative, economic, social and psychological guarantees that provides all able-bodied citizens with conditions for improving their well-being through personal labor participation, economic independence and entrepreneurship [3, p.42]. Therefore, in the current conditions of the formation and development of a market economic system, modern regional policy should be based on the main priorities of the country's socio-economic development for the long term, when human potential and labor potential, in particular, becomes the basis of the state innovation policy.

**Aim and tasks of the paper.** The concept of regulation of investment activity in the conditions of the market transformation of the economy as the priority areas of priority investment for Ukraine provides: development of the fuel and energy complex and the introduction of energy and resource-
saving technologies. The purpose of the article is to develop theoretical and methodological principles of functioning of the system of public finances in the conditions of emerging markets and to develop conceptual provisions for modernizing the state tax policy in the aspect of investing in the implementation of energy efficiency programs.

**Main findings.** Improving energy efficiency is one of the key objectives of the global economy, due to limited resources and the ever-growing demand for them. It is possible to achieve results in the field of energy efficiency both by saving energy consumption and by creating energy-efficient technologies and equipment [4, p.14]. Currently, high energy efficiency is considered as a key factor in ensuring the competitiveness of individual companies and the national economy as a whole. In most developed countries, there is an active state support aimed at improving energy efficiency, which is reflected in the development of energy efficient technologies, equipment and alternative energy sources. In the current conditions of the development of the world economy, concentration on stimulating energy efficiency seems to be one of the main ways of bringing the national economy to the trajectory of economic growth. However, in the absence of government support and the relative cheapness of energy resources, economic actors tend to under-invest in the development of their own energy efficiency.

Energy efficiency is associated not so much with a decrease in resource consumption, but rather with an increase in the efficiency of this consumption, but in practice energy efficiency always goes alongside energy conservation, and the definition of energy efficiency is inextricably linked with measures to reduce the use of energy resources.

In a broad sense, energy efficiency is the effective (rational) use of energy resources, the achievement of economically viable efficiency of using fuel and energy resources at the current level of development of
engineering and technology and compliance with environmental requirements.

In a narrow sense, energy efficiency is a reduction in the production of consumed energy and resources through the use of new and more productive equipment, the optimization of existing energy consumption systems, the installation of metering systems, management, control and the use of secondary energy resources.

Thus, energy efficiency contributes to increased profits, gives an advantage over competitors, creates a positive image of the company, and also contributes to the protection of the environment. In the most general sense, energy efficiency is reflected in the reduction of energy consumption to perform the same amount of work: lighting, heating, the production of any product, etc. For the population, it means less spending on utilities, for the country - saving resources, primarily export gas and increasing industrial productivity, for the environment - limiting greenhouse gas emissions to the atmosphere, for energy companies - reducing fuel costs and unreasonable spending on expensive construction.

According to World Energy Investment 2018, which was prepared by the International Energy Agency (IEA), global energy efficiency investments rose by 3% ($ 236 billion) amid a general reduction in energy investments by 2% to $ 1.8 trillion. How indicative is this fact? We will be restrained optimists. According to the forecasts of the same IEA, by 2022 energy efficiency investments should increase to $ 300 billion. In general, the dynamics of investments in the energy efficiency sector slowed down by 6% compared to the previous year (in 2016, growth was 9%, $ 231 billion). The indicator itself is averaged. For example, if the world invested in energy efficiency of buildings and facilities by 3% more ($ 140 billion, in transport by 11% more ($ 40 billion), then in the field of industry, on the contrary, there is a reduction of investments by 8% (up to $ 35 billion) [5].
The potential of Ukraine to attract investment in this area is huge. The energy intensity of the Ukrainian economy is 3 times higher than the European average. To achieve the European level of energy efficiency, according to various estimates, Ukraine needs from $ 25 to $ 60 billion of investments. In the sector of housing, production and supply of thermal energy, the public sector can improve energy efficiency by 50-60% [4, c.18].

In order to reinforce the potential for saving (and profitability for investors) with institutional capabilities, a regulatory framework is being created in the country that will launch a full-scale energy efficiency market in Ukraine.

For example, this year the Law “On the energy efficiency of buildings” [6] has already entered into force (since July 1, 2019 most state and municipal buildings will be required to undergo energy certification), the Law “On commercial accounting of thermal energy and water supply” [7] is in effect, to provide a total accounting of energy resources, and in accordance with the Law “ About the energy efficiency foundation” [8] around the beginning of 2019, the state mechanism of grant support for the thermal modernization of the residential sector can be launched.

Obviously, against the background of the general needs for energy efficiency investments in Ukraine, this is a drop in the ocean. However, if, thanks to state activity and a favorable regulatory environment, projects in the residential and public sector show good results with minimal risks, private foreign investors will gradually catch up.

Tax incentives for improving energy efficiency is an action on the part of the state aimed at enhancing, through tax policy, the taxpayers' economic interest in the efficient use of energy resources, achieving economically viable efficiency of their use by using new and more productive equipment and innovative technologies, optimizing existing management systems, control and use of secondary energy.
Based on the analysis of tax incentives for energy efficiency, we can conclude that basically there is a description of foreign experience on this topic and an analysis of specific tax incentive instruments. However, such fundamental issues as:

- What to stimulate - demand or supply for energy efficient technologies and equipment?
- Who to stimulate - energy producers, suppliers or consumers?
- How specifically should be stimulated - at the expense of tax incentives aimed at improving energy efficiency, or at the expense of tax coercion measures to save energy, in particular taxes on energy consumption?

Tax concessions, as well as taxes on energy consumption, aimed at achieving the goals of increasing energy efficiency, can affect the market demand for innovative developments in this area, since the use of such technologies by companies is directly dependent on the costs of companies. In a competitive environment, companies aim to maximize profits, i.e. costs and prices of finished products can determine what and how to produce. K. J. Arrow was the first to describe the effect of this phenomenon on technological changes in his hypothesis of stimulating innovation: “a change in the relative price of the production factor is in itself a stimulus for the invention, and a special kind of invention aimed at the economical use of the factor that has become relatively expensive” [1, p. 47].

Therefore, in order to continue to receive the maximum profit, the company will have to change the cost-income ratio in order to get maximum revenue with minimum cost. Such savings stimulate not only the improvement of production processes, but also changes the priority towards innovative development, which must also take into account the costs, in particular, tax, associated with the production of goods or services. From a
theoretical point of view, this phenomenon is also applicable to energy conservation and the role of tax incentives in this case is obvious.

For example, energy consumption taxes can define a clear additional value and, thus, lead to “forced” innovations, since taxes change the investor's profit margin. With an appropriate system of tax incentives for energy efficiency, the recoupment of investments in energy efficient processes is ensured, firstly, by future income from energy savings and, secondly, by hypothetical incomes in the form of lower deductions for the corresponding taxes, or through the use of tax incentives.

**Conclusions.** Tax incentives are designed to affect the inefficient use of energy or energy carriers. In trying to make a difference, tax breaks or taxes should create more incentives for innovation in energy efficiency, which is one of the main goals. Obviously, such tax instruments will affect competition. In particular, the tax on the unit of energy consumption should have a greater impact on large sources of such consumption than on those producers who have found an opportunity to receive the same volume of output with less energy use. An energy-intensive producer is in a competitively disadvantageous situation precisely because it creates more negative consequences for society. This impact should apply to interchangeable and additional goods. It is this competitive impact that creates incentives to search for less energy-intensive methods and methods of production.

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