

COMPETITIVE MAC FRAMEWORK STAKEHOLDER ENGAGEMENT

Submissions by 30/09/25
See Page 6 for full details

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Summary

MARA is designing a Framework to underpin the competitive Maritime Area Consent (MAC) process. The Framework will use site-specific criteria to assess applications when a site has been identified for a call for a competitive MAC. This stakeholder consultation outlines the design decisions that MARA has identified as preferable and suggests relevant criteria to inform the assessment of competitive MACS for the ORE sector.

MARA has determined that the purpose of this ORE competitive MAC is to assist Ireland in pursuing its climate and energy ambitions, whilst benefitting its people and the environment. Its primary objective, therefore, at this point in time is the timely delivery of Offshore Renewable Energy (ORE). As Ireland begins to deploy ORE in the maritime area, it is recognised that this objective may evolve and the draft Framework will be designed to be flexible in this regard.

MARA appointed Baringa Partners LLP (Baringa) to advise on the design of the Framework. As part of its advice, Baringa carried out an assessment of relevant international seabed allocation processes and criteria used.

Below, is a summary of all options considered as part of the design.

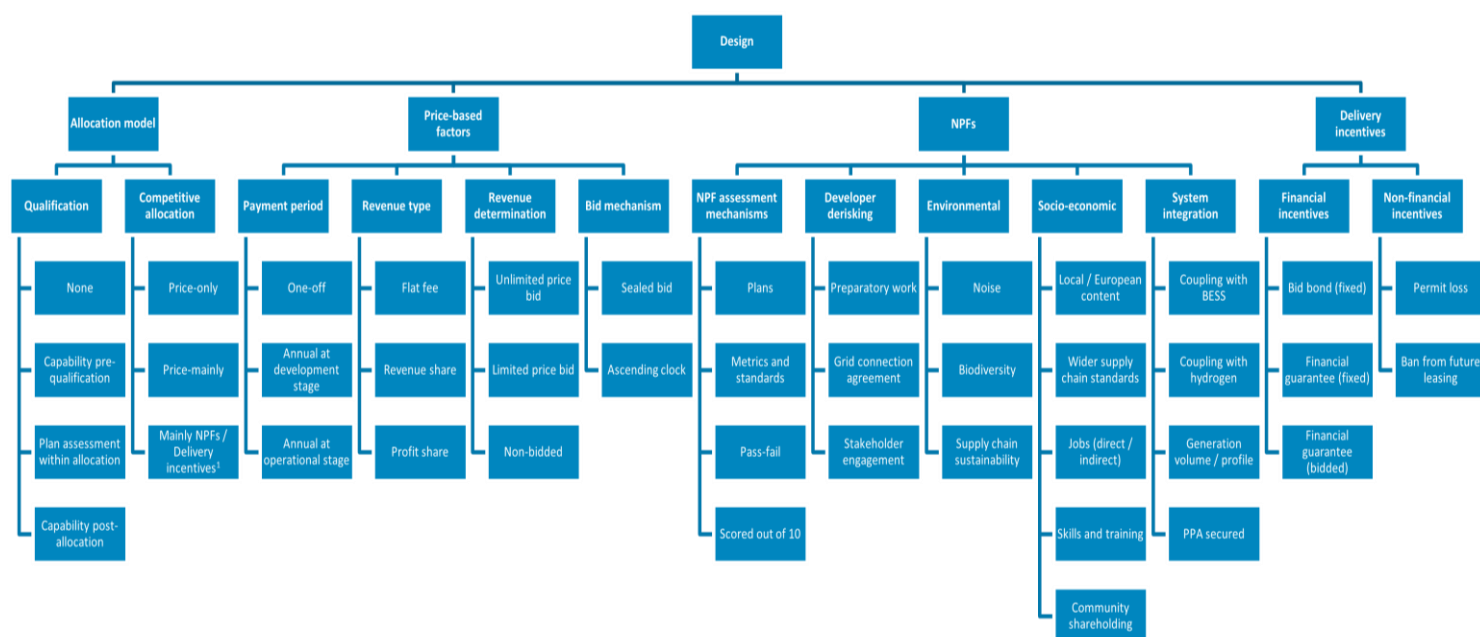


Figure 1: Design decisions framework with initial recommendations (does not represent final assessment)

Consultation context

The Maritime Area Planning Act 2021 (MAP) Act established MARA as the national regulatory authority for Ireland's Maritime Area. The Act defines the maritime area as the area of the State extending from the high water of ordinary or medium tides of the sea to the outer limit of the continental shelf. MARA is, therefore, the regulator for the area stretching out to 200 nautical miles.

Where development permission is required for a development, a person cannot apply or obtain such permission, unless they are the holder of Maritime Area Consent (MAC) for the occupation of the area to be developed.

A holder of a MAC is obliged to pay MARA an annual levy, based on the levy framework established in accordance with the MAPA 2021.

Competitive MACS – Legislative basis

The bases for a competitive MAC are set out in Sections 93 and 103 of the MAPA 2021.

Section 93 enables MARA, with the consent of the Minister for Public Expenditure, NDP Delivery and Reform, to use a competitive process for the levy or levies to be paid by the holder of a MAC where –

- (a) there are, or expected to be, two or more MAC applications and MARA is of the opinion that the grant of one or more of those applications would exclude the possibility of granting one or more of the other applications,
- (b) the part of the maritime area concerned is the subject of a Maritime Spatial Plan (MSP) or Designated Maritime Area Plan (DMAP), or
- (c) both of the above.

Section 103 gives MARA a more general power to give notice that it intends to invite MAC applications for a maritime usage to be undertaken in a manner consistent with any MSP or DMAP. In accordance with this Section, MARA may use a competitive process (which may be, or include, the competitive process for levies, as provided for in Section 93) to determine which application will be granted. In issuing such a notice MARA may specify the weighting that applies in respect of –

- (i) each of the criteria contained in Schedule 5 to the Act to which MARA must have regard to when considering an application and
- (ii) extra criteria that MARA may specify in the notice. (To note – any extra criteria specified in the notice cannot be inconsistent with the criteria contained in Schedule 5).

In summary, a competitive MAC can be based solely on levy criteria, criteria contained in Schedule 5 of the Act, other criteria or a combination of all three.

In the second part of this consultation “levy criteria” are reflected as Price-Based Factors and “other criteria and Schedule 5 criteria” are reflected as Non-Price Factors.

Role of Competitive MAC in ORE – EU and National Government Policy

The deployment of offshore wind energy is at the core of delivering the European Green Deal and ensuring Europe’s competitiveness and security of energy supply. In the past five years, the

EU has published and adopted several policy documents to boost offshore wind deployment. Notably, recent policies impose legally binding obligations on Member States, unlike earlier strategies which were non-binding. Of note are –

- The updated EU Offshore Renewable Strategy which puts in place 60 GW by 2030 and 300 GW by 2050 targets for offshore wind at EU level;
- RePowerEU, the EU Commission’s plan to end reliance on Russian energy, includes an amendment to the of the Renewable Energy Directive (RED) to accelerate renewable deployment through better planning and faster permitting and
- Net Zero Industry Act, adopted in 2024 to foster competitiveness in the EU Net Zero Industry.

At a national level, in response to the escalating global climate emergency and in order to meet Ireland’s legally binding objective of a 51% reduction in greenhouse gas emissions by 2030, the Irish Government aims to achieve 5GW of grid-connected offshore wind by 2030. To accelerate the achievements of these targets, the Government determined that Ireland’s first offshore renewable energy DMAP would be situated off the South Coast of Ireland. This is further reiterated in the now Department of Climate, Energy and Environment (DCEE) Offshore Renewable Energy Future Framework Policy Statement 2024 -

[<https://www.gov.ie/en/publication/0566b-future-framework-for-offshore-renewable-energy/>] which signposts a plan-led approach for ORE development 2030 -2050. The Framework contains a specific priority action for MARA to explore the feasibility of implementing a competitive MAC framework to complement this plan-led approach.

Following on from this, in October 2024, DCEE published the first Offshore Renewable Energy DMAP for the South Coast of Ireland.

[The South Coast Designated Maritime Area Plan for Offshore Renewable Energy \(SC-DMAP\)](#)

The first area within the South Coast DMAP, Tonn Nua (Area A), will be brought to auction in 2025 under the ORESS scheme, procuring 900 MW of capacity. The award of MACs by MARA for future ORE development within Maritime Areas B, C, D are to be granted according to timing, methodology and processes to be determined by the State. The Minister for Climate, Environment and Energy recently announced the commencement of work on the preparation of a National ORE DMAP to support Ireland’s longer-term ambitions for the development of 20GWs of ORE by 2040 and 37GWs by 2050.

Development of a Competitive MAC Framework for the ORE Sector

In response to Government policy on ORE, MARA has appointed Baringa to advise on the design of a flexible MAC allocation framework that will allow MARA to ensure that the seabed is occupied optimally by offshore wind developers. This framework is essentially a “toolbox” which will enable MARA to address the most important issues in the assessment of competitive MACs.

The competitive MAC will also be a tool that will be available to the Government to assist in the development of ORE in the maritime area, along with route to market policy and other drivers.

The use of the tool will be a function of overall government policy with respect to offshore renewables and climate policy.

When the Government confirms the sites to be released by MARA in the South Coast ORE DMAP and subsequent national DMAP, the framework will enable MARA to choose site- and objective-specific criteria for each call.

Government policy and ORE market conditions at the time of any call will influence what criterion or combination of same will be applied to the call. It is important to note that an indicative scoring matrix of chosen allocation criteria will be developed by MARA. However, specific weightings and scoring will be determined at the stage of design of each call.

Each call will also be subject to stakeholder engagement.

To date, seabed for offshore wind development in Ireland has been allocated through the following non-competitive processes –

- Open door mechanism for Phase 1 projects, which then bid into a two-way contract for difference (CfD) process (ORESS 1), or have an alternative route to market and
- Exclusive right to apply for a MAC granted to the successful bidder of the next CfD auction, ORESS Tonn Nua.

The new competitive MAC framework will ensure a fair and transparent process for future projects and that key policy objectives are met in a context where future capacity may not necessarily be delivered with ORESS support, for example merchant/CPPA projects. Each MAC allocation round will be guided by a detailed design with reference to the overarching framework. While MARA recognises that offtake opportunities, whether public (national grid) or private, are a key consideration for developers, it does not advise on these directly. Accordingly, MARA is seeking feedback specifically on the MAC allocation process and wants to ensure that such MAC allocation process is compatible with a range of offtake options.

As mentioned above, MARA has determined that the purpose of this ORE competitive MAC is to assist Ireland in pursuing its climate and energy ambitions, whilst benefitting its people and environment. Its primary objective, therefore, at this point in time is the timely delivery of ORE. To deliver on this MARA has identified the following secondary objectives:

- Cost Effectiveness for consumers
- Social & environmental value creation
- Innovation
- Supporting a secure and resilient energy system

Baringa were contracted to support MARA's decision-making process by carrying out the following analysis –

- A desktop review of international best practice in relation to competitive seabed rights,
- A review of existing and emerging policy and guidance from the European Commission in this area,

- An assessment of how the levy framework should be presented in a competitive call for MAC applications (levy criteria),
- An assessment of the criteria contained in Schedule 5 of the MAP Act and consideration of what, if any, should be given a higher weighting in considering an application for a competitive MAC,
- A review of Non-Price Factors (NPFs) best practice used internationally in competitive seabed rights regimes and
- An assessment of the merits of each of the following –
 - A call for a MAC on the basis of price-based factors,
 - Attaching a weighting to the criteria in Schedule 5 of the Act,
 - A call for a MAC on the basis of non-price factors, or
 - Any combination of the above.

This stakeholder consultation summarises MARA's view, which has been supported by the findings of the Baringa study.

International best practice

In designing our framework, we have gathered evidence from key international offshore wind markets –

- Germany
- UK: England, Wales and Northern Ireland
- UK: Scotland
- France
- Netherlands

Each of these jurisdictions took different approaches to seabed leasing – some using price only, some using NPFs and others using a combination of both. For each jurisdiction, Baringa assessed the following –

- The degree to which risk allocation between developer and Governments vary across different auction designs
- Pre-qualification regimes
- The use of sealed bids and ascending clock auctions
- The emphasis and weighting of NPFs across markets with maximising project deliverability and achieving wider benefits being the two main goal of NPFs.

Assessment of Schedule 5 of MAPA 2021

Schedule 5 of the MAPA 2021 contains criteria that MARA must have regard to when assessing a MAC application. The Act also enables these criteria to be assessed competitively. Together with Baringa, MARA assessed each of the criterion and determined which ones may form part of

the criteria used in the competitive framework, and how. The following elements from the Schedule 5 criteria have been identified as suitable foundations for potential assessment criteria -

- Nature of occupation
 - Which could include technology deployed
- Public interest
 - Social
 - Economic
- Preparation
 - Preparatory work undertaken
 - Stakeholder engagement undertaken

Consultation overview

Drawing on the Baringa study, MARA has identified a number of options in relation to the design of the Framework. The consultation sets out the various options under the following parts of the design –

- Allocation Model
- Price-Based Factors
- Non-Price Based Factors (NPFs)
- Delivery Incentives

MARA has assessed all options presented to them by Baringa and has selected preferred options. These preferences are set out in the second part of this consultation.

How to make a submission

The deadline for making a submission is **17.00 on 30 September 2025**.

Please make it clear to us on whose behalf this submission is being made.

Please send your submission by email to consultation@MARA.gov.ie with the subject line “Competitive MAC Consultation” or by post to:

Competitive MAC Consultation

Maritime Area Regulatory Authority (MARA)
2nd Floor
Menapia House
Drinagh Business Park
Drinagh
Wexford
Y35 RF29

Data Protection

We are committed to engaging with stakeholders in a clear, open and transparent manner. Any person or organisation can make a submission in relation to this consultation. We will consider all submissions and feedback before we publish the final version of the Competitive MAC Framework.

Your response to this consultation is subject to:

- the Freedom of Information Act 2014 (FOI)
- the Access to Information on the Environment Regulations 2007-2018 (AIE)
- the Data Protection Act 2018

Analysis and Publication of responses

All responses received will be shared with a 3rd party company that have been engaged to analyse the contents of submissions.

We intend to publish the contents of all submissions received to our consultations on our website. We will redact (remove) personal data before publication.

Please indicate any sensitive information

In responding to this consultation, clearly indicate where your response contains any information which you would not wish to be released under FOI, AIE or otherwise published. This can include:

- personal information
- commercially sensitive information
- confidential information

Read our Data Privacy Notice

We would like to draw your attention to our Data Privacy Notice (<https://www.maritimeregulator.ie/privacy/>) which explains:

- how and when we collect personal data
- why we do so
- how we treat this information
- your rights in relation to the collection of personal information
- how you can exercise those rights

Glossary

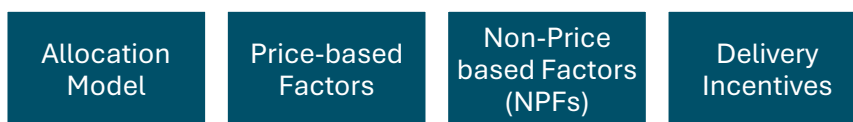
AIE	Access to Information on the Environment
AO	Appel d'Offres (France) Tender Auction
BESS	Battery Energy Storage System
BSH	<i>Bundesamt für Seeschifffahrt und Hydrographie</i> (Germany) Federal Maritime and Hydrographic Agency
CfD	Contract for Difference
COD	Commercial Operation Date
DE	Deutschland (Federal Republic of Germany)
DCEE	Department of Climate, Energy and Environment
DMAP	Designated Maritime Area Plan
FOI	Freedom of Information
FR	France
HKW	<i>Hollandse Kust West</i> Wind Farm Zone
IE	Republic of Ireland
IJV	<i>Ijmuiden Ver</i> Wind Farm Zone
LR	Leasing Round
MAC	Maritime Area Consent
MAP Act	Maritime Area Planning Act 2021, as amended
MARA	Maritime Area Regulatory Authority
MPPS	Marine Planning Policy Statement
MSP	Maritime Spatial Plan
NDP	National Development Plan
NL	Kingdom of the Netherlands
NPF	Non-Price Based Factor
ORESS	Offshore Renewable Electricity Support Scheme
ORE	Offshore Renewable Energy
PPA	Power Purchase Agreement
PQQ	Pre-Qualification Questionnaire
UK	United Kingdom of Great Britain and Northern Ireland

COMPETITIVE MAC FRAMEWORK

CONSULTATION QUESTIONS

Introduction

Baringa has identified a number of options in relation to the design of this Framework. The consultation sets out the various options under the following parts of the design –



In addition, we have included a summary of the overall approach taken taken. Under each part, the following questionnaire sets out all the options considered and MARA's preferred approach. You will be asked if you agree with MARA's consideration and, if not, to outline why not.

In evaluating all options outlined in this consultation document, MARA considered how much each one contributed to the primary and secondary objectives. Each option was also evaluated against the following design principles -

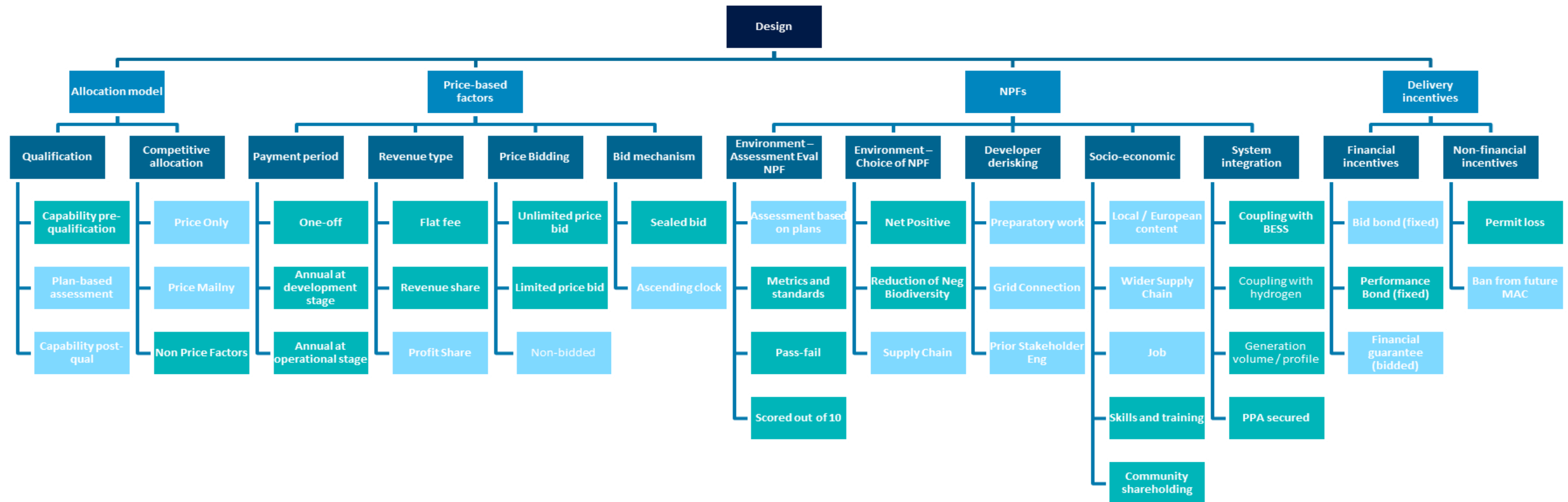


In addition, all options were assessed on the basis of the past experience and outcomes delivered in the following jurisdictions –

- Germany (DE)
- UK: England, Wales and Northern Ireland
- UK: Scotland
- France (FR)
- Netherlands (NL)

MARA acknowledges the excellent stewardship of this project to date by Baringa.

Section 1 - Overall Approach



Key

- xx Preferred Option
- xx Not Preferred Option
- xx Section Headings

Design Options

The graphic above summarises the design options considered across all components of the draft competitive MAC framework and highlights MARA's preferred options, which are explained in more detail below. MARA believe that this is comprehensive model.

Do you agree? If not, why not?

Section 2 - Allocation Model

In its assessment of an Allocation Model, MARA looked at options under the following headings-

1. Pre-qualification
2. Competitive allocation model

1. Pre-qualification

MARA considered the following pre-qualification criteria –

	None	Capability pre-qualification	Plan-based assessment in allocation	Capability post-qualification
Description	No pre-qualification	<p>Separate pre-qualification round</p> <p>Checking simple financial and technical criteria</p>	<p>No separate pre-qualification round</p> <p>Qualifying assessment primarily based on delivery plans submitted by developers within allocation round</p>	<p>No separate pre-qualification round</p> <p>Checking simple financial and technical criteria of provisional successful bid within allocation round – exclude and move on to next if fails</p>
Examples in other jurisdictions	DE : non pre-dev ¹ DE : pre-dev	FR: AO6-8 UK: Round 5	NL: IJV & HKW UK: ScotWind	No example

¹ Since 2023, Germany uses two different frameworks to allocate offshore wind areas depending on the level of site identification but both including grid connection up to the offshore substation. **Pre-developed sites** – with prior site investigation from the Federal Maritime and Hydrographic Agency (BSH) auctioned based on a mix of price (60%) and qualitative criteria (40%). **Non-centrally pre-developed sites** – with no prior site investigation auctioned based on price only.

Preferred option: Capability pre-qualification

MARA favours a light-touch financial requirement (e.g. minimum threshold) for pre-qualification. In reaching this decision we considered that having a qualification on capabilities is a relatively simple step that should enhance deliverability without creating an undue burden on bidders or MARA. In addition, while assessing only the provisional winner as part of the allocation process this may save time and reduce administrative burdens on MARA, this must be balanced against the risk of creating uncertainty for bidders regarding their qualification status.

Do you agree? If not, why not?

2. Competitive allocation model

MARA considered the following competitive allocation criteria –

	Price only	Price mainly	Non-Price Factors (NPFs)/delivery incentives mainly
Description	Clearing purely on financial bid with other assessment only being used for pre-qualification	Clearing on the basis of financial bid and NPFs, with financial bid comprising >50% of score	Clearing on the basis of financial bid and NPFs, with NPFs comprising >50% of score
Examples in other jurisdictions	DE: non pre-dev UK : Round 5	FR: AO6-8 DE: pre-dev	NL: IJV Alpha & Beta NL: HKW VI & 7 UK :ScotWind

Preferred option: NPF/delivery incentives mainly

MARA strongly favours NPFs/delivery incentives mainly for the first round of competitive MACs. With deliverability prioritised and other objectives encompassing different forms of value, focussing mainly on NPFs and delivery incentives is most appropriate to MARA's objectives. A focus on achieving high prices could lead to threats to project viability in adverse conditions, while the dynamics of cost effectiveness for consumers vary depending on the funding model. As you will see in the Section 3 of this questionnaire, it is MARA's intention that the design of the NPFs will be kept simple to avoid creating any burdens that could threaten deliverability. It is acknowledged that a shift towards price may be necessary in the future, but MARA believes that focussing on NPFs is preferred for getting capacity built and built sustainably.

Do you agree? If not, why not?

Section 3 -Price-based factors (PBFs)

Notwithstanding MARA's preference for NPFs, it is acknowledged that PBFs will have a role to play in the Framework². Therefore, assessed PBFs headings-

1. Payment period
2. Revenue type
3. Price Bidding
4. Bid mechanism

1. Payment period

MARA considered the following payment options for the design of PBFs-

	One-off payment	Annual levy at development stage	Annual levy at operational stage
Description	One-off payable straight away after MAC award	Annual fee payable between MAC award and COD	Annual fee payable from COD
Examples in other jurisdictions	DE:pre & non pre-dev UK: ScotWind NL: HKW	UK – LR5	DE:pre & non pre-dev FR (tax on use of seabed) NL: IJV

² All PBFs are considered in the context of MARA's levy framework, to which any competitive process involving price will apply.

Preferred option: All options

MARA recognises that all three options can present benefits. One-off fees can help avoid disincentives to continue development between MAC award and COD. Fees at development stage would provide an incentive for speed of delivery as developers would want to avoid additional annual payments. However, it can also be an incentive to halt a project depending on the level of the fees and the macroeconomic context affecting project viability. Operational stage fees do not incentivise speedy delivery but have a low present cost (i.e. good for cost effectiveness for consumers) and can be variable with other factors such as revenues and risk-sharing.

Therefore, MARA considers that all three of these options could be part of the framework, recognising, however that in the near-term it is most likely that fees at development stage will be important to achieve deliverability and incentivising timely delivery.

Do you agree? If not, why not?

2. Revenue type

MARA considered the following revenue models –

	Flat fee	Revenue share	Profit share
Description	Set payment which may be index linked	% share of all revenue or revenue above a reference level/price	% share of profit overall or revenue above a reference level
Examples in other jurisdictions	DE, FR, UK, NL	IE	No example identified

Preferred option: Flat fee and Revenue Share

MARA considers that profit share model is, while theoretically attractive, likely to be too complicated for effective delivery. MARA's levy framework charges a flat fee at development stage and revenue share during the operational stage. MARA is of the opinion that this provides a good balance of incentives and risk-sharing and proposes keeping this model.

Do you agree? If not, why not?

3. Price Bidding

MARA considered the following price bidding mechanisms –

	Unlimited price bid	Limited price bid	Price not bid
Description	Bidder may differentiate the price component of bid with no cap	Bidder can differentiate price component of their bid with a cap	Price is fixed by MARA (as per current levy framework)
Examples in other jurisdictions	DE: Pre & Non-pre development	NL: HKW & IJV UK: ScotWind and LR5	FR: AO6-8 IE: Phase 1 &2

Preferred option: Unlimited price bid or limited price bid

MARA's preference is to have at least one price component bid set in a manner which allows for differentiation between bidders (uncapped or capped at a level high enough so that most bids are expected to fall below the cap). The higher weighting of NPFs in the overall framework will limit the overall importance of the price component and contribute to project deliverability (see Section 2 on Competitive allocation model). We anticipate that any bidding would focus on the development stage payments.

Do you agree? If not, why not?

4. Bid mechanism

MARA considered the merits of the following bid mechanisms –

	Sealed bid	Ascending Clock
Description	Bidders submit best and final bids simultaneously	Bidding in rounds, with escalating bids
Examples in other jurisdictions	FR NL UK: ScotWind DE: pre-dev	UK : Leasing Round 5 DE: Non-pre dev US: BOEM auctions

Preferred option: Sealed bid

MARA notes that other countries that have used the ascending clock bidding mechanism, usually do so when they are not using NPFs. MARA strongly considers the that sealed bidding is more appropriate when using NPFs and avoids administrative complexity.

Do you agree? If not, why not?

Section 4 - Non-price factors (NPFs)

As part of its assessment of NPFs, MARA looked at the following criteria

1. Environmental criteria
2. Developer derisking
3. Socio-economic criteria
4. System integration criteria

1. Environment criteria

A. Assessment Evaluation of NPFs

In its consideration of how NPFs should be assessed, MARA considered the following –

OR

OR

	Assessment based on plans	Metrics and Standards	Pass or Fail	Scored out of 10
Description	Qualitative assessment of developers' plan for delivery of the project	Quantitative assessment based on pre-defined technical and financial and/or standards	Binary assessment	Assessment by score
Examples in other jurisdictions	UK: ScotWind NL: HKW	FR: AO6-8 DE: Pre & Non-pre development	NL, ScotWind at PQQ stage	NPF at auction allocation stage in all international examples

Preferred option: Metrics and standards; Pass/fail and scoring

MARA's preference is to use metrics and standards, rather than plan, for assessment purposes both at pre-qualification questionnaire (PQQ) and at allocation stage. This avoids subjectivity and excessive administrative burden on bidders and MARA.

For PQQ, we would favour pass/fail scoring of individual criteria, which could then lead to a pass criteria of 6 out of 10 or could require 100% pass rate across all PQQ criteria. This reflects the objective of a prequalification stage, which aims at ensuring that minimum standards are met across the bidder pool.

However, for allocation stage, we would consider scoring (granular or binary) where multiple criteria contribute to an overall score, and no individual criterion could fail the entire bid. Developers' bids would then be evaluated based on their total score with the highest-scoring bid being successful.

Do you agree? If not, why not?

B. Choice of NPFs

MARA chose to consider the following environmental criteria –

	Positive biodiversity impact	Minimisation of negative biodiversity impact	Supply chain sustainability
Description	Metrics to support biodiversity enhancement	Metrics to support the minimisation of negative biodiversity impacts associated with the development	Metrics such as scope 2 and 3 carbon accounting, circularity, recycled content
Examples in other jurisdictions	NL: HKW VI & IJV Alpha FR: AO6-8	NL: IJV Alpha&B DE: non pre-dev	DE: non pre-dev NL: HKW VI & IJV Alpha

Preferred option: Net positive biodiversity impact; Reduction of negative biodiversity impact

In relation to supply chain sustainability MARA is of the opinion that this is a complex topic which would be difficult to score.

Therefore, MARA supports the inclusion of both biodiversity criteria above on the basis that metrics can easily be developed, assessed and monitored. In addition, various options can be applied to both (e.g. financial contribution/deployment of relevant technology), which enables them to be easily adapted for site-specific calls.

Do you agree? If not, why not?

2. Developer derisking

MARA considered the follow criteria as part of NPFs for derisking a project –

	Preparatory work undertaken by bidder	Grid connection agreement in place	Stakeholder engagement prior to bid
Description	Assessment of preparatory work done e.g. plans, surveys etc.	Assessment of whether developers have grid connection in place	Assessment of consultations held prior to bid
Examples in other jurisdictions	No example	No example	No example

Preferred option: None

MARA proposes not including any developer derisking criteria in the framework in order to avoid multiple participants seeking to undertake the same surveys, obtain grid agreements for the same area or engage with the local population. The objective is to avoid incentivising a duplication of effort.

Do you agree? If not, why not?

3. Socio-economic criteria

In its deliberations on possible socio-economic criteria MARA considered the following:

	Local / European content	Wider supply chain standards	Job (direct / indirect)	Skills and training	Community shareholding
Description	High score for commitment of local/EU supply chain	High score for sustainability/ human rights standards	High score for commitment to create jobs	High score for commitment to training and upskilling	High score for commitment to community shareholding
Examples in other jurisdictions	FR: AO6-8	NL: IJV Apha & Beta	No examples	FR: AO6-8 DE: pre-dev	FR: AO6-8 Belgium: PEZ

Preferred option: Skills and training; Community shareholding

MARA considers that skills and training and community shareholding are the most appropriate criteria for the framework because they offer the best trade-offs between simplicity, measurability and impact.

Do you agree? If not, why not?

4. System integration criteria

In its assessment of system integration criteria, MARA considered the following –

	Coupling with storage	Coupling with hydrogen	Generation volume/profile	Power Purchase Agreement (PPA) secured
Description	High score for coupling project with storage capacity	High score for coupling project with H2 electrolysis capacity	High score for high yield / specific generation profile	High score if a PPA is secured for part or all of the capacity e.g. through a Memorandum of Understanding or similar
Examples in other jurisdictions	NL: IJV Beta Estonia	No examples	NL: HKW & IJV	DE: pre-dev

Preferred option: All options

MARA proposes to prioritise secured PPA offtake for initial calls for a competitive MAC without ORESS offtake. However, it also proposes keeping all options in the framework, including the potential to combine criteria in the future, in order to future-proof the framework for future evolutions and ways to manage energy integration.

Do you agree? If not, why not?

Section 5 - Assessing delivery incentives

MARA assessed criteria to incentivise delivery of energy under the following headings –

1. Financial delivery incentives
2. Non-financial delivery incentives

1. Financial delivery incentives

1. MARA assessed criteria to incentivise delivery of energy under the following headings –

	Bid bond	Performance bond (fixed)	Financial guarantee (bidded)
Description	Bidders pay set deposit, refundable when MAC awarded	Bidders pay set deposit, refundable when capacity delivered	Bidders bid on level of deposit refundable when capacity delivered
Examples in other jurisdictions	No examples	FR, DE, NL	NL: HKW

Preferred option: Performance bond

MARA's preference is for a performance bond with progressive refund at milestones in the development stage. Such pre-operational milestones would be set administratively. The performance bond and associated milestones would be set in a manner which provides delivery incentives, while balancing the impact on developer of such sum being set aside over the pre-operational years.

Do you agree? If not, why not?

2. Non-financial delivery incentives

MARA assessed criteria to incentivise non-financial delivery incentives

	Permit loss	Ban from future MAC allocation
Description	The MAC would be withdrawn from developers who miss delivery milestones	Developers who don't comply with delivery milestones are banned from future calls for a competitive MAC
Examples in other jurisdictions	UK: ScotWind	UK: CfD Allocation Round

Preferred option: Permit loss

MARA considers Permit loss as being appropriate to MARA's regulatory role and it works in line with the progressive performance bond (i.e. permit loss if total loss of bond). It also preserves deliverability while a project is live and does not reduce competition by excluding bidders from future rounds.

Do you agree? If not, why not?