



**Response by Energia to
Maritime Area Regulatory Authority
(MARA)**

Competitive MAC Consultation

30 September 2025

Executive Summary

Energia's primary concern is that the MAC process is being proposed to proceed without sufficient clarity on the grid connection process and the future route to market. In this context, the consultation risks advancing ahead of the critical enabling processes of grid access and market pathways. Without certainty on grid and offtake arrangements, developers cannot realistically commit to seabed rights or levy payments. Proceeding otherwise risks allocating MACs to projects that cannot progress, thereby undermining MARA's central objective of timely offshore delivery.

A MAC process that is correctly sequenced, with clarity on grid and route-to-market, can foster competition, attract bankable projects, and protect consumers. Conversely, a process that comes too early or demands significant upfront payments before these fundamentals are in place will deter participation, inflate costs, and erode confidence.

Energia strongly advocates for a holistic approach that brings together seabed rights, grid access, and market pathways and provides developers with a clear direction of travel. Running a MAC consultation in isolation provides only a partial picture and risks embedding rules that do not reflect project realities.

1 Introduction

Energia welcomes the opportunity to respond to MARA's consultation on the Competitive MAC framework. We share Ireland's ambition to accelerate the deployment of offshore renewable energy and recognise the importance of an effective seabed allocation system.

Energia believes that MARA has an opportunity to design a framework that is pragmatic and responsive to the specific needs of the offshore renewable development in Ireland. This means recognising that seabed rights cannot be considered in isolation from other enabling factors such as grid access and route-to-market arrangements.

Below, we set out our overarching comments on the framework, followed by our responses to specific consultation questions.

2 Overarching Comments

Grid and Route to Market Certainty Must Come First: Energia believes that a MAC process should not proceed in the absence of confirmed grid capacity and clear route to market arrangements. Without this certainty, developers cannot meaningfully commit to seabed rights or pay levies. Proceeding otherwise risks awarding MACs to projects that cannot advance to delivery, undermining MARA's primary objective of timely offshore renewable energy deployment.

A more holistic approach needs to be taken, and MAC Framework Cannot Be Designed in Isolation: Seabed rights, grid access, and route to market arrangements are parts of the same puzzle. Treating MAC in isolation creates an incomplete picture and does not reflect the practical realities of project development. Developers have shown they are not willing to commit significant upfront or ongoing seabed payments without clarity on grid or offtake. The period between MAC award and financial close is already one of high risk, requiring heavy developer investment before revenues are realised. If seabed payments are layered on top of this uncertainty, risks multiply. A holistic, integrated framework is essential to give confidence to investors and to ensure that projects awarded seabed rights can progress to delivery.

International experience shows that clarity on the process matters. In markets such as Great Britain, France, and the Netherlands, the pathway from seabed award through to delivery is understood, and developers know the process they are committing to and can follow the process. This creates confidence, draws in competition, and reduces costs. By contrast, Ireland's current approach risks requiring developers to spend tens of millions on seabed rights, survey and consenting costs without any assurance of connection or route to market.

Consultation is light on detail: Energia considers the consultation paper to be very light on detail. Proposals are not supported by sufficient explanation, worked examples, or assessment of pros and cons and therefore it is very difficult to ascertain how MARA has closed in on the preferred approach. There is also lack of clarity on how non-price factors would be incorporated, how scoring would work in practice, and how the auction mechanism would ensure both delivery and competitive outcomes. Greater transparency on these issues is needed to provide stakeholders with confidence.

3 Response to Consultation Questions

3.1 Overall Approach

3.1.1 Do you agree with the overall model of the draft competitive MAC framework including all the options considered?

Energia does not agree that the draft framework represents a comprehensive or balanced model. As outlined in section 2, Energia believes that the MAC is one part of the puzzle. Developers need a clear line of sight from seabed award through to project delivery, underpinned by certainty on grid connections and offtake opportunities. Without this, the framework risks limiting competition and awarding seabed rights to projects that may find it difficult to advance and end up tying valuable maritime areas. MARA's current proposals would place substantial obligations on developers, including potentially significant upfront financial commitments, without any clarity on whether their projects will be deliverable. A truly effective MAC framework must therefore be designed and consulted in a holistic way along with grid connection and route to market.

3.2 Allocation Model

3.2.1 MARA's preferred option for the pre-qualification criteria is Capability prequalification. Do you agree? If not, why not?

Energia would like to caution against implementing pre-qualification processes with onerous requirements. It is therefore important to clearly define what constitutes a "light-touch" pre-qualification. For example, the pre-qualification criteria in the Tonn Nua process have proven challenging for developers and, at times, appear unnecessarily burdensome or irrational. Clarifying the meaning and scope of a light-touch approach is essential to avoid such issues.

Energia also recommends that once a developer has successfully met the pre-qualification criteria, this status should be retained for future processes. A developer who has already qualified should not be required to repeat the same pre-qualification steps.

3.2.2 MARA's preferred option for the competitive allocation criteria is NPF/delivery incentives mainly. Do you agree? If not, why not?

MARA's preference for NPFs as the primary allocation criteria is concerning. Overemphasis on such factors risks replicating models like ScotWind, which imposed excessive costs on developers. Energia believes the focus should be on project deliverability and value for consumers, with any use of NPFs kept proportionate and simple.

3.3 Price Based Factors

3.3.1 MARA considered i) one of payment, ii) Annual levy at development stage iii) Annual levy at operational stage as payment options for the design of Price Based Factors. Do you agree? If not, why not?

Energia has concerns regarding the introduction of annual seabed levies, particularly their potential impact on consumer prices in an already high-cost electricity market. Energia also recommends that no payments should be required until grid access is confirmed, with additional payments introduced only once a clear route to market is secured.

3.3.2 MARA's preferred option for revenue model is a flat fee at development stage and revenue share during the operational stage. Do you agree? If not, why not?

No comments

3.3.3 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). Do you agree? If not, why not?

Energia supports the principle of allowing differentiation between bidders based on the price component. In this context, Energia's preference is for an uncapped bid price within the design. However, if a cap is to be introduced, it should be set at a sufficiently high level to avoid distorting the market mechanism.

3.3.4 MARA strongly considers the that sealed bidding is more appropriate when using NPFs and avoids administrative complexity. Do you agree? If not, why not?

Energia agrees that sealed bidding is the more appropriate mechanism. The ascending clock is completely unsuitable given there is no confirmed route to market or grid access.

3.4 Non-Price Based Factors

3.4.1 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. For PQQ, pass/fail

scoring and for allocation stage scoring mechanism. Do you agree? If not, why not?

Energia agrees in principle with the use of metrics and standards rather than a qualitative assessment of a developers' plan, however clarity is required on what specific quantitative assessment criteria MARA are considering. Without that clarity, it is impossible to judge whether the approach will be effective, fair or aligned with policy objectives.

In addition, MARA's assessment framework must be closely coordinated with DCEE's plans to develop non-price criteria (NPC) under the Net-Zero Industry Act (NZIA) as DCEE will be making the ultimate decisions regarding the inclusion of NPC in future auction designs.

3.4.2 MARA supports the inclusion of both Net positive biodiversity impact and Reduction of negative biodiversity impact criteria provided that metrics can easily be developed, assessed and monitored. Do you agree? If not, why not?

Energia would like to point out that Ireland is, as of yet, not a well-established market in terms of offshore development. Therefore, the main objective of MARA should be to make the process as attractive as possible to potential developers. Including a significant number of criteria at the early stage may deter investment. While such requirements may be appropriate in a mature market, Energia believes that Ireland has not yet reached that point. MARA's goal should be to facilitate competition by creating a simple and appealing process for developers.

In relation to specific biodiversity criteria, metrics around net positive in an offshore context do not exist and will be challenging to design and measure. In addition, a competitive MAC auction on an unconsented site means that very little if any information on the biodiversity sensitivities and opportunities of the site will be known. As a result, there would be a very limited ability to propose any meaningful measures to satisfy biodiversity criteria at the MAC application stage. Energia recommend that biodiversity criteria should not be applied pre-consent.

Energia also notes that supply chain sustainability is a particularly complex and difficult to score. We strongly advise against including it as an environmental criterion.

3.4.3 MARA proposes not including any developer derisking criteria in the framework. Do you agree? If not, why not?

Energia agrees with the proposal of not including any developer derisking criteria in the framework.

3.4.4 MARA considers that skills and training and community shareholding as the most appropriate socio-economic criteria. Do you agree? If not, why not?

Energia would strongly caution against overburdening developers with aspirational commitments that are difficult to deliver or measure. Because of such requirements, in the past there has been a tendency to overcommit and not follow through, therefore careful consideration needs to go into setting this criterion. The only socio-economic metric that has real potential to be effective is local or European content, provided it is defined clearly and measured consistently.

3.4.5 Do you agree with MARA's system integration criteria?

Energia does not believe that coupling with storage or hydrogen is practical at this stage. Nor is it realistic to expect developers to secure long-term PPAs a decade in advance. It is not practical to expect a party to sign a PPA without clarity on grid connection and route to market. As such, Energia believes that all options presented in system integration are not practical would only add complexity and risk.

3.5 Assessing delivery incentives

3.5.1 MARA's preference is for a performance bond with progressive refund at milestones in the development stage as financial delivery incentive. Do you agree? If not, why not?

Energia is okay with the use of performance bonds with progressive refunds at milestones, however, the delivery milestones must only be triggered once grid access and route-to-market certainty are in place, otherwise developers are being penalised for factors outside their control.

3.5.2 MARA considers Permit Loss as appropriate non-financial delivery incentive. Do you agree? If not, why not?

Energia agrees that the Permit Loss is an appropriate non-financial incentive. It provides a clear consequence for non-delivery while avoiding the disproportionate and completely inappropriate impact of banning developers from future rounds.