

European Commission

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
B-1049 Brussels
Belgium

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KITEMILL'S CONTRIBUTION TO NZIA PUBLIC CONSULTATION

Implementing Regulation on Non-Price Criteria in Renewable Energy Auctions

(Due Date: 21 February 2025)

Overview

Kitemill, as a leading AWE OEM, welcomes the integration of innovation into renewable energy auctions under the NZIA. We believe that embedding technology-specific non-price criteria will not only foster the deployment of next-generation technologies but also ensure fair competition by acknowledging the unique characteristics of airborne wind energy.

Key aspects of our feedback include:

Terminology Update:

We propose that references to “kite-borne wind turbine projects” be updated to “airborne wind energy (AWE) projects.” This change better reflects the technology’s full scope and maturity, aligning industry practice with academic and market terminology.

Auction Design:

We support the creation of pure innovation auctions alongside general deployment auctions. Pure innovation auctions should be structured with non-price criteria that specifically evaluate the distinct benefits of AWE, including its higher capacity factors, reduced material intensity, and modular deployment advantages.

Tailored Non-Price Criteria:

Uniform criteria across all net-zero technologies risk overlooking the unique supply chain dynamics and performance characteristics of AWE. We recommend that the Implementing Regulation incorporate technology-specific benchmarks. For example, pre-qualification criteria should consider measures like Technology Readiness Levels (TRLs), Commercial Readiness Levels (CRLs), and Technology Performance Levels (TPLs) to accurately assess project maturity.

Balancing Innovation and IP Protection:

While the requirement for projects to demonstrate advancements beyond the state of the art is critical, the criteria should remain flexible to support emerging technologies that are still in early commercialisation stages. Additionally, intellectual property (IP) protections must balance incentivising innovation with ensuring that knowledge dissemination is not unnecessarily restricted. Licensing obligations should be voluntary or limited to publicly funded projects.

Detailed Feedback

The following table summarises our specific comments:

Original Provision	Kitemill's Comments as AWE OEM
Recital 28 (Innovation Auctions): Mentions "kite-borne wind turbine projects" in pure innovation auctions.	Update terminology to "airborne wind energy (AWE) projects" to accurately reflect the technology's current market and academic standing.
Auction Criteria: Uniform non-price criteria across all net-zero technologies.	Recommend technology-specific non-price criteria that account for the unique operational, supply chain, and performance characteristics of AWE systems.
Project Maturity Assessment: Focus on state-of-the-art improvements.	Incorporate standardized metrics such as TRL, CRL, and TPL to ensure that emerging AWE technologies are assessed fairly, with a suggested TRL threshold of 7–9 for pre-qualification.
IP Protection Measures: Requirements for licensing practices.	Balance IP protection with knowledge dissemination; ensure that licensing obligations are voluntary or primarily apply to publicly

Original Provision**Kitemill's Comments as AWE OEM**

funded projects to foster continued private-sector innovation.

Conclusion

Kitemill's feedback aims to ensure that the Implementing Regulation on Non-Price Criteria in Renewable Energy Auctions effectively supports innovative technologies like airborne wind energy. By incorporating technology-specific benchmarks and updating the relevant terminology, the NZIA can more accurately reflect the potential of AWE to contribute to the EU's net-zero targets.

For further details or to provide additional feedback, please contact the Kitemill team.

Kind Regards



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