PART III.8

Supplementary Information Sheet for the notification of an evaluation plan

EFTA States must use this sheet for the notification of an evaluation plan pursuant to Article 1(2)(a) of Regulation (EU) No 651/2014[1] and in the case of a notified aid scheme subject to an evaluation as provided in the relevant Authority guidelines.

Please refer to the European Commission Staff Working Document "Common methodology for State aid evaluation"[2] for guidance on the drafting of an evaluation plan.

1. Identification of the aid scheme to be evaluated

(1) Title of the aid scheme:

Aid scheme for the development of a new floating offshore wind farm in Utsira Nord, Case No. 93862.

(2) Does the evaluation plan concern:

(a) ☐ a scheme subject to evaluation pursuant to Article 1(2)(a) of Regulation (EU) No 651/2014?

(b) ☒ a scheme notified to the Authority pursuant to Article 1(3) of Part 1 of Protocol 3 to the Surveillance and Court Agreement?

(3) Reference of the scheme (to be completed by the Authority):

[To be completed by ESA]

(4) Please list any existing *ex-ante* evaluations or impact assessments for the aid scheme and *ex-post* evaluations or studies conducted in the past on predecessors of the aid scheme or on similar schemes. For each of those studies, please provide the following information: (a) a brief description of the study's objectives, methodologies used, results and conclusions, and (b) specific challenges that the evaluations and studies might have faced from a methodological point of view, for example data availability that are relevant for the assessment of the current evaluation plan. If appropriate, please identify relevant areas or topics not covered by previous evaluation plans that should be the subject of the current evaluation. Please provide the summaries of such evaluations and studies in annex and, when available, the internet links to the documents concerned:

This is the first time state aid for development of a full scale floating offshore wind project is awarded in Norway. Consequently, the Norwegian authorities have not conducted any evaluations or studies in the past on predecessors of the aid scheme or on similar schemes.

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1 Commission Regulation (EU) No 651/2014 of 17 June 2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty (OJ L 187, 26.6.2014, p. 1), referred to in point 1j of Annex XV to the EEA Agreement, see Joint Committee Decision No 152/2014, published in OJ L 342, 27.11.2014, p. 63 and EEA Supplement No 71, 27.11.2014, p. 61.

2 SWD (2014)179 final of 28.5.2014.

2. Objectives of the aid scheme to be evaluated[3]

2.1. Please provide a description of the aid scheme specifying the needs and problems the scheme intends to address and the intended categories of beneficiaries, for example size, sectors, location, indicative number:

The overall objective of the Utsira Nord aid scheme is to contribute to the development of cost-effective floating offshore wind projects in a sustainable way, so that Norway's and the EU's long-term climate targets can be achieved. The scheme will increase the amount of renewable energy production, to meet the expected demand for electricity in the years to come.

In addition to the aim of producing emission-free energy, the aid scheme for Utsira Nord aims to facilitate innovation and technological and industrial development within floating offshore wind. This is necessary to reach the Norwegian government's ambition to award areas suitable for an installed capacity of 30 GW offshore wind production by 2040. Further, the scheme will contribute to increasing the capacity in the supply chain to meet the Norwegian and the European Union's ambitions for offshore wind. The objectives of the aid scheme are summarized below:

Primary objectives:

1. Support the development of cost-effective floating offshore wind

Secondary objectives:

1. Facilitate innovation, technological and industrial development in floating offshore wind
2. Contribute to increasing the capacity in the supply chain to cater for future demand

The objectives of the scheme are well aligned with the regulatory framework in the EU and the objectives of the CEEAG.

Similarly to the EU, the Norwegian authorities consider increased offshore wind generation to constitute an important means for reducing greenhouse gas emissions and mitigating climate change. The existing electricity surplus in Norway is expected to diminish towards 2030 due to a significant expected increase in electricity consumption in the coming years, without a corresponding increase in new generation capacities.[4] Due to constraints limiting the expansion of other renewables, there is a wide consensus within the energy sector that offshore wind represents a viable option for establishing new large-scale, renewable electricity production in Norway within the desired timeframe.[5]

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[3] Beyond providing a general description of the objectives and eligibility rules of the scheme, the aim of this section is to assess how the eligibility and exclusion rules of the scheme may be used to identify the effect of aid. In some cases, the precise eligibility rules may not be known in advance. In those cases, the best available expectations should be provided.

[4] The consumption growth is mainly expected to come from electrification of existing industry, transport and several oil and gas installations offshore, and new industry. See e.g. NVE (2025) Langsiktig kraftmarkedsanalyse 2025, p. 47 and Statnett (2023) Langsiktig markedsanalyse 2024-2050, p. 41.

[5] See e.g. NVE (2025), THEMA (2023) Nordic Power Market Outlook, p. 34 (Appendix 1), Statnett (2025) Langsiktig markedsanalyse 2024-2050, p. 42-43 and DNV (2025) Energy Transition Outlook Norway, p. 3 and 35.

Norway has considerable sea areas. This, combined with good wind conditions along the Norwegian coast, provides a good starting point to produce clean energy from offshore wind. However, the Norwegian continental shelf is deep, and large parts of it consists of deep sea with depths down to 3,000-4,000 meters.

Consequently, large parts of the Norwegian sea areas are suitable for floating offshore wind, but too deep for bottom-fixed technology. Floating offshore wind will therefore be key to realizing the Norwegian offshore wind potential.[6]

Considering the current high-costs level of developing floating offshore wind, there is a need for state aid to incentivize commercial deployment of projects. All indications show that in the absence of aid, floating offshore wind projects will not be constructed and operated at Utsira Nord.[7]

The proposed aid scheme is limited to offshore wind projects in the area Utsira Nord. The area has an average depth of 265 meters and is therefore only suitable for floating technology. The decisions to open areas for electricity generation in Norway are based on a thorough process involving preliminary studies, public consultation, and advice from The Norwegian Water Resources and Energy Directorate (NVE). As a result of this extensive opening process, it is necessary to limit the opening process to specific geographical areas. The physical characteristics of Utsira Nord makes floating offshore wind the only relevant technology, as alternative technologies for offshore energy production, such as wave power, are not sufficiently mature to ensure production capacity on the same scale. Due to the abovementioned factors, the aid scheme is exclusively directed towards one category of beneficiaries: floating offshore wind developers.

Aid will be awarded through a competitive bidding procedure in the form of a monetary auction. To minimize the need for state aid and cater for project completion, the Norwegian authorities have devised a two-step model. The first step is a competition for the award of project areas which is based on objective and transparent criteria in accordance with section 2-3 of the Offshore Energy Act. The competition was open to all interested actors.

On 15 September 2025, the Ministry received two applications for the awarding of project areas. The Ministry has evaluated the two applications. The qualitative criteria of the competition were i) Cost levels, realism and maturity, ii) Execution capability, iii) Sustainability, iv) Innovation and technological development, and v) Positive ripple effects.[8]

Both applicants met the qualification requirements and provided good responses to the qualitative criteria. As a result, both applicants were awarded their preferred project area on 13 February 2026.

Following this allocation of project areas, the successful developers will enter a maturation phase of approximately two years to further develop their projects and carry out project-specific impact assessments. In the second step, the Ministry will hold a state aid competition in the form of a monetary auction, where all eligible

[6] Further explained in the Notification section 2.3.
[7] Reference is made to the Notification section 3.3.
[8] Further explained in the Notification section 3.4.3.

matured projects will compete for state aid. The auction will be organised so that only one project receives state aid.[9]

2.2. Please indicate the objectives of the scheme and the expected impact, both at the level of the intended beneficiaries and as far as the objective of common interest is concerned:

As mentioned above, the overall objective of the Utsira Nord scheme is to contribute to the development of cost-effective floating offshore wind projects in a sustainable way, so that Norway's and the EU's long-term climate targets can be achieved. The scheme will increase the amount of renewable energy production, to meet the expected increase in demand for electricity in the years to come. In addition to the aim of producing emission-free energy, the aid scheme for Utsira Nord aims to facilitate innovation and technological and industrial development within floating offshore wind. This is necessary to reach the Norwegian government's ambitions for offshore wind. Further, the scheme will contribute to increasing the capacity in the supply chain to meet the Norwegian and the European Union's ambitions for offshore wind. The objectives of the scheme are well aligned with the regulatory framework in the EU and the objectives of the CEEAG.

The expected impact of the aid scheme is the realization of a full scale floating offshore wind project at Utsira Nord, for which there would be no commercial basis for in the absence of State aid. For the beneficiary of the aid, they will be incentivized to carry out large investments in renewable energy which can contribute to electrification of sectors currently using fossil fuels, which contributes to further decarbonisation of the Norwegian economy. The competitive element of the scheme aims to ensure that state aid is limited to what is necessary to incentivize the investments, while maintaining the cost-effectiveness of the projects, minimizing the risk of overcompensation, and avoiding distortion of competition in a manner contrary to the common interest.

2.3. Please indicate possible negative effects, on the aid beneficiaries or on the wider economy, which might be directly or indirectly associated with the aid scheme[10]:

The characteristics of intermittent renewable energy sources generation may entail potential negative effects on the wider economy.

In general, intermittent renewable energy sources could entail risks related to increased non-dispatchable power generation in the energy system. This includes, but is not limited to, the fact that their generation cannot be fully planned or controlled. This could pose challenges for the stable operation of the power system, either by requiring sufficient backup capacity or by ensuring the safe operation of the grid. Other potential negative effects include the fact that the close to zero marginal costs of power generation could lead to periods of negative electricity prices.

[9] Further explained in the Notification section 3.4.4

[10] Examples of negative effects are regional and sectorial biases or crowding out of private investments induced by the aid scheme.

The Ministry considers the potential negative effects to be minimal, as the present scheme will only grant aid to one project of approximately 500 MW. In the greater context, the level of financial support and corresponding expected capacity which will receive state is therefore limited.

For the aid beneficiary, there is an inherent risk that the support level is not sufficient for the project to be realized. Both investment costs and future electricity prices are highly uncertain, due to the lack of reference projects for floating offshore wind and since all electricity price projections are based on assumptions made for the future. The beneficiary will carry the risk of investment and operational costs, as well as any risks related to the operation and production of the project.

However, the two-step competition model is designed to address this issue. The maturation phase will enable developers to optimize the project, reduce risk and obtain more certainty regarding cost levels. In addition, the competition for awarding project areas is, among others, based on qualitative criteria for cost levels, realism and maturity. The criterion contributes to cost reductions and cost-effective projects. In sum, this will reduce the risk of overly optimistic bids in the monetary auction and non-delivery of the project.

2.4. Please indicate (a) the annual budget planned under the scheme, (b) the intended duration of the scheme[11], (c) the aid instrument or instruments and (d) the eligible costs:

(a) The annual budget planned under the scheme
In the proposal for state budget for 2025 the Government presented the overall framework for the scheme to the Parliament. The proposal was based on various sources of information including cost estimates presented in the public consultation, feedback from the public consultation and recent market developments.

There is no annual budget planned under the scheme. The Parliament approved the proposed support scheme and budget constraint 19 December 2024. The budget constraint was set to 35 billion 2025-NOKs, which will serve as a binding constraint in the state aid auction. The budget constraint represents the Government's willingness to pay for floating offshore wind. The substantial part of the aid amount will be disbursed following project completion.

(b) The intended duration of the scheme
Investment aid will be granted as part of the monetary auction, which is expected to take place in 2028-2029. Aid will be dispersed as cash payment to the beneficiary. Further, as noted above, the Ministry will pay a substantial part of the total investment aid only after the project is completed. The floating offshore wind project is expected to be completed within 10 years from the ESA's approval decision.

[11] Aid schemes defined in Article 1(2)(a) of Regulation (EU) No 651/2014 are excluded from the scope of the Regulation six months after their entry into force. After having assessed the evaluation plan, the Authority may decide to extend the application of the Regulation to such schemes for a longer period. EFTA States are invited to precisely indicate the intended duration of the scheme.

(c) The aid instrument or instruments
The aid under the scheme will be granted in the form of investment aid. To avoid overcompensation, the Norwegian authorities will also introduce a mechanism (clawback) to reduce the risk of unexpected windfall profits.[12]

(d) The eligible costs
The aim of the aid is to secure economic viability for a floating offshore wind project at Utsira Nord, which is not commercially viable without aid. Thus, the eligible costs are the total costs of developing and constructing a floating offshore wind farm at Utsira Nord.

2.5. Please provide a summary of the eligibility criteria and the methods for selecting the aid beneficiaries. In particular, please describe the following: (a) the methods used for selecting beneficiaries (e.g. such as scoring), (b) the indicative budget available for each group of beneficiaries, (c) the likelihood of the budget being exhausted for certain groups of beneficiaries, (d) the scoring rules, if they are used in the scheme, (e) the aid intensity thresholds and (f) the criteria the authority granting the aid will take into account when assessing applications:

As explained in section 2.1, the scheme will consist of a competitive procedure in two steps. Aid will only be awarded in step 2 of the competition.

The first step of awarding area was based on objective and transparent criteria in accordance with section 2-3 of the Offshore Energy Act. In the qualitative competition for awarding areas, applicants were assessed based on the criteria i) Cost levels, realism and maturity, ii) Execution capability, iii) Sustainability, iv) Innovation and technological development, and v) Positive ripple effects.

Following the allocation of project areas on 13 February 2026 , the successful developers will enter a maturation phase of approximately two years to further develop their projects and carry out project-specific impact assessments, which is considered important to minimize the amount of state aid.

In the second step, the Ministry will hold a state aid competition in the form of a monetary auction, given that the developers have met the conditions for participating.[13] The two developers will compete for state aid for their matured projects. State aid will be granted to the developer who are willing to realize their project with the lowest amount of state aid. The aid auction will be organized in a way that entails that only one project will receive aid. As previously mentioned, the overall budget is set to 35 billion 2025-NOK. The aid amount will be determined by the outcome of the competitive bidding procedure through the state aid auction, where prospective beneficiaries will bid on the level of aid/MW (aid amount) needed to construct the floating offshore wind farm. The budget constraint of 35 billion 2025-NOK is a binding constraint in the auction.

As only one of the two eligible projects will be granted aid in the first aid competition at Utsira Nord, the scheme only operates with one group of beneficiaries. Consequently, the proposed scheme does not operate with different

[12] Further explained in the Notification section 3.5.2.
[13] Further explained in the Notification section 3.4.4

groups of beneficiaries or budgets.

2.6. Please mention specific constraints or risks that might affect the implementation of the scheme, its expected impacts and the achievement of its objectives:

There is an inherent risk that the support level is not sufficient for the project to be realized. Both investment costs and future electricity prices are highly uncertain, due to the lack of reference projects for floating offshore wind and since the projections presented of the prices are based on assumptions made for the future. The beneficiaries will carry the risk of investment and construction costs, as well as risks related to the operation and production from the projects.

3. Evaluation questions

3.1. Please indicate the specific questions that the evaluation should address by providing quantitative evidence of the impact of aid. Please distinguish between (a) questions related to the direct impact of the aid on the beneficiaries, (b) questions related to the indirect impacts and (c) questions related to the proportionality and appropriateness of the aid. Please explain how the evaluation questions relate to the objectives of the scheme:

The Ministry commits to conducting an ex-post evaluation in accordance with CEEAG chapter 5 and taking into account the best practices recalled in the Commission Staff Working Document on a Common methodology for State aid evaluation ("EC Common Methodology"). In line with the requirement of CEEAG point 458, the ex-post evaluation will verify whether the assumptions and conditions underlying the compatibility of the scheme have been achieved, in particular, the necessity and effectiveness of the scheme.

(a) Questions related to the direct impact of the aid on the beneficiaries

- Has the aid incentivized the beneficiary's plans for installations at Utsira Nord? (incentive effect)
- How successful has the aid scheme been in supporting the establishment of a cost-effective floating offshore wind project? (primary objective)
- How many new installations are to be developed under the scheme and what is the investment cost per installation? (primary objective)
- What is the installed capacity of the project and what is the aid per MW? (primary objective)
- To what extent has the project supported and utilized technological development in floating offshore wind? (Secondary objective 1)
- To what extent has the aid affected the financial performance of the beneficiary? (possible negative effects on the aid beneficiary)

(b) Questions related to the indirect impacts

- To what extent has the project supported innovation in floating offshore wind and the supply chain? (secondary objective 1)
- How many jobs are to be created, both by the direct beneficiary of aid and in the supply industry? (secondary objective 2)

- To what extent has the aid had a positive impact on the capacity in the supply chain for offshore wind? (secondary objective 2)

(c) Questions related to the proportionality and appropriateness of the aid

- Did the aid scheme prevent overcompensation of the beneficiary?
- Could the offshore wind project have been established with less aid or through a less distortive aid instrument?
- Did the tender design result in fair and effective competition among the potential bidders?
- Is the design of the scheme suitable compared to support schemes for immature technologies in other EU and/or EEA countries?
- Did the clawback mechanism reduce the risk of overcompensation ex post?

4. Result indicators

4.1. Please use the following table to describe which indicators will be built to measure outcomes of the scheme, as well as the relevant control variables, including the sources of data, and how each result indicator corresponds to the evaluation questions. In particular, please mention (a) the relevant evaluation question, (b) the indicator, (c) the source of data, (d) the frequency of collection of data (for example, annual, monthly, etc.), (e) the level at which the data is collected (for example, firm level, establishment level, regional level, etc.), (f) the population covered in the data source (for example, aid beneficiaries, non-beneficiaries, all firms, etc.):

Evaluation question	Indicator	Source	Frequency	Level	Population
Direct effects					
Has the aid incentivised the beneficiary's plans for installations at Utsira Nord? (incentive effect)	Difference in investment/planning outcomes between beneficiary and control group	Evaluation body	In 2035	Firm level	Beneficiary and control group
How many new installations are to be developed under the scheme, and what is the investment cost per MW?	Number of new offshore installations and type of installations	Auction results/licence application[14]	After the auction	Firm level	Beneficiary
What is the planned installed capacity of the project and what is the aid per MW?	MW of planned installed capacity and aid granted	Regular status and progress reports[15]/, Licence application	After the auction	Firm level	Beneficiary

[14] Licence application refers to the application for a licence to establish renewable energy production under section 3-1 of the Offshore Energy Act.
[15] Described in section 6.1.

		Auction results			
To what extent has the project supported and utilized technological and industrial development in floating offshore wind?	a) Use/testing of new floating offshore wind technologies[16] and b) Reduction in expected cost per MW compared to a baseline year[17]	Progress reports and project documentation[18]	Annually and after project completion	Project level	Beneficiary
To what extent has the aid affected the financial performance of the beneficiary? (possible negative effects on the aid beneficiary)	Changes in key financial indicators	Financial and economic documentation and audited financial reports[19]	After contract signing and then annually	Firm level	Beneficiary
Indirect effects					
To what extent has the project supported innovation development in floating offshore wind and in the supply chain?	Number and type of collaboration with research institutions or suppliers for technology development Registration of new patents associated with Utsira Nord	Project documentation and milestone plan European Patent Office database	Annually	Project level	Beneficiary and research partners / suppliers
How many jobs are to be created, both by the beneficiary of the aid and in the supply industry?	Number of jobs (FTE)	Financial and economic documentation and Statistics Norway	Bi-annually	National and EU level	Beneficiary and control group Supply industry
To what extent has the aid had a positive impact on the capacity in the supply chain for offshore wind? (secondary objective 2)	Extent to which the beneficiary's subcontractors for the project have been utilized by other floating	Evaluation body Financial and economic documentation and audited	In 2030 and 2035	Project level	Beneficiary's sub-contracted suppliers European

[16] "New floating offshore wind technologies" refers to technological innovations that have not previously been deployed commercially in a large scale project. This includes, but is not limited to, new floating foundation designs, turbines integrations or grid solutions adapted for deep water.
[17] Described in section 5.1 – Indirect effects
[18] Described in section 6.1
[19] Described in section 6.1

	offshore wind projects	financial reports.			offshore wind developers
Proportionality and effect					
Did the aid scheme prevent overcompensation of the beneficiary?	Actual financial returns vs. expected returns Activation and magnitude of clawback payments	Audited Annual Financial Report	After project completion	Firm level	Beneficiary
Could the offshore wind project have been established with less aid or through a less distortive aid instrument?	Effective aid intensity (€/MW)[20], benchmarked against comparable projects Realized profitability relative to baseline expectations and compared to floating offshore wind or immature technology projects supported under alternative aid instruments Activation and magnitude of clawback payments	Aid awarded Other projects and support schemes (State aid decisions, notifications, industry reports) Financial and economic documentation and audited reports	After project completion	Project level	Beneficiary
Did the aid scheme allow for appropriate competition in the tender and auction process?	The number of applicants[21] and requested state aid per offered capacity per bid	Ministry of Energy	After conclusion of auction	Firm level	Applicants
Is the design of the scheme optimal compared to support	a) Aid intensity (€/MW) for other comparable EU	Aid awarded	In 2030 and final evaluation	National and	Beneficiary and comparable

[20] MW is defined as installed capacity, which is consistent with the investment support agreement.
[21] Given that only two firms has been applying for and awarded a project area the maximum of application is two and not three as original planned.

schemes for comparable immature technologies in other EU and/or EEA countries?	immature technology schemes b) Cost per MWh for comparable offshore projects	Other projects and support schemes		EU level	projects and schemes
Did the clawback mechanism reduce the risk of overcompensation ex post?	Clawback payments (€) relative to realised project revenues	Financial and economic documentation and audited financial reports Electricity market price data	Annually	Project level	Beneficiary

Please explain why the chosen indicators are the most relevant for measuring the expected impact of the scheme:

The selected indicators are specifically chosen based on their suitability and reliability in terms of providing data that can shed light on the evaluation questions and their ability to provide quantitative information. The chosen indicators provide a solid basis for an evaluation of the effectiveness of the scheme.

Direct effects

Incentive effects and project realisation: To assess whether the aid had an incentive effect, the evaluation uses indicators capturing differences in investment and planning outcomes between the beneficiary and a control group. This indicator is directly linked to the evaluation question on whether the aid incentivised the beneficiary's investment decisions and relates to the primary objective of enabling the development of floating offshore wind.

Number of installations: The primary objective of the scheme is to support the development of a cost-effective floating offshore wind project. The number and type of new installations developed under the scheme is not an objective in itself, but a relevant intermediate outcome that is closely linked to cost-effectiveness. In particular, a higher number of installations contributes to cost-effectiveness through economies of scale, learning-by-doing, and standardization in project development, installation, and operation. In the context of an immature technology such as floating offshore wind, the scale of deployment is a key driver of cost reductions over time and therefore directly informs the evaluation question on the effectiveness of the scheme in supporting cost-effective deployment

Installed capacity and aid per MW: These indicators are used to measure the scale and cost-effectiveness of the supported project and are directly linked to the primary objective of supporting the cost-effective development of floating offshore wind. Installed capacity reflects the amount of renewable electricity generation enabled by

the aid, while aid per MW provides a standardised measure for assessing whether the level of support is proportionate relative to the capacity deployed. To ensure that these indicators meaningfully inform cost-effectiveness, they will be interpreted in relation to relevant benchmarks, including comparable floating offshore wind projects and support schemes in the EEA, rather than in isolation

Technology development: Floating offshore wind technologies have, to date, been deployed mainly in pilot projects and only to a limited extent in commercial applications. The selected indicators are therefore directly linked to the scheme's secondary objective of facilitating technological development. They are particularly relevant given the immature nature of the technology, where technological learning, demonstration effects, and cost reductions are central expected outcomes of early-stage deployment supported by State aid, and are used to answer the evaluation question on whether the scheme has contributed to technological development.

Indirect effects

Employment and supply chain: Indicators on job creation and the utilisation of subcontractors by other floating offshore wind projects are directly linked to the secondary objective of increasing capacity in the offshore wind supply chain. Employment indicators capture both direct and indirect labour market effects, while the reuse of suppliers across projects provides evidence of whether the scheme contributes to the development of a more mature and scalable supply chain beyond the supported project and addresses the evaluation question regarding wider economic and supply chain effects.

Innovation: Indicators of the number and type of collaborations with research institutions and suppliers and registration of new patents associated with Utsira Nord are directly linked to the secondary objective of facilitating innovation. In the context of an immature technology, innovation often occurs through joint development processes, knowledge exchange, and experimentation between project developers, research environments, and specialised suppliers. By capturing the number and type of collaborations, it is possible to assess whether the project has contributed to increased innovation and knowledge diffusion beyond the core investment.

Proportionality and effect

Overcompensation and proportionality: Indicators comparing actual financial returns with expected returns, together with clawback payments relative to realised revenues, are directly linked to the proportionality requirement under the CEEAG. These indicators allow the evaluation to assess whether the beneficiary's actual returns exceed the projections underlying the financial assumptions used in the notification of the scheme.[22] This also shows whether any excess returns are effectively captured through the clawback mechanism, particularly when energy market conditions are more favourable than expected. This allows the evaluation to assess whether the aid remains limited to the minimum necessary and whether

[22] Article 63 in Notification to ESA – Aid scheme to facilitate the development of floating offshore wind at Utsira Nord

overcompensation is prevented ex post.

Aid intensity and necessity of aid: The effective aid intensity (€/MW) is used to assess whether the floating offshore wind project could have been established with less aid and to compare the scheme with support measures for comparable immature technologies in other EU and EEA countries. These indicators relate to the necessity of the aid. Aid intensity provides a standardized measure that enables comparison across projects and schemes, including comparisons with similar support schemes for floating offshore wind and other immature renewable technologies in the EEA. Such comparisons allow the evaluation to assess whether the level of aid under the scheme is broadly in line with aid provided for comparable projects, or whether the same policy objective could potentially have been achieved with a lower level of aid.

Appropriateness: Comparison of effective aid intensity across different aid instruments (e.g. CfD and investment support without a clawback mechanism) will be used to examine the appropriateness of the aid scheme, and to determine whether comparable projects supported through alternative aid instruments achieve similar outcomes. If comparable projects supported through alternative aid instruments achieve similar outcomes with lower aid intensity, and this cannot be explained by differences in risk allocation or project characteristics, this may indicate that less distortive instruments could have been used to achieve the same policy goals. Additionally, the number of applicants and requested state aid per offered capacity per bid will be used as indicators of the level of competition and the attractiveness of the aid instrument, which may provide additional evidence on its appropriateness.

5. Envisaged methods to conduct the evaluation

5.1. In light of the evaluation questions, please describe the envisaged methods to be used in the evaluation to identify the causal impact of the aid on the beneficiaries and to assess other indirect impacts. In particular, please explain the reasons for choosing those methods and for rejecting other methods (for example, reasons related to the design of the scheme)[23]:

Final report (in the end of 2035)[24]:

The final report will contain an analysis of the efficiency and effectiveness of the tendering process and an early assessment of the suitability of the methodologies proposed for the overall evaluation.

Interim reports (additional report 1 by 2030).

Direct effects

To identify the causal effect of the State aid, both in terms of the incentive effect and the direct effects, the behaviour of the beneficiary will be compared with that of a control group composed of tenders that do not receive State aid. This comparison enables the construction of a counterfactual scenario that represents what would

[23] Please make reference to SWD(2014)179 final of 28.5.2014.
[24] Article 135 in College Decision 067/25/COL – State aid – Norway – Norwegian scheme for floating offshore wind – Utsira Nord

have happened in the absence of aid.

This method assumes that differences between the beneficiary and the control group are stable over time, that both are equally affected by external and common shocks, and that the only systematic difference between them is the receipt of State Aid (SWD(2014)179 final of 28.5.2014). The causal impact is defined as the difference between the outcome with State aid and the outcome without State aid. Within the context of the scheme, two outcomes are defined to capture the direct effect:

1. Outcome 1: The potential agent decides to develop a floating offshore wind project before 2035.
2. Outcome 2: The potential agent decides not to develop a floating offshore wind project before 2035.

The ex-ante causal expectation is that, in the absence of State aid, the beneficiary would not have developed a floating offshore wind project. This expectation will find empirical support if companies in the control group decide not to develop floating offshore wind projects in their respective areas, while the beneficiary does. The assumptions behind this method is discussed further in section **Feil! Fant ikke referansekilden.**.

Indirect effects

To investigate the indirect effects of the State aid, it is not possible to use the suggested control group. Since the aid is assumed to be necessary for the decision to develop a floating offshore wind project, the control group cannot be applied for this purpose.

Instead, a before-after design will be used. In this design, the outcome for the beneficiary in the current year will be compared to the outcome in a baseline year (either the year before the contract was signed or the year of contract signing). This approach allows the evaluation to trace developments over time in indicators related to innovation, technological progress and supply chain effects.

While this method does not enable a precise estimation of the causal impact of the aid, it provides a structured way to observe changes that are plausibly associated with the realization of the Utsira Nord project. As set out in section 2.2, there would be no commercial basis to develop floating offshore wind at Utsira Nord without State aid. The aid therefore constitutes the key enabling factor for large-scale investment, which in turn is expected to generate broader effects on the economy, innovation and the supply chain for floating offshore wind. Examining changes in project-level indicators will make it possible to identify these indirect effects associated with the project.

Proportionality and appropriateness of the aid

To assess whether the aid is proportionate and appropriate relative to its objectives, a comparative assessment will be employed.

The analysis will focus on whether the aid amount was proportionate to the actual

costs incurred by the beneficiary and whether the design of the scheme ensured effective competition. This would be done by an assessment of the effective aid intensity compared to other commercial floating offshore wind projects. If other projects have a lower effective aid intensity it indicates that the same outcome could be achieved with less public support. The control group will be chosen to ensure the highest degree of similarity regarding depth conditions, seabed conditions, distance to shore, wind and wave conditions need for mitigation measures, or regulatory framework conditions, as these dimensions are strongly correlated with project costs.

The analysis will also assess whether the scheme is optimal relative to comparable aid schemes for immature, capital-intensive low-carbon technologies, with limited commercial track records. In this context, relevant comparator schemes include other floating offshore wind projects, and where appropriate, support schemes for technologies such as CCS and low-carbon fuels (including blue and green hydrogen). These technologies share key economic and policy relevant features with floating offshore wind, including high upfront investment costs, long development timeline and market risk. All of these technologies, to a large extent, relies on public support to enable early development and cost reductions. The exact technologies are to be decided by the evaluation body.

The proportionality of the aid will be examined by reviewing the beneficiary's financial data, including annual audited accounts and aid intensity measures. The analysis will also assess whether competitive pressure in the tender contributed to limiting the aid to what was necessary and preventing overcompensation.

The appropriateness of the scheme will be analysed by assessing whether the design of the scheme, including eligibility criteria, qualification requirements, and the sealed-bid auction format, enabled effective competition among bidders. The analysis will also include a benchmarking of aid intensity and production costs against similar support schemes and alternative aid instruments in other EU and EEA countries. The exact projects are to be to be decided by the evaluation body.

The assessment of the clawback mechanism will draw on administrative data on realised clawback repayments and electricity market prices to evaluate whether the clawback mechanism constrained excess revenues in high-price scenarios.

5.2. Please describe precisely the identification strategy for the evaluation of the causal impact of the aid and the assumptions on which the strategy relies. Please describe in detail the composition and the significance of the control group:

The control group will consist of the tender that did not win the auction. The quality of this control group is expected to be high due to the following factors:

1. The tenderers that did not win the auction have already demonstrated an interest in developing floating offshore wind projects.
2. All tenderers have had the opportunity to investigate the project areas and could, in principle, develop a floating offshore wind project even without winning the auction.
3. All tenderers have been qualified to have the technical and financial capacity to undertake a high-risk, capital-intensive floating offshore wind project.

The underlying assumption behind the methodological approach is that the differences identified between the beneficiary and control firms are stable over time, and that both groups are affected by common shocks during the period of interest (SWD(2014)179 final of 28.5.2014). Since the qualified tenderers operate in the same economic sector, this assumption is considered valid.

The tenderers that do not win the auction may apply for an extension of the exclusive right to the assigned project area, which provides a unique opportunity to compare the outcomes of the beneficiary to the control group. The estimated effect can then be interpreted as the effect of the State aid.

A potential disadvantage is that the control group only consist of one tenderer. With a control group consisting of only one actor, the potential for shocks that affect the losing tenderer that is not related to the State aid, and will not affect the beneficiary, could potentially bias the results.

For the reasons stated above, we conclude that the chosen methodological approach chosen is suitable and can provide valid results.

5.3. Please explain how the envisaged methods address potential selection bias. Can it be claimed with sufficient certainty that observed differences in the outcomes for the aid beneficiaries are due to the aid?

The envisaged method counters potential selection bias by not including in the control group all firms in the wind energy sector that could potentially benefit from a floating offshore wind project to be developed. The vast majority of this firm-population did not submit a qualification application for the State aid tender.

If the universe of potential firms were included in the control group this could create a downward bias, and, towards the outcome of not investing in floating offshore wind. These firms may not (yet) possess the financial and technical capabilities needed to have developed short term plans for the construction of floating offshore wind projects.

An alternative could be to include other floating offshore wind projects within Europe or under Enova's floating offshore wind scheme. In the case at hand, floating offshore projects developed at other locations across Europe would be developed at different sites with different characteristics (for instance, water depth, wind conditions, seabed conditions, etc), but also under different regulations and country-specific characteristics, which may impact the economics of individual projects. Due to these factors, the differences between floating offshore wind projects across Europe and the aided project may not be entirely due to the aid.

Instead, the envisaged method is in alignment with Commissions guideline to only use qualified but rejected applicants for state aid in the evaluation in order to avoid the selection bias (SWD(2014)).

5.4. If relevant, please explain how the envisaged methods intend to address specific challenges related to complex schemes, for example schemes that are implemented in a differentiated manner at regional level and schemes that use several aid instruments:

Under the present aid scheme, the project will not be implemented in a differentiated manner at the regional level, nor use several aid instruments.

6. Data collection

6.1. Please provide information on the mechanisms and sources for collecting and processing data about the aid beneficiaries and about the envisaged counterfactual.[25] Please provide a description of all the relevant information that relates to the selection phase: data collected on aid applicants, data submitted by applicants and selection outcomes. Please also explain any potential issue as regards data availability:

Sources for collecting and processing data about the aid beneficiaries

The beneficiary will be contractually obliged to provide the Ministry of Energy (ME) with regular reports containing data pertaining construction, progress and operation & maintenance.[26] Of concern for this evaluation plan, the beneficiary's deliverables constitute:

1. Regular status and progress reports (milestone report): The report will describe the status, performance, and control of the activities contributing directly or indirectly to the progress and success of the beneficiary's construction of floating offshore wind. Additionally, information about use of large subcontractors and research collaboration could be included in the milestone reports. This deliverable constitutes an indicator for the evaluation question whether the State aid successfully has been supporting the establishment of a cost-effective floating offshore wind, along with to what extent the aid had a positive impact on the capacity in the supply chain as well as to what extent has the project supported innovation development in floating offshore wind. The report will be submitted to ME semi-annually during the project's construction phase.

2. An Audited Annual Financial Report: The report will contain an overview of earnings and costs i.e., relating to offshore logistics and other expenses to development of floating offshore wind, or expense related to potential repayments due to the clawback mechanism. This deliverable constitutes of an indicator for three evaluation questions concerning to what extent the aid has affected the financial performance of the beneficiary, to what extent the aid had a positive impact on the capacity in supply chain and whether the aid scheme has successfully prevented overcompensation of the beneficiary.

3. Financial and economic documentation: Developers must present financing plans and cost estimates as part of the competitive procedures in Step 1 of competition for State aid. During the maturation phase and the application for the production licence, the beneficiary will submit documentation describing the expected investments, operating expenses, and projected revenue streams. In addition to beneficiary-

[25] Please note that the evaluation might require sourcing of both historical data and data that will become progressively available during the deployment of the aid scheme. Please identify the sources for both types of information. Both types of data should preferably be collected from the same source as to guarantee consistency across time.

[26] State aid notification to the EFTA Surveillance Authority from Norway article 258

provided information, publicly available data from Statistics Norway (SSB) on employment developments at the regional level will be used to assess job creation associated with the project. This information, together with the beneficiary's annual financial reporting, will provide the basis for assessing the project's economic feasibility and financial performance, and will constitute an indicator for the evaluation question concerning whether the State aid has affected the financial performance of the beneficiary and how many jobs are to be created due to the aid. The beneficiary will submit the first financial report by the end of the first full calendar year after operation start and then annually submit a new report until 1 year after the end of contract.

Sources for collecting and processing data about the envisaged counterfactual

To develop the counterfactual scenario – i.e., what would have occurred in the absence of State aid – the evaluation body will use documentation submitted by applicants during Step 1 and Step 2 of the competitive procedure, including information on expected costs, investments, financing conditions, and project risks. This information will be supplemented with relevant market data and external analyses as needed.

In addition, the evaluation body and the Ministry will gather information on comparable support schemes for immature technologies in other EU and EEA countries. These data sources will support the assessment of whether the floating offshore wind project could have been realised with lower aid intensity or with a different form of support.

6.2. Please provide information on the frequency of the data collection relevant for the evaluation. Are observations available on a sufficiently disaggregated level, which is to say at the level of individual undertakings?

The frequency of data collection is indicated in section 4. The data will be available at the level of individual undertakings (firm level).

6.3. Please indicate whether the access to the necessary data for conducting the evaluation might be hindered by laws and regulations governing confidentiality of data and how those issues would be addressed. Please mention other possible challenges related to data collection and how they would be overcome:

The beneficiary will be contractually obligated to supply the Ministry with the required data. Access to data will therefore not be hired by laws and regulations governing confidentiality of data. To the extent data is considered competitively sensitive by the beneficiary or other participants in the auction, confidentiality will be ensured also when publishing the report.

6.4. Please indicate whether surveys of aid beneficiaries or of other undertakings are foreseen and whether complementary sources of information are intended to be used:

Surveys of the aid beneficiary are not part of the envisaged data collection. There are plans to have a close collaboration with frequent meetings before and after the signing of contract of allocation of a project area and the state aid contract with the

purpose of monitoring the operation of the beneficiary activities, and to review and to monitor that the contracts are performing as required.

7. Proposed timeline of the evaluation

7.1. Please indicate the proposed timeline of the evaluation, including milestones for data collection, interim reports and involvement of stakeholders. If relevant, please provide an annex detailing the proposed timeline:

With reference to section 2.1, the competition for the award of project areas (step one), took place in 2025-2026, and the Ministry expects the monetary auction (step two) to take place during 2028-2029. The Ministry anticipates that the beneficiary's project will be in full operation in 2032-2035, depending on the development and construction time needed.

The interim report will be delivered to ESA during 2030-2031, depending on when the monetary auction is conducted. The final evaluation report will be delivered in 2032-2035, depending on when the project is in full operation. The independent expert will be selected prior to the evaluations.

The interim report will assess the results of the auction. The report will also verify whether there are any difficulties with the data collection and to test the feasibility of the methodologies. The final report will contain an analysis of the efficiency and effectiveness of the process and early assessment of the sustainability of the methodologies proposed for the overall evaluation. See section 6.21 for the planned milestones for data collection.

7.2. Please indicate the date by which the final evaluation report will be submitted to the Authority:

The final evaluation report will be summited no later than the end of the year 2035.

7.3. Please mention factors that might affect the envisaged timeline:

The envisaged timeline may be affected by the timing of the competitive procedure and the time needed for construction and consequently start of operation.

8. The body conducting the evaluation

8.1. Please provide specific information on the body conducting the evaluation or, if not yet selected, on the timeline, procedure and criteria for its selection:

The Ministry has procured the services of Oslo Economics (OE), an external and independent body/expert, to draft the evaluation plan. OE was selected using an open and competitive tender procedure based on pre-defined criteria, in compliance with the Norwegian rules on public procurement.

As the evaluation will take place over an extended period, it may be challenging to retain the same expert through the entire evaluation period. Consequently, different experts may be involved in different parts of the evaluation period. Any external and independent experts involved in the remaining parts of the evaluation period will be selected using an open and competitive tender procedure based on pre-defined criteria to ensure independence and avoid conflict of interest, in compliance with the

Norwegian rules on public procurement.

The criteria in the competitive tender(s) will ensure that the expert is independent and equipped with the relevant expertise.

8.2. Please provide information on the independence of the body conducting the evaluation and on how possible conflict of interest will be excluded during the selection process:

As stated in 8.1 the draft evaluation plan task has been entrusted to OE, which is both structurally and functionally independent from the Ministry. Similarly, the Ministry will procure an independent body to conduct the interim and the final evaluation report.

8.3. Please indicate the relevant experience and skills of the body conducting the evaluation or how those skills will be ensured during the selection process:

The criteria in the competitive tender(s) will ensure that the expert is independent and equipped with the relevant expertise. The tender criteria may include the following skillset and experience: 1) the ability to be rigorous, impartial and transparent, 2) experience in building evaluation models, 3) experience with external quality assessment and 4) experience with theory-based impact evaluation methods.

8.4. Please indicate which arrangements the granting authority will make to manage and monitor the conduct of the evaluation:

The draft evaluation plan has been carried out by an independent expert, cf. 8.1. Similarly, the Ministry will procure an independent body to conduct the interim and the final evaluation report. The Ministry will be responsible for managing the evaluation.

8.5. Please provide information, even if only of an indicative nature, on the necessary human and financial resources that will be made available for carrying out the evaluation:

The Ministry has engaged an external expert to conduct the evaluation plan cf. 8.1, which has required financial resources. Similarly, the Ministry will procure an independent body to conduct the interim and the final evaluation report. The Ministry will provide the necessary financial resources also for this purpose.

9. Publicity of the evaluation

9.1. Please provide information on the way the evaluation will be made public, that is to say, through the publication of the evaluation plan and the final evaluation report on a website:

The Ministry plans for the final evaluation plan, interim report and the final evaluation report to be published on the Ministry's website. Information which is exempt from the public's rights to document access in accordance with the Act relating to the right of access to documents held by public authorities and undertakings (Freedom of Information Act), such as business secrets, will be excluded from the public versions of the evaluation report. Nevertheless, the

Ministry acknowledges that confidentiality of this information does not extend to the results of the evaluation, which will be disclosed in full to the public.

9.2. Please indicate how the involvement of stakeholders will be ensured. Please indicate whether the organisation of public consultations or events related to the evaluation is envisaged:

The Ministry plans for the final evaluation report to be circulated among relevant bodies within the Norwegian public administration and could be subject to consultation with entities related to the energy sector.

9.3. Please specify how the evaluation results are intended to be used by the granting authority and other bodies, for example for the design of successors of the scheme or for similar schemes:

The Ministry plans to apply the evaluation results as input when designing any future tenders or competitions for state aid.

9.4. Please indicate whether and under which conditions data collected for the purpose or used for the evaluation will be made accessible for further studies and analysis:

The Ministry will make the collected data available in accordance with the statutory rules on access to public information, excluding data that constitute business secrets and raw data from detailed research.

9.5. Please indicate whether the evaluation plan contains confidential information that should not be disclosed by the Authority:

This evaluation plan does not contain confidential information.

10. Other information

10.1. Please indicate here any other information you consider relevant for the assessment of the evaluation plan:

N/A

10.2. Please list all documents attached to the notification and provide paper copies or direct internet links to the documents concerned:

Reference is made to the Aid scheme for the development of a new floating offshore wind farm in Utsira Nord, Case No. 93862.