

Public

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Dear requester

Request for Information

Thank you for your request for information which we received on 2 June 2025.

You submitted your request as a Freedom of Information request, but we consider some parts of the request and some of the information within the scope of your request to fall within the definition of environmental information as set out in Regulation 2(1) of the Environmental Information Regulations 2004 (EIR). Where the request falls within this definition, there is an exemption in the Freedom of Information Act 2000 (FOIA) (at Section 39) which has the effect of routing all requests for environmental information via the EIR rather than the FOIA. We therefore refer to both the EIR and the FOIA in our response below and have treated your request as a hybrid request. The National Grid Electricity System Operator (NG ESO) was part of the National Grid PLC group of companies until 30 September 2024 and was not subject to the Freedom of Information Act 2000 (FOIA). On 1 October 2024 ('Day 1') we became the National Energy System Operator (NESO) under government ownership (the Independent System Operator and Planner as designated in the Energy Act 2023). Regulation 14 of the Energy Act 2023 (Consequential Amendments) Regulations 2024 (SI 2024/706) amended Part 6 of Schedule 1 (other public bodies and offices: general) of the FOIA, inserting the following: "The Independent System Operator and Planner designated in accordance with section 162 of the Energy Act 2023 in respect of information held by it as a result of the exercise of its functions under, or as a consequence of, that Act." NESO has therefore been subject to the FOIA since 1 October 2024 and may refuse FOIA requests in respect of information collected, received, or created prior to Day 1. The EIR applied to NG ESO and NESO continues to be subject to the EIR.

Request

You asked us:

I request access to the following information held by NESO:

1. *Internal reports, assessments, briefing papers, or slide decks (whether in draft form or otherwise) created or received by NG ESO / NESO from 1 January 2022 to the present, which refer to the potential retirement, closure, or risk of exit of Combined Cycle Gas Turbine (CCGT) power stations built in the 1990s and 2000s.*
2. *Any internal modelling, scenario analysis, or planning assumptions regarding:*
 - *The projected closure of >10 GW of CCGT capacity by 2030.*
 - *The system security or adequacy risks arising from this potential loss.*
 - *The impact on inertia, frequency response, and reserve margin.*
3. *Any communications or joint working papers between NGESO and BEIS / DESNZ, Ofgem, or National Grid plc regarding:*
 - *The retirement of ageing CCGTs.*
 - *Policy or market mechanisms to incentivise asset preservation or mitigate closure risks (e.g. multi-year CM agreements, refurbishment criteria, or other forms of targeted support).*
4. *Any documents discussing the anticipated role of distribution-connected diesel or gas reciprocating engines as partial substitutes for retiring large-scale CCGTs – particularly in terms of:*
 - *Expected deployment or availability assumptions.*
 - *Implications for air quality, emissions, or grid balancing.*
5. *Any internal guidance or modelling assumptions concerning the carbon classification of embedded generation, including:*
 - *Whether such assets (e.g. diesel gensets, CHP) are treated as zero carbon in system-level planning or adequacy assessments or for CP2030.*
 - *Any known discrepancies between actual emissions and assumed carbon impact in embedded dispatch forecasts.*

Our response

We confirm that we hold information in scope of your request.

NESO does not hold specific reports on the closure or retirement of CCGTs based on their age or date of construction and there are currently no projected closures of >10GW by 2030.

Please note that the right of access under both the Environmental Information Regulations and the Freedom of Information Act covers recorded information held by or on behalf of NESO at the time of your request.

Published information

NESO has published analysis which includes data on CCGTs which respond to some extent to questions 1, 2, 4 and 5:

- The data workbooks for the Future Energy Scenarios (FES) show national and regional data on capacity of CCGT plants. Our latest workbook is here: [Future Energy Scenarios 2024 Data Workbook_V006_0.xlsx](#). Tab ES.23 and ED.1 show unabated gas capacity. Please note that these are scenarios only which assess the potential role of CCGTs in future, and are not an assessment of the risk of exit. More information about FES can be found here: [Future Energy Scenarios \(FES\) | National Energy System Operator](#)
- Clean Power 2030 – our report, analysis and advice to government on achieving Clean Power by 2030 are available here: [Clean Power 2030 | National Energy System Operator](#). We refer to scenarios and likely requirements in relation to unabated gas throughout the CP2030 Report and provide data within the associated documents. We do specify the need for policy and/or market mechanisms to support the supply of unabated gas in the future. Tab ES1 of [Clean Power 2030 Data Workbook_V003 \(3\).xlsx](#) shows our assumptions for CP30 on this. Again, these are scenarios only.
- Electricity Ten Year Statements – these take the future energy scenarios and then look at the loading on the system [Electricity Ten Year Statement \(ETYS\) | National Energy System Operator](#).
- The Operability Strategy Report (OSR) [Operability Strategy Report 2025 - Interactive](#)
- The Frequency Risk and Control Report [Frequency Risk and Control Report \(FRCR\) | National Energy System Operator](#). We publish related data and methodology documents, and webinar recordings are also available on our website. The FRCR2024 is the current document and has been approved by Ofgem. The FRCR2025 has been submitted to Ofgem after extensive consultation and is awaiting approval.
- Winter Outlook Reports are available on our website here: [Winter Outlook | National Energy System Operator](#). There is an illustrative scenario in the 2022/23 Winter Outlook which relates to the availability of a gas plant.
- The capacity market registers show the capacity that has already been secured until 30 September 2029 and can be found here: [Capacity Market Register](#)

Forthcoming publications

The following reports, which will also contain information that falls within the scope of your request (questions 1,2,4, and 5), are due to be published in July:

- Future Energy Scenarios 2025 (FES25)
- Resource Adequacy in the 2030s Report.

We currently hold these reports in draft format. There is an exception at Regulation 12(4)(d) of the EIR which allows us to refuse a request where it “relates to material which is still in the course of completion, to unfinished documents or to incomplete data”. This exception applies to the FES25.

We are required to complete a public interest test for all EIR exceptions. As always, we are mindful of the presumption in favour of disclosure and the general public interest in transparency and accountability. We recognise that there is ongoing public interest in and debate around energy related issues at the current time and in climate change related matters and that the disclosure of information can assist the public’s understanding of the issues and make it easier for them to participate in public debate. It is not, however, in the public interest to release information which is still in draft format as this could result in public misinformation and loss of trust amongst wider stakeholders. NESO has webinars planned for the time of publication to provide context and further explanation and has allocated staff resource for managing queries post-publication. Early publication of a draft document would be likely to result in additional and unnecessary enquiries that would also draw resource away from other key activities. Not all the FES25 report would fall within the scope of your request, but we believe that it is important to publish the report in its full and finalised format so that members of the public have the full context and full set of data. Given that these reports are due to be finalised and published very soon and are currently in the final stages of checking and assurance, we believe that the public interest lies in publishing the reports once finalised.

More information about the Future Energy Scenarios 2025 is available on our website: [Future Energy Scenarios \(FES\) | National Energy System Operator](#). You can read about our methodology and stakeholder engagement and register for online FES 25 events.

We are applying the exemption at Section 22 of the FOIA to the forthcoming Resource Adequacy report. This exemption can be used where the information is intended for future publication, which is the case for this report. Again, in terms of the public interest, we recognise the interest in transparency and accountability, but there is also a public interest in waiting a short time to ensure that the public accesses the finalised report and avoiding the publication of draft documents which could cause confusion and misinformation.

Further Information – Questions 1 and 3

In question 1 you have asked for copies of documents “which refer to the potential retirement, closure or risk of exit of Combined Cycle Gas Turbine (CCGT) power stations built in the 1990s and 2000s”. Many of our discussions, analyses, or modelling could refer to potential closures of units or types of unit as NESO considers and models a range of scenarios and pathways. We have provided links to the reports which contain information that falls within the scope of your first question, but may hold other records which include such references. These records could be held

by employees in a number of teams, as could the communications with BEIS/DESNZ, Ofgem or National Grid that you requested in your third question. We have, therefore, conducted a centralised search of our IT systems for information for data items referencing the potential/risk of closure, exit or retirement of CCGTs. This search returned over 100,000 items. We would need to go through these search results to determine which, if any, of the items fell within the scope of your request, extract and collate those items and then determine whether we needed to consider any FOI exemptions or EIR exceptions. At this stage, it is difficult to determine the extent to which the information in question would fall within the definition of environmental information and, therefore, which information would need to be considered under the FOIA, and which would need to be considered under the EIR.

Section 12 of the Freedom of Information Act allows public authorities to refuse requests which we estimate exceed the appropriate cost limit of £450. These costs are calculated at a standard staff rate of £25 per hour which equates to 18 hours of staff time. If it took just two minutes per item, this would represent over 3000 hours of staff time to review, extract and collate the information that fell within the scope of your request from the initial searches. In some cases, it would no doubt take substantially more time, particularly factoring in any time required to consult with third parties.

Unlike the Freedom of Information Act, the EIR have no appropriate cost limit, but there is provision at Regulation 12(4)(b) for public authorities to refuse a request which would place an undue burden on the organisation. Although we endeavour to be as transparent as possible and are reluctant to use this exception, in this case we do feel that the searches involved would be exceptionally burdensome for NESO.

The FOIA appropriate cost limit does not apply to the EIR, but it does provide a helpful starting point and benchmark for considering whether an EIR request would place an unreasonable burden on a public authority. We acknowledge that we are normally expected to exceed the FOIA appropriate cost limit for EIRs, but the estimate for this request would clearly require significant resource from both the Information Rights Team and the specialist teams that deal with the analysis and reporting that would be included in the information in question. This adverse effect would be particularly impactful as the teams that would need to be consulted include the teams that are currently working on finalising the FES 25 and the final report for the North Hyde substation review and other critical tasks. We are also concerned that much of the information may not fall within the scope of your request or would have very limited value and that, the resource required to review the additional search results would be disproportionate to the potential value of the further work on this request.

We note that this request was one of five that you submitted on the same day and that you have since submitted a sixth request. Overall, the effect of the combined requests is extremely burdensome, but we have concluded that the cost of further work on this request alone i.e., to determine what information is held, whether it falls under the FOIA or EIR, and whether further

exceptions apply, would be manifestly unreasonable and thereby meet the requirements of the exception at Regulation 12(4)(b).

We are required to consider the public interest for all EIR exceptions. We are mindful of the presumption in favour of disclosure as set out in the EIR and the ICO's guidance to consider extending the EIR deadline before refusing a request as manifestly unreasonable. We acknowledge the general public interest in transparency and accountability in public life. There is a public interest in providing information about energy matters in order to allow members of the public to better understand the issues, see 'the full picture' and to participate fully in public debates. We acknowledge that energy costs, security of supply and of the system, and net zero are issues that the public is particularly interested in which provides some weight to the public interest arguments in favour of disclosure.

The public interest argument in favour of the exception is that it is not in the public interest to place a disproportionate burden on public authorities and corporations and to draw resources away from the delivery of our public tasks and licensed activities.

As the ICO's guidance on FOI and EIR requests sets out, speculative requests or 'fishing expeditions' are not necessarily problematic, vexatious, or manifestly unreasonable, but does refer to the potential for such requests to impose a significant burden on public organisations by obliging us to sift through a substantial volume of information and extract the relevant details and for those requests to encompass information which is only of limited value because of the wide scope of the request. We note that a number of the other requests that you submitted include similarly broad requests which will overall have significant resource implications for NESO.

Given the estimated staff time to work through the initial search results, determine which information is relevant, consider exemptions and consult with third parties and the broad nature of your request, which is likely to include information of limited value in terms of furthering public debate and understanding, we believe that the adverse impact of the request on NESO and its resource to deliver its licenced activities and public tasks against its value and purpose is significant. We have therefore concluded that the information requested in the form of other emails, communications, and documents should be refused under Section 12 of the FOIA and Regulation 12(4)(b) of the EIR as your request exceeds the FOIA appropriate cost limit and is manifestly unreasonable. We also believe that the public interest lies in refusing this part of your request rather than extending the deadline for our response.

Further information – Question 2

NESO undertakes forecasting on potential inertia and voltage deficits and requirements. This is based on FES scenarios. The analysis is not specifically in relation to CCGTs, so does not fall within the scope of your request. The tenders provide insight into the forecasting and requirements that have been identified, although these are again, not specific to CCGTs and are neutral in terms of

technology/plant type. Our latest long term 2029 tender (for voltage, stability services):
<https://www.neso.energy/industry-information/balancing-services/stability-market/long-term-2029-tender>

Other tender documents are available on our website:

- Mersey high voltage tender: <https://www.neso.energy/industry-information/balancing-services/network-services/voltage-network-services#Voltage-Mersey>
- Pennine high voltage tender: <https://www.neso.energy/industry-information/balancing-services/network-services/voltage-network-services#Voltage-Pennines>
- Stability pathfinder phase 1: <https://www.neso.energy/industry-information/balancing-services/network-services/stability-network-services#Phase-1-concluded>
- Stability pathfinder phase 2: <https://www.neso.energy/industry-information/balancing-services/network-services/stability-network-services#Phase-2-concluded>
- Stability pathfinder phase 3: <https://www.neso.energy/industry-information/balancing-services/network-services/stability-network-services#Phase-3-concluded>
- Voltage 2026 tender: <https://www.neso.energy/industry-information/balancing-services/network-services/voltage-network-services#Voltage-2026>
- Stability Y-1 mid term market round 1: <https://www.neso.energy/industry-information/balancing-services/stability-market/mid-term-y-1-stability-market#Mid-term-Y-1-Round-1-2025-26>
- Stability Y-1 mid term market round 2 (tender live): <https://www.neso.energy/industry-information/balancing-services/stability-market/mid-term-y-1-stability-market#Mid-term-Y-1-Round-2-2026-27>
- Long term 2029 tender Voltage and Stability (tender live):
<https://www.neso.energy/industry-information/balancing-services/network-services/stability-network-services#Long-term-2029>

Further information – Question 5

We do not treat all embedded generation assets as zero carbon in system-level planning activities. For instance, the FES data workbook sets out different embedded technology types such as solar (renewable) and diesel (thermal). We account for emissions in FES and allocate emissions according to where we see the bulk activity: either power or heat. In the Clean Power Action Plan (CPAP), Combined Heat and Power (CHP) falls within the industry category as they provide heat to industry. Please note that the CPAP also categorises Major Power Producers (MPPs). The CPAP Technical Annex provides more detail: [Clean Power 2030 Action Plan: A new era of clean electricity – technical annex – GOV.UK](#). Embedded thermal units are included in adequacy modelling but allocation of technologies into zero carbon or not is less relevant to this work compared to CP30.

We publish the impact of our balancing actions on the carbon intensity of the grid here: [Carbon Intensity of Balancing Actions | National Energy System Operator](#). There is a csv file with the data and a methodology which explains how it's calculated. Please note that this represents the carbon intensity of the electricity system both before and after we have taken actions, and not the carbon intensity of our balancing actions.

We are not aware that we hold any information in relation to the part of your request relating to any known discrepancies between actual emissions and assumed carbon impact in embedded dispatch forecasts.

Advice and assistance

You may wish to refine some parts of your request in order to reduce the extent of the searches required in such a way that we would be able to allocate reasonable resource to managing the information searches and response. Questions 1 and 3 are very broad in scope. For example, a shorter timeframe can often assist in focusing searches. Framing your request as a specific question may assist us in narrowing down the information that you require and the teams that may hold that information. Requests that ask for all records which refer to or mention a particular subject, name, word or phrase tend to result in voluminous search results, whether we conduct centralised automated searches or ask employees to search their own records. Limiting your request to a particular type of record, such as minutes of meetings, may also assist us in providing a focused response. The FOIA and EIR do not require you to explain why you are requesting the information, but providing some level of description of the purpose behind the request may also assist in reducing the scope of the searches.

The discussions on policy or market mechanisms as raised in the second bullet point of question 3 are led by DESNZ. NESO has been asked to comment and advise, but our understanding is that this information is currently in draft/incomplete/unfinished format with DESNZ. Information that falls within the scope of your request may also be included in REMA related publications and consultations. We advise that you contact DESNZ regarding these discussions and any timelines for publication of further information or consultations on this aspect.

Should you submit a refined request, we would review each of the items in the search results on a case-by-case basis and are mindful of the EIR's presumption in favour of disclosure. From our discussions with colleagues, however, we anticipate that some information may need to be considered for redaction and EIR exceptions applied. For example, there is an EIR exception for internal communications which we may need to consider. Whilst some plant level data may have been derived from publicly available sources, other information will have been provided to NESO in confidence, so in the case of plant level assumptions and plant specific information, this may be commercially sensitive. We hope that these points are helpful to you, should you wish to make any further requests to NESO or other public bodies. We also advise that for any plant level data, you consider contacting the individual plants for information.

You may find it helpful to consult the Information Commissioner's website to understand the rights accorded by the Freedom of Information Act and the Environmental Information Regulations. The ICO's website provides guidance for members of the public wishing to request information: [How to access information from a public authority | ICO](#) telephone helpline and live chat service for specific queries.

This concludes our response to your request.

Next steps

If you are dissatisfied with our handling of your request, you can ask us to review our response. If you want us to carry out a review, please let us know within 40 working days and quote the reference number at the top of this letter. You can find our procedure here: [Freedom of Information and Environmental Information Regulations | National Energy System Operator](#). The ICO's website also provides guidance on the internal review process: [What to do if you are dissatisfied with the response | ICO](#).

If you are still dissatisfied after our internal review, you can complain to the Information Commissioner's Office (ICO). You should make complaints to the ICO within six weeks of receiving the outcome of an internal review. The easiest way to lodge a complaint is through their website: www.ico.org.uk/foicomplaints. Alternatively, they can be contacted at: Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

Thank you for your interest in the work of the National Energy System Operator (NESO).

Regards,

The Information Rights Team, National Energy System Operator (NESO)