

Public

Ref: FOI/25/063

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Dear requester

Request for Information

Thank you for your request for information which we received on 19 June 2025. Your request has been considered under the Freedom of Information Act 2000 (FOIA).

Request

You asked us:

Please provide copies of the following materials dated from 1 March 2025 to the present any emails, memoranda, internal letters, meeting notes, or other communications sent by NESO engineers (including but not limited to control room, grid operations, or system planning personnel) to senior managers that:

- *Express concerns, objections, or opposition to the proposed reduction of the minimum system inertia requirement (from 120 GVA.s to 100 or 102 GVA.s), and/or*
- *Any responses to the above communications from NESO senior managers, directors, or executive team members, including written acknowledgements or minutes of meetings where these concerns were raised or discussed.*

For clarity, this request includes any communications referencing the Frequency Control and Risk Report ("FRCR") or related plans to revise operational safety thresholds.

Please confirm whether any internal NESO meetings held during this period (1 March 2025 – present) included formal discussion of engineer objections to the inertia reduction, and if so, provide the titles/dates of those meetings and relevant excerpts from agendas, papers, or minutes.

Our response

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

The Frequency Risk and Control Report (FRCR) includes an assessment of the magnitude, duration and likelihood of transient frequency deviations, forecast impact and the cost of securing the system and confirms which risks will or will not be secured operationally. The requirement for a Frequency Risk and Control Report was introduced following the approval of Security and Quality of Supply Standards (SQSS) [modification GSR027](#). The first version of the report was submitted to Ofgem on 1 April 2021 and approved on 12 May 2021. The FRCR is produced at least once annually and is consulted on with industry and reviewed by the SQSS Panel ahead of submission to Ofgem. NESO held consultations March –April 2025 and submitted the FRCR to Ofgem for approval in May 2025. Related documents are published on NESO's website. The inertia requirements are set out in Section 4.1 of the [FRCR](#). We expect Ofgem to publish their decision on the FRCR on their website as they have done in previous years.

We can confirm that we hold communications between 'engineers' and senior management in which staff share their opinions on the proposed reduction of the minimum system inertia requirement and notes of meetings where opinions were given.

Internally, our staff raised broadly similar issues to those expressed by external stakeholders in our consultation process for the Frequency Risk and Control Report 2025.

We have determined that this information is exempt from disclosure and are therefore withholding this information under Section 36(2)(b)(ii) of the Freedom of Information Act, which provides an exemption for information where disclosure "would, or would be likely to, inhibit the free and frank exchange of views for the purposes of deliberation".

Exemption at Section 36(2)(b)(ii) and view of the Qualified Person

When applying the exemption at Section 36(2)(b)(ii) of the FOIA, we are required to obtain the opinion of the 'qualified person'. For NESO the designated qualified person is a Minister of the Crown. We have presented your request to the qualified person and their opinion is that the exemption should be applied.

Our position is that disclosure would inhibit the open, honest and complete expression of views and opinions by our staff. This is not limited to the exchange of views on the proposal at the centre of this request. Should the requested information be disclosed, the sharing of opinions with senior management and the willingness of a significant number of staff to contribute to free and

frank exchange of views on any topic that requires deliberation would be inhibited, thereby limiting the challenge that is provided by staff with different skill sets and levels of experience.

Any inhibition of the internal exchange of views will impair the quality of NESO's future decision making by limiting the confidence of staff to articulate their opinions through email communication and contribution to recorded meetings, limiting challenge and debate that is essential to NESO's role in the GB energy sector. It is essential for NESO to ensure that all staff are willing and able to contribute to internal discussion and debate. The quality of debate and deliberation depends on free and active participation in discussions in real time, even where concerns and questions are not fully formed or articulated.

NESO's values include accelerating progress, building trust and being curious. NESO's success lies in staff being able to discuss, debate and challenge ideas, enabling the exploration of potentially extreme options and ensuring that a range of opinions and considerations are heard. The curiosity of our staff and the willingness to ask questions of each other and challenge ideas, supports our purpose and vision. It is important that the full range of expertise, ideas, and perspectives are shared internally.

Public Interest Test

Section 36(2)(b)(ii) is a qualified exemption. This means that we are required to undertake a public interest test. This test weighs the arguments in favour of upholding an exemption against the public interest in disclosure of the requested information. The public interest in this context means what is in the interest of the public, not necessarily what the public is interested in. The public interest test has been considered following the opinion of the qualified person. When considering the public interest test, we have been mindful that the fact that the exemption is engaged by the qualified person's opinion does not automatically mean that the information should be withheld. We have objectively considered the public interest, taking full account of the arguments in favour of disclosure.

NESO recognises that there is a general public interest in disclosure of information that would promote the transparency of our decision-making processes and enhance accountability in terms of our management of Great Britain's transmission network. Consultation on the FRCR gathered external opinion as well as internal and that feedback (anonymised) is publicly available. Disclosing information on internal discussion may raise public awareness and understanding of the rigorous approach taken to decisions relating to the running of GB's electricity system and the way in which risks are considered and managed.

It is not, however in the public interest for debate to be stifled where innovation and change are implemented to ensure the security and operability of the transmission network, work towards Net Zero and achieve value for money for consumers.

Having weighed the public interest arguments for and against disclosure, we believe that the public interest lies in not disclosing individual comments made in emails, or reflected in notes of internal meetings.

Whilst NESO does not believe that disclosure of information on the themes of the deliberations would limit the free and frank exchange of views, we do not see that there is any public interest in seeing the format in which internal questions and concerns are raised, or views expressed. In our opinion, the published consultation documents, which reflect the concerns and opinions raised, sufficiently satisfy the public interest. We have been transparent throughout the development of the FRCR and have published information from webinars, our methodology, our data workbook and consultation information, including NESO's responses to issues raised in the consultation: [Frequency Risk and Control Report \(FRCR\) | National Energy System Operator](#).

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)