

Public

Ref: FOI/25/116

National Energy System Operator

Faraday House

Gallows Hill

Warwick

CV34 6DA

InformationRights@neso.energy

www.neso.energy

10 October 2025

Dear requester

Request for Information

Thank you for your request for information which we received on 12 September 2025.

Your request has been considered under the Environmental Information Regulations 2004 (EIR) as we believe that the requested information falls within the definition of environmental information as set out in Regulation 2(1) of the EIR.

Request

You originally asked:

Please share available data about the emissions per kWh or per GW from interconnectors, and the presumed mix of generation base of that electricity.

You clarified this request as:

Please share the data you hold about the associated generation emissions from and generation mix (ideally also referencing the country of origin) of electricity imported annually since 2015 and annual forecasts and expectations up to the

end of 2030. I do not mind about which days the data runs between, but my preference would be Jan 1 to Dec 31.

By way of context, you kindly explained that your request relates to querying assumptions that the energy provided to Great Britain via interconnectors is clean power.

You also asked us if NESO hold National Grid Electricity System Operator (ESO) data as your request included historical information.

Our response

We can confirm that we do retain information that was received by or created by ESO prior to the establishment of NESO on 1 October 2024. ESO was subject to the EIR and so we provide information from ESO records in response to EIR requests.

We can confirm that we hold information which falls within the scope of your request, but it would take a significant amount of time to extract all the information that we hold that falls within the scope of your request. Rather than refusing the request outright, we have provided below what can easily be made available and where we can signpost to information and have limited our use of the EIR exceptions to the additional information that would place an unreasonable burden on NESO. You can then decide whether you want to ask for additional information but would need to refine your request.

- ESO published some related information on interconnectors in our March 2024 Interconnector Analysis Report here: [download](#).
- Specific emissions and the generation mix of electricity imported into Great Britain from a connecting country are concerned with this connecting country and not GB according to international carbon accounting processes. NESO does not hold this information, but, as this carbon is accounted for in the source country this information should be held by the country's specific Transmission System Operator (TSO) or government. ENTSO-E, the European Network of Transmission

System Operators for Electricity lists the European TSOs on its website: [About ENTSO-E](#).

- The requested historical data which concerns metering is already routinely published via the Elexon portal provides information relating to the historic GB>European interconnector flows: <https://bmrs.elexon.co.uk/interconnector-flows>. This Elexon data is based on NESO data, but Elexon are responsible for publishing it and it is easily accessible and regularly updated, so we advise accessing the information from Elexon.
- We can also provide information located in the ES2 tab in the Future Energy Scenarios (FES) data workbook, this holds data on assumptions by country for electrical demand and generation mix. Please see: [Future Energy Scenarios 2025 Data Workbook V004.xlsx](#). The FES pathways are set out on page 20 of the FES [Future Energy Scenarios 2025: Pathways to Net Zero](#). For further related information on FES, please see the FES 2025 document suite and the archive of older FES documents here: [FES Documents | National Energy System Operator](#).

NESO does hold further information relating to the generation mix in connecting countries and the associated emissions, however, we do not extract this as part of our routine processes, so it is not held in a readily accessible format. We estimate that extracting this information from our modelling to fully meet the scope of your request would take a significant amount of staff time. In addition, we hold data that Elexon uses to create the information referenced above. If you are happy to use the Elexon reports that would reduce the amount of staff time required to respond to your request in full, but even without this information, we would still need to apply the exception to the rest of the data held in terms of extracting all information that falls within the scope of your request.

Exceptions

Where we have stated that we do not hold the requested information, this falls within the EIR exception at Regulation 12(4)(a). Although we are required to conduct a public

interest test for all EIR exceptions, the Information Commissioner recognises that this is difficult for this particular exception. This exception does mean that we are not required to create new information in order to respond to an EIR request.

Regulation 12(4)(b) of the EIR allows a public authority to refuse a request where the request is “manifestly unreasonable”. We are grateful to you for clarifying your request and are in no way suggesting that your intention is unreasonable, but we have determined that responding to your request will impose a disproportionate burden and unjustified level of disruption to NESO because the information is not held in a readily accessible format.

NESO endeavours to consider all elements of the FOIA and EIR when responding to a request for information. We are mindful of the differences between the two sets of obligations, the presumption in favour of disclosure that applies to the EIR, the requirements to conduct public interest tests, and the guidance on cost limits. In particular, we do not simply equate the FOI appropriate cost limit of £450 which equates to 18 hours of staff time at the standard rate of £25 per hour, with the time/cost burden under the EIR exception at Regulation 12(4)(b). However, as the ICO guidance sets out, whilst the FOI fees regulations do not apply to requests made under the EIR and public authorities may be required to accept a greater burden when providing environmental information than under the FOIA, “we take these regulations to give a clear indication of what Parliament considered to be a reasonable allocation of resources when dealing with requests in terms of staff time.” Even without compiling the information that the Elexon report is based on, our teams have confirmed that extracting the additional information would take well in excess of 18 hours of staff time.

The exception in regulation 12(4)(b) is subject to the public interest test. There is a general public interest in public organisations being accountable and transparent. Disclosure may increase public understanding of decision making, facilitate effective public participation in current debates about decarbonisation and about the use of interconnectors as part of the GB energy mix. NESO is always mindful of the presumption in favour of disclosure under the EIR.

Public authorities must, however, be protected from any disproportionate burden caused by requests for information. It is not in the public interest for NESO's resources to be diverted away from delivery of our public tasks and licensed activities. Despite the presumption in favour of disclosure, the excessive burden of responding to your request means that we conclude that the public interest lies in maintaining the exception in Regulation 12(4)(b) of the EIR.

Advice and assistance

In terms of your underlying question and the aim of your request, we think that we have provided information about carbon accounting and have provided data from our FES data workbook which shows our assumptions about the generation mix by country. We have also signposted you to data about historical interconnector flows. We think that this may be sufficient information to meet your stated aims.

Regulation 9 of the EIR requires a public authority to provide advice and assistance. You may wish to refine your request in such a way that we would be able to allocate reasonable resource to managing the extraction and review of the information held beyond that which we have provided in this response.

Narrowing down the request to a particular country or shorter time frame may be helpful. The FES data workbook may also assist you in considering what, if any, further information you require.

Should you submit a refined request, we will consider it as a new request under the information rights legislation.

In addition to the information provided above, we would like to signpost you to the following information sources:

- You can find information on carbon emissions on the government's website: [Greenhouse gas emissions – GOV.UK.](#)

- A previous government publication on interconnectors and carbon emissions that includes an explanatory section on carbon accounting which you may find helpful is available here: [The impact of interconnectors on decarbonisation](#).
- Details of how to submit a request for information to the Department for Energy Security and Net Zero (DESNZ) under the FOIA or EIR can be found here: [Department for Energy Security and Net Zero – GOV.UK](#).

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 conduct 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)