

Public

Ref: FOI/25/128

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Dear requester

Request for Information

Thank you for your request for information which we received on 29 September 2025.

Your request has been considered under the Environmental Information Regulations 2004 (EIR) as we believe that information relating to the Transitional Centralised Strategic Network Plan falls within the definition of environmental information as set out in Regulation 2(1) of the EIR.

Request

You asked us:

This is a request for information under the Freedom of Information Act 2000 for:

Any calculations (and their outputs) undertaken by the National Energy System Operator to estimate the constraint payments avoided by the construction of each of the transmission cable projects that are recommended in the tCSNP or HND.

For clarity, by “constraint payments avoided,” I mean the quantified benefits (in monetary or other terms) used by NESO in its analysis to demonstrate how each planned line of transmission will reduce or mitigate future constraint costs in the energy system.

I am aware that you have released the expected overall impact of the tCSNP (thank you!) but would be grateful if you could provide the information broken down by project/line, and in the

same form or format in which the NESO holds the calculations (for example, in Excel, CSV, or other structured datasets). If explanatory notes, methodology, or assumptions underpinning these calculations are also held, please include them.

Our response

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

The [Transitional Centralised Strategic Network Plan](#) (tCSNP) provides our recommendation for which network reinforcement projects should receive investment and when. The tCSNP is a bridge from the Network Options Assessment (NOA) to a new long term strategic approach to future transmission network planning through the Centralised Strategic Network Plan (CSNP). We have published two tCSNP reports so far:

- [Pathway to 2030 Holistic Design Network](#) (HND) published in July 2022.
- [Beyond 2030](#) published in March 2024.

Further information on the methodology for the tCSNP reports is available in the following documents:

- [Holistic Network Design Methodology](#) is a standalone document providing further detail on the design approach. Information about the economic assessment can be found on pages 17 to 21.
- [Our Beyond 2030 Technical Report](#) sets out our holistic design considerations for both our onshore and offshore network recommendations in greater details. It outlines the benefits of each of our shortlisted offshore network designs and how we made our final recommendations.
- The [tCSNP methodology](#) describes the onshore economic assessment process with current and previous methodology versions available.

In terms of your request for the calculations on constraint payments avoided by construction of each of the projects recommended in Beyond 2030 or HND, we are relying on the exception in Regulations 12(5)(d) of the EIR. Regulation 12(5)(d) allows a public authority to withhold information to the extent that its disclosure would adversely affect the confidentiality of proceedings where such confidentiality is provided by law.

Before we explain the rationale for the use of this exception, it is important to note that responses to requests under both the EIR and the FOIA are considered to be disclosures into the public domain rather than private or limited disclosures to an individual requester. When reviewing the

requested information, we are therefore required to consider the consequences of disclosing the information to the wider public.

Proceedings include situations where a public authority is exercising its statutory decision-making powers. The requested information was used to make recommendations to Ofgem as part of our statutory and licensed duties. Our Beyond 2030 report explains that:

- The network options process was undertaken in collaboration with the Transmission Owners (TOs), assessing nearly 200 different design options.
- We arrived at our recommendations through extensive engagement with stakeholders, which includes (but is not limited to) TOs, Ofgem, the Department for Energy Security and Net Zero and devolved governments.
- The recommendations had gone through an internal governance process and been formally approved through that process.

NESO is bound by the confidentiality obligations under the System Operator Transmission Owner Code (STC) when we receive information for the purposes of our system operator business.

NESO also falls within the scope of the Utilities Act 2000 and Section 105 of that Act makes it a criminal offence to disclose information: a) obtained under the Utilities Act 2000 and any other key energy legislation such as the Gas Act 1986 and the Electricity Act 1989, subject to specific exceptions; and b) where the information relates to the affairs of any individual or any particular business during the lifetime of the individual or so long as the business continues to be carried on.

In our opinion, the requested information, which is held for the purposes of the NOA/tCSNP, is subject to the restrictions at Section 105 of the Utilities Act and does not fall within any of the limited exceptions to that duty of confidentiality. Beyond this, there is also a common law duty of confidentiality based on the expectations of the Transmission Owners.

The network recommendations in Beyond 2030 are of varying maturity. The relevant TOs and associated developers are currently undertaking the Detailed Network Design (DND) process. This encompasses the refinement of the recommended network reinforcements, and includes community engagement, the identification of transmission routes, further engineering design and the selection of specific technologies required. Disclosure of the requested information, particularly while the DND, planning and consenting phases are ongoing, would have a negative impact on the tCSNP process.

All exceptions in the EIR are subject to a public interest test.

NESO is mindful that the EIR requires us to apply a presumption in favour of disclosure when considering the public interest test. There is a public interest in NESO, as a public corporation, being accountable for its advice and recommendations. We also recognise that there is a public interest in local residents having information about changes to infrastructure which may impact on their local communities and the environment and during planning processes.

The public interest in maintaining the exception is that third parties would be discouraged from confiding in public authorities if they did not have some assurances that confidences would be respected. In order to fulfil our statutory and licence obligations as the independent system operator and planner under the Energy Act 2023, we must remain independent, fair, and consumer focused. Disclosure is likely to harm the relationship between NESO and TOs and would be likely to reduce trust in NESO more widely in the energy sector. If suppliers of information are concerned about the disclosure of the information, and feel that they cannot trust NESO, such that they are unwilling to provide information in the future, this would be likely to have a detrimental effect on NESO's ability to carry out our role, which would not be in the public interest.

Having weighed up these public interest arguments and mindful of the criminal offence under the Utilities Act, our opinion is that the balance of the public interest lies in maintaining the exception and withholding the requested information. We published the BRAG (Black, Red, Amber, Green) assessment for the community, environment, and deliverability and operability objectives, and the economic assessment, for each network design and specific reinforcement in our Beyond 2030 Technical Report. Our recommendations relate to a combination of reinforcements and requirements, so the assessments very much need to be viewed within the context of the whole system and other reinforcements and projects recommended by NESO.

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)