

Public

Ref: FOI/25/130

National Energy System Operator
Faraday House
Gallows Hill
Warwick
CV34 6DA

InformationRights@neso.energy

www.neso.energy

29 October 2025

Dear requester

Request for Information

Thank you for your request for information which we received on 3 October 2025.

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

Request

You asked us:

Scope & timeframe: From 1 January 2025 to 30 September 2025

Requested materials (or redacted versions thereof):

- 1. Any models, forecasts, analyses, briefing notes, presentations, or internal correspondence regarding projected electricity demand from AI / hyperscale / large data centre projects in Great Britain.*
- 2. Any assessments or scenario work examining the impact of that demand on grid access, transmission capacity constraints, congestion, reinforcement requirements, system balancing, or flexibility needs.*

3. *Internal memos, correspondence, or briefings to senior NESO management, or to government / DESNZ / Ofgem, concerning risks, options, or mitigation strategies relating to data centre load growth.*
4. *If full disclosure is withheld, please provide a list of held documents (title, date, authoring team), and/or redacted extracts or summaries sufficient to understand the key arguments and assumptions.*

Our response

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

In January 2025, NESO completed an innovation project to understand the potential for data centre growth within GB, the grid connection challenges and potential innovative solutions to explore further, thereby aiding our future planning. The outcomes of the project were as follows:

- The resulting demand scenarios have provided useful insight which have fed into Future Energy Scenarios (FES) 2025.
- It has also been used to inform the recommendations in the Government's AI Opportunities Action Plan.
- The report and findings were considered when the decision on the Strategic Spatial Energy Plan (SSEP) approach to modelling data centres was being made. Specifically, it was used to understand the 2030 vision and projected capacities, as well as expected latency requirements of data centres (percentage of capacity that is locationally flexible). This information supported us during our engagement with government, as well as industry stakeholders.
- The outputs of this report are being used, alongside input from elsewhere, to consider implications for future connections processes.

Further information about this project is available here: [Options for optimising GB Data Centres | ENA Innovation Portal](#). Our [Future Energy Scenarios 2025: Pathways to Net Zero](#) report includes an overview on data centre demand on pages 110 to 113. Information on how data centres will be considered in the [Strategic Spatial Energy Plan](#) (SSEP) can be found in Section 3.3.7 of our [SSEP final methodology](#) and Appendix 6 of [Strategic Spatial Energy Plan Methodology Appendices](#).

In terms of your specific request, we are refusing it under the exception in Regulation 12(4)(b) of the Environmental Information Regulations 2004 (EIR). Regulation 12(4)(b) of the EIR allows a public authority to refuse a request where the request is manifestly unreasonable. While we are in no way suggesting that your intention is unreasonable, we have determined that responding to your request will impose a disproportionate burden and unjustified level of disruption to NESO.

We are generally expected to focus our search for information in the locations where it is most likely to be held. The best approach is usually to ask the appropriate staff directly involved to search for material in scope of a request. However, as you have asked for information in many different record types that could be held by multiple operational teams (e.g., particularly as you have requested information about the impact of demand on grid access, transmission capacity constraints, congestion, reinforcement requirements, system balancing, or flexibility needs), we cannot limit our search to a particular team.

To undertake the required searches, we would need to ask staff in at least six NESO directorates to search their records for information in scope of your request (Digital, Data and Technology; Engineering and Customer Solutions, Resilience and Emergency Management, Strategic Energy Planning, Strategy and Policy, and System Operations). This would equate to more than 1,500 staff (FTE). Even if it only took an average of 15 minutes for each staff member to interrogate their records to determine whether they hold information in scope of the request and then to retrieve that information, these activities would take 375 hours of staff time. As explained below, the Information Rights Team would then need to review any records identified individually.

Alternatively, we could undertake a centralised search of NESO's Microsoft tenancy. In considering your request, we have undertaken sample searches of mailboxes between the dates stated in your request. These searches may include documents attached to emails, but were not centralised searches across SharePoint, so the results are likely to be a conservative estimate. These searches returned:

- 71,724 items containing the terms 'electricity demand' AND ('data centre' OR 'AI' OR 'artificial intelligence').
- 1,185 items containing the terms 'electricity demand' AND ('data centre' OR 'AI' OR 'artificial intelligence') that include at least one participant with a @energysecurity.gov.uk or @ofgem.gov.uk email address.
- 881 items that include the title of the innovation project ("Options for optimising GB data centres" OR NIA2_NESO098).
- 227 items where the subject is 'data centre' and that contain the terms 'electricity demand' AND ('data centre' OR 'AI' OR 'artificial intelligence').

We consider that centralised searches are either likely to (1) capture a large volume of irrelevant items, because the terms referenced in your request are commonly used in NESO (e.g., 'electricity demand', 'data centre', and 'AI'), or (b) exclude relevant material because 'data centre' wasn't referred to in the subject line of an email. We therefore consider that asking staff directly is the

most accurate approach, but these search results do give a further indication of the volume of information involved.

Whichever approach is taken, the Information Rights Team would be required to review each identified record individually to determine whether a) it is indeed in scope; b) whether it is all / partially disclosable or c) whether any of the EIR exceptions may be applicable. This is necessary to ensure information is not disclosed inappropriately, for example where we have a statutory obligation of confidence or where it would cause a risk to national security. A conservative estimate would be that this would take a minimum of 10 minutes per item, although it is likely that for some items the Information Rights team would be required to consult with subject experts within NESO and with external third parties to determine whether any exceptions apply.

The ICO's guidance on FOI and EIR requests is clear that speculative requests for information are not necessarily problematic, vexatious, or manifestly unreasonable. However, it does refer to the potential for such requests to impose a significant burden on public authorities where they require sifting through a substantial volume of information to isolate and extract the relevant details, encompass information which is only of limited value because of the wide scope of the request, or require a considerable amount of time to be spent considering any exemptions and redactions.

We have considered your request to be provided with a list of documents if full disclosure of the information isn't possible. However, for the reasons explained above, even locating the information and compiling a list would itself be overly burdensome.

The exception in regulation 12(4)(b) is subject to the 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 activities to deliver plans, manage, and run the energy system. There is a public interest in furthering public understanding of the costs and assumptions used in the development of public energy policy, planning and investment. NESO recognises that there is a public interest in the impact of data centre growth on energy consumption, sustainability, efficiency and grid connectivity.

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 the public interest lies in maintaining the exception in Regulation 12(4)(b) of the EIR. This is because we believe that to respond to your request would represent a disproportionate burden on the organisation and its staff (both in terms of cost and time), and the speculative nature of this request means that we cannot clearly determine that the value or purpose of the request would justify the burden.

We are mindful that the ICO's guidance recommends that before applying Regulation 12(4)(b) solely because of cost or burden, a public authority should consider whether it's more appropriate to rely on regulation 7(1) of the EIR to extend the time for complying with a request. However, we have concluded that an extension would not be sufficient in this case.

NESO makes a wide range of information publicly available and engages with the public on a wide range of issues. In the advice and assistance section below, we have suggested how you could refine your request to make it more manageable for us to respond to.

This concludes our response to your request.

Advice and assistance

Regulation 9 of the EIR require 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 review of information held.

We have provided links to publicly available information about the innovation project, the FES overview on data centre demand and SSEP methodology that may assist you to narrow the focus of your request. 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. 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.

Requests that ask for 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. Requests for all internal and/or external correspondence also tend to result in large volumes of records, many of which are unlikely to be relevant to a requester.

In addition to the links provided above, we publish updates about our all strategic planning activities here: [Strategic energy planning \(SEP\) publications, consultations and updates | National Energy System Operator](#). We run a number of events, including the weekly operational transparency forum, details of which are available here: [News and events | National Energy System Operator](#).

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

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)