

Public

Ref: FOI/25/148

National Energy System Operator

Faraday House

Gallows Hill

Warwick

CV34 6DA

InformationRights@neso.energy

www.neso.energy

18 November 2025

Dear requester

Request for Information

Thank you for your request for information which we received on 21 October 2025.

You submitted your request under the Freedom of Information Act 2000 (FOIA). We have determined that the information you have requested, if held, would meet the definition of environmental information as set out in Regulation 2(1) of the Environmental Information Regulations 2004 (EIR). The exemption at Section 39 of the FOIA covers information that a public body is obliged to consider under the EIR and has the effect of routing all requests for environmental information via the EIR rather than the FOIA. Your request has therefore been considered under the Environmental Information Regulations 2004 (EIR).

Request

You asked us:

... I request disclosure of the following information held by National Grid ESO between 1 January 2009 and 31 December 2013:

- 1. Grid infrastructure constraint forecasts, connection timelines, and reinforcement plans used in conjunction with the Fourth Carbon Budget modelling.*

2. Internal assessments or communications acknowledging delivery risks for CCS, nuclear, or renewables deployment assumed in the model.

3. Any post-2011 reviews noting divergence between modelled capacity build-out and actual network capability.

This request is limited to modelling assumptions and reviews directly relevant to the Fourth Carbon Budget period

Our response

We are unfortunately unable to progress your request any further at this time without clarification.

We are therefore engaging the exception at Regulation 12(4)(c) of the EIR which allows for a public authority to refuse a request where it is formulated in too general a manner. This exception applies where a request is unclear or open to more than one interpretation and the public authority has provided advice and assistance to help the requester to provide clarification.

The Regulation 12(4)(c) exception is subject to the public interest test in the EIR. However, the Information Commissioner recognises that it is difficult to conduct a public interest test when a public authority is unsure about what the applicant is after. The Commissioner therefore takes the position that the public interest in maintaining the exception will outweigh the public interest in disclosing what may be the wrong information.

Please see the 'advice and assistance' and 'next steps' sections of this letter which we hope will assist you to reformulate your request, should you wish to do so.

This concludes our response your request.

Advice and assistance

You have requested information dating from 2009 to 2013. At that time, GB's electricity system operator was part of National Grid. The National Grid Electricity System Operator (NG ESO) became a legally separate company within the National Grid PLC group in 2019. NG ESO remained part of the NG group until 30 September 2024. On 1 October 2024 we became the National Energy System Operator (NESO) under government ownership (the Independent System Operator and Planner as designated in the Energy Act 2023).

A carbon budget places a restriction on the total amount of greenhouse gases the UK can emit over a 5-year period. As you are aware, the Fourth Carbon Budget period is 2023–2027.

The Committee on Climate Change (the CCC) is an independent statutory body which was established under the Climate Change Act (2008) to advise UK and devolved administration governments on setting and meeting carbon budgets and preparing for climate change. Their advice on the Fourth Carbon Budget was published in December 2010:

- [The Fourth Carbon Budget – reducing emissions through the 2020s – Climate Change Committee.](#)

The Technical Report is also available:

- [1785b-CCC_TechRep_Singles_Book_1.pdf](#)
 - For information, one National Grid report is referenced in the Technical Report and is available via the Government website: [National Grid EMR Analytical Report \(July 2013\)](#)

Government agreed the Fourth Carbon Budget in June 2011:

- [The Carbon Budget Order 2011](#)

The CCC published a two-part review of the Fourth Carbon Budget in November and December 2013:

- [The Fourth Carbon Budget Review – part 1: assessment of climate risk and the international response – Climate Change Committee](#)
- [The Fourth Carbon Budget Review – part 2: the cost effective path to the 2050 target – Climate Change Committee](#)
 - This document refers to the National Grid 2013 Future Energy Scenarios which are available in the FES archive and may be of interest:
[https://www.neso.energy/publications/future-energy-scenarios-fes/fes-documents.](https://www.neso.energy/publications/future-energy-scenarios-fes/fes-documents)
(FES is now a NESO publication).

Should you submit a clarified request please be aware that we will only be able respond with any recorded information that is held by NESO at the time of the request, subject to the engagement of any appropriate exceptions.

As we have determined that your request is unclear, we have provided assistance in the section above in an effort to help you more clearly explain the information you are seeking.

We recognise that you are interested in information created between 2009 and 2013 that relates to the Fourth Carbon Budget period i.e., 2023–2027. However, we are unclear about the specific

nature of the information you are seeking. We are not sure if you are seeking information that may have been provided by National Grid (and that is now held by NESO) to the Committee for Climate Change for the purposes of their advice on the Fourth Carbon Budget, or if you are seeking information on National Grid's use of the Fourth Carbon Budget advice (again, as recorded at the time and now held by NESO).

In relation to Q3 you have asked for 'post-2011 reviews'. For clarity, please could you confirm that this is a request for information on any reviews carried out between 2011 and 2013.

There is no obligation for any requester to explain their aims or motivations when submitting an information request, but if you believe it might help us to understand the information you are interested in you may choose to do so.

Next steps

When a public authority requests clarification on a request for information there is no further obligation to respond to that request until clarification is provided.

We will manage any clarified request as a new request under the information rights legislation, responding as soon as possible and within 20-working days of receiving that clarification. Information requests should be sent to InformationRights@neso.energy.

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)

