

## Public

Ref: FOI/25/162

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Dear requester

## Request for Information

Thank you for your request for information which we received on 3 November 2025. Your request has been considered under the Environmental Information Regulations 2004 (EIR).

## Request

You asked us:

*The [Hydrogen Infrastructure Strategic Planning Policy Statement](#) states 'DESNZ has shared modelling assumptions with NESO covering the full hydrogen value chain. These include costs, technical parameters and limitations for different technologies related to hydrogen production, transport and storage, as well as national-level demand assumptions for industry, transport and potentially heat'.*

*Please share the content of what was shared to you (I am not requesting the communication around the sharing of the content) in regard to the above. I presume the modelling assumptions will not be shared in a future publication, but if they will be – in their entirety – please let me know when. Other I expect that which will not to be shared in future, to be transparently disclosed now.*

## Our response

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

We have determined that the exception provided at Regulations 12(5)(e) of the EIR is engaged, and we are therefore refusing disclosure of the requested information.

Regulation 12(5)(e) allows public authorities and public corporations to withhold information where disclosure would adversely affect *“the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest”*.

The requested information was provided to NESO in confidence for the permitted purpose of use in connection with the production of the Strategic Spatial Energy Plan (SSEP). Confidentiality is therefore provided by law under common law confidentiality.

NESO has been advised that the modelling assumptions shared with NESO will be used by DESNZ during allocations for the future hydrogen business models. Disclosure of the information within the modelling assumptions would therefore be likely to adversely affect DESNZ’s negotiating positions and commercial interests during future business model allocation rounds.

All exceptions provided by the EIR are subject to a public interest test. When an exception is engaged, we must consider where the public interest lies before deciding whether to disclose the information. Disclosure can be refused when the public interest in maintaining the exception outweighs the public interest in disclosure.

NESO is mindful that the EIR requires us to apply a presumption in favour of disclosure when considering the public interest test.

We are conscious that there is a general public interest in transparency and accountability in terms of the activities of public sector organisations and public corporations, and the information used in decision-making and the fulfilment of those duties.

Information about future plans for GB’s energy system and the transition to clean, affordable and secure energy, is very much a subject of public interest and debate, and there is a public interest in furthering public understanding of how NESO develops those plans and the information used within that modelling.

Given the role the SSEP will play in underpinning the future of energy in GB, NESO is ensuring transparency by publishing data and information where it is appropriate to do so: [SSEP Transparency Update \(May 2025\)](#). An overview of the [data sources used for inputs](#) to the SSEP is available on our website (including links to datasets where possible and explanations where this is not possible).

There is however a strong public interest in the Government being able to ensure value for money and negotiate robust contractual terms with providers who operate within a competitive energy market within Great Britain, and it is not in the public interest to disclose information that will adversely affect such negotiations.

We are also aware that DESNZ are aiming to publish some information within the requested modelling assumptions before the end of the year.

Having weighed up the public interest arguments, we have concluded that the balance of the public interest lies in maintaining the exception and withholding the requested information that has been provided to NESO in confidence.

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](http://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)