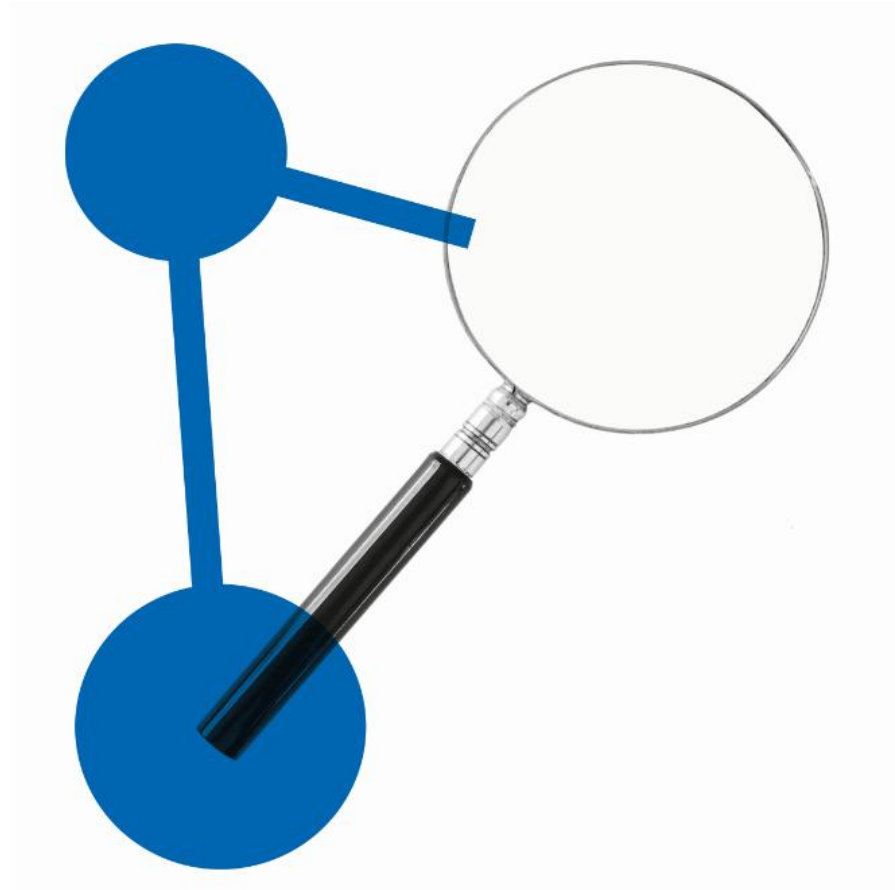




## **National Energy System Operator**

### **Whistleblowing Investigation**

Final Report

**19 October 2026**

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# 1. INTRODUCTION

- 1.1 This Report has been prepared as a result of an independent investigation conducted by Eversheds Sutherland (International) LLP ("**ESI**") into alleged whistleblower contact received by the Shadow Secretary of State for Energy, The Right Honourable Claire Coutinho MP ("**CCMP**") in respect of record management practices within the Electricity National Control Centre ("**ENCC**"), managed by the National Energy System Operator ("**NESO**"), as detailed further below. The investigation was conducted independently of the NESO Executive and reported directly to an independent panel comprised of three independent members: Jayne Scott, Chair of NESO's Audit and Risk Committee and a Non-Executive Director of the NESO Board; Akshay Kaul, Ofgem Director General for Infrastructure; and Siobhan Duffy from UKGI in her role as representative of the shareholder on the NESO Board (the "**Panel**"). Ms Scott chaired the Panel.

## Brief chronology

- 1.2 During the week commencing 22 June 2026, Great Britain experienced a period of extreme heat. The combination of unusually high temperatures across Great Britain and Europe, lower wind generation, and reduced availability from some generation assets created tighter operating margins than normal. When margins are tight, the ENCC is required to take certain actions and make requests to stakeholders, in order to alert the market and attempt to bring the system back into balance (i.e. where supply is able to meet demand).
- 1.3 One such mechanism available to the ENCC is to issue an Electricity Margin Notice ("**EMN**"). An EMN is a routine market mechanism used to alert the market to tight conditions, and request a greater volume of energy to meet the operating margin. The decision to issue an EMN is made by the Power System Manager, and is based solely on operational and engineering judgement. An EMN does not, however, automatically mean that electricity supply as a whole is at risk. EMNs are issued up to 24 hours in advance of the anticipated peak, as they are intended as a warning and to encourage a response from the market. They are not issued in real-time, to address a real-time risk.
- 1.4 During the week commencing Monday, 22 June 2026, no EMN was issued on 22 June, for 23 June. EMNs were however issued on 23 June, for the evening peak on 24 June 2026 and on 25 June for the anticipated peak on 26 June 2026.
- 1.5 On 07 July 2026, CCMP wrote to the Information Commissioner ("**ICO**")<sup>1</sup> Paul Arnold MBE, requesting that he launch an inquiry into NESO's records management practices, interview operations managers regarding alleged information concealment, and take action to ensure

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<sup>1</sup> NESO is a public corporation subject to the Freedom of Information Act 2000. As a publicly owned body, its operations are subject to parliamentary oversight, regulatory scrutiny, and FOIA obligations.

NESO's compliance with information transparency regulations. The full text of this letter is set out at **Appendix A**.

- 1.6 On 09 July 2026, Zoe Morrissey, NESO Director of Legal and Regulation, initially instructed ESI to conduct an independent investigation following the alleged whistleblower contact received by CCMP.
- 1.7 On 10 July 2026, CCMP sent a further letter to NESO's CEO, Fintan Slye, repeating the allegations as made to the ICO, asserting that additional whistleblowers had come forward, and posing seven specific questions concerning the events of 23 June 2026 and NESO's operational and whistleblowing practices. The full text of this letter is set out at **Appendix B**.
- 1.8 On 20 July 2026, the Director of Freedom of Information & Transparency at the ICO responded to CCMP setting out the ICO's position and confirmed that the ICO could not address CCMP's concerns. A copy of this letter is at **Appendix C**. On the same date the Panel was constituted and thereafter instructions were provided to ESI by the Panel.
- 1.9 This investigation was established and conducted independently of the NESO Executive. Separate reporting and governance structures were established immediately following commencement such that ESI reported directly to the Panel. Further detail on the governance and methodology adopted by ESI is set out in **Section 3: The Investigation Process** below.

## Terms of Reference

- 1.10 As a result of the above communications and the requests contained therein, ESI was instructed to investigate whether:
  - 1.10.1 NESO has been deliberately altering operational records to avoid public scrutiny under Freedom of Information ("**FOI**") laws;
  - 1.10.2 During periods of system stress, senior NESO managers have instructed operators in the Electricity National Control Centre ("**ENCC**" or the "**Control Room**") to keep 'live documents' with no version history to ensure there is no audit trail or records of how key operational decisions are made and to ensure records are not preserved for the purpose of FOI;
  - 1.10.3 The aforementioned approach was in effect during an incident on Tuesday 23 June 2026 where system frequency became unstable, and fell below normal operating frequency limits set out in the Security and Quality of Supply Standard ("**SQSS**") limits; and
  - 1.10.4 To avoid reputational damage, Corporate Affairs personnel interfered in operational decisions to urge that certain operational stabilising actions were not

taken and that due to the use of 'live documents', these interventions were not recorded for public record.

- 1.11 The full Terms of Reference ("**ToR**") for this investigation are attached at **Appendix D**.

## Technical Review

- 1.12 The Office of Gas and Electricity Markets ("**Ofgem**") (the energy regulator in Great Britain) has commissioned NESO to review the circumstances surrounding the notable events of the week commencing 22 June 2026 (the "**Technical Review**"). The Technical Review was commissioned to include market conditions, electricity system performance, market participant behaviour, NESO decision making and supporting records, and to assess the system status against all relevant security standards during these periods. The terms of reference for the Technical Review, dated 17 July 2026, are available on Ofgem's website and are attached at **Appendix E**.
- 1.13 In light of the Technical Review, ESI's investigation (and this Report) is limited to the allegations as summarised within the ToR. This investigation does not seek to make any regulatory determinations, including whether the electricity system was secure during the week commencing 22 June 2026. Any such determinations will be considered and made by Ofgem, following the Technical Review.

## The Control Room

- 1.14 Before addressing the ToR and our findings in detail, we set out details of the work of the Control Room, a summary of the structure, and an explanation of the key roles and responsibilities, as these provide a basis for our findings.
- 1.15 The Control Room engineers and managers work around the clock to make sure that the right amount of electricity gets to where it is needed, when it is needed. The Control Room looks 24 hours ahead to make sure it has accurate, constant forecasts, responses to consumer demand and resolution to any operational issues. The teams work on shift patterns with timescales roughly broken into 24 hours, 12 hours and 4 hours intervals.<sup>2</sup> A brief description of each stage is set out in the table below.

| Timescale                | Action                                                                                                                                        |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| More than 24 hours ahead | There is a demand forecasting team, whose primary purpose is to work out the demand forecast for the day and feed this into the control room. |
|                          | To match supply with demand the team needs to remove or add electricity to the system. The closer the system                                  |

gets to real-time, the more important it is to make sure that match is as accurate as possible to keep the frequency stable.

The demand forecasting team begins by looking at demand weeks in advance. As real-time gets closer, the team begins to refine those forecasts up to 24 hours before real-time electricity dispatch.

|                            |                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 24 to 4 hours ahead        | The strategy team looks 24 hours to four hours ahead of real-time dispatch. They identify plans for how the network will run, including what circuits are or are not available. They also look at what generation is available to meet real-time demand.                                                                                                                  |
| 4 hours ahead to real-time | The energy team is the team that carries out the actual electricity dispatch, or the minute-by-minute and second-by-second balancing of electricity supply and demand. They are in charge of real-time scheduling on the system, working four hours ahead to real-time. This team relies on the planning of all ENCC teams before them for an accurate view. <sup>3</sup> |

- 1.16 The Control Room operates on a 24/7 shift pattern with multiple shift teams (designated A through to E). Shift patterns include morning (07:30 – 14:30), evening (14:30 – 19:30) and night (19:30 – 07:30). Weekends are covered by two 12 hour shifts (07:30 – 19:30 and 19:30 – 07:30).
- 1.17 The Control Room is split across two sites: Control 1 (main) and Control 2 (satellite). All staff must arrive 20 minutes before shift change handover. The outgoing team retains operational responsibility until handover is completed, and handover should be uninterrupted. Non-operational staff are excluded from the Control Room during handover periods.
- 1.18 All positions within the Control Room require annual authorisation review. Staff are encouraged to hold multiple authorisations but are generally limited to approximately three positions.
- 1.19 The Control Room is comprised of various different roles, including those listed below and each shift team consists of individuals performing each of the roles listed below:

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<sup>3</sup> Ibid

- 1.19.1 Power System Manager ("PSM"). The PSM has overall authority for real-time decisions necessary for the management of the National Electricity Transmission System ("NETS") and makes such decisions as a result of input from the roles detailed below.
- 1.19.2 Operational Strategy Manager ("OSM"). The OSM manages the strategy team within the Control Room. The strategy team consists of:
  - 1.19.2.1 National Scheduling Engineer;
  - 1.19.2.2 Assistant National Scheduling Engineer;
  - 1.19.2.3 Transmission Analysis Engineer Scotland;
  - 1.19.2.4 Transmission Analysis Engineer England & Wales;
  - 1.19.2.5 Control Technical Assistant; and
  - 1.19.2.6 Day Ahead Congestion Forecasting.
- 1.19.3 Operational Energy Manager ("OEM"). The OEM manages the energy team within the Control Room and sits in Control 2. The energy team consists of:
  - 1.19.3.1 National Balancing Engineer;
  - 1.19.3.2 Assistant National Balancing Engineer North;
  - 1.19.3.3 Assistant National Balancing Engineer South; and
  - 1.19.3.4 Additional Assistant National Balancing Engineer.
- 1.19.4 Transmission Security Manager ("TSM"). The TSM manages the transmission team within the Control Room. The transmission team consists of:
  - 1.19.4.1 Transmission Security Engineer North;
  - 1.19.4.2 Assistant Transmission Security Engineer North;
  - 1.19.4.3 Transmission Security Engineer South;
  - 1.19.4.4 Assistant Transmission Security Engineer South;
  - 1.19.4.5 Transmission Security Engineer Scotland North; and
  - 1.19.4.6 Transmission Security Engineer Scotland South.
- 1.20 During the course of the investigation, various other allegations have been reported in the press. In the interests of time and efficiency, whilst ESI and the Panel are aware of these

allegations, they have not been considered in detail as part of this investigation, as to do so would have been outside the scope of the ToR. However, where witnesses have raised wider concerns with the investigating team, details have been included in **Section 5: Conclusions and Recommendations**.

1.21 The remainder of this Report is structured as follows:

1.21.1 **Section 2** contains the Executive Summary.

1.21.2 **Section 3** sets out the Investigation Process.

1.21.3 **Section 4** sets out detailed findings against each item in the ToR, together with cross-cutting themes.

1.21.4 **Section 5** sets out Conclusions and Recommendations.

## 2. EXECUTIVE SUMMARY

- 2.1 ESI was instructed on 09 July 2026 to investigate four allegations arising from alleged whistleblower contact. The allegations are as set out at paragraphs 1.10.1 to 1.10.4 above, and, in short, relate to the deliberate alteration of operational records to avoid FOI scrutiny; the use of 'live documents' with no version history; the application of such practices during the frequency incident of 23 June 2026; and alleged interference by Corporate Affairs in operational decisions of the Control Room.
- 2.2 The investigation has involved interviews with 36 witnesses spanning multiple functions and levels of seniority within NESO, including operational staff, middle management, and senior leadership, both within and outside the Control Room environment. NESO is an organisation of 2,700 staff, of which 130 work in the Control Room. Whilst the investigation was open to contributions from across the organisation, this Review inevitably focussed on a limited number of staff and the events set out in the ToR. The cultural issues identified in this Report, whilst serious, reflect the experiences of those staff and we did not review nor was evidence provided of wider experiences of staff beyond the circumstances set out in the ToR. The investigation team has also reviewed over 300 documents including Control Room logs, system operating plans ("SOPs"), situation reports, ENCC status reports, system warnings data, internal communications and recorded telephone communications. A detailed index of documentation reviewed appears at **Appendix F**.
- 2.3 Our findings on each of the ToR 1 to 4 are as follows:
- 2.3.1 **ToR 1 (Alteration of records):** The weight of witness testimony does not support the allegation that operational records were deliberately altered, deleted or not kept, in order to circumvent FOI obligations. No witness reported receiving an instruction to delete, alter or suppress records, and nor did we locate any written evidence of inappropriate version changes being made. Whilst ESI identified reference to one change being made to operational documents (within a PSM Report) this was explained as being made as part of the operational process, and not due to any pressure or external influence. On a separate but related point, another witness indicated that a briefing written by the Corporate Affairs team relating to the events of 23 June 2026 was quickly amended to correct a technical error, which may have led to misinterpretation, but again, was explained as a change that was made for the sake of accuracy, not in an effort to misrepresent the state of affairs. ESI finds, therefore, that there is no evidence corroborating the allegations made regarding intentional alteration or suppression of key documents, insofar as these relate to the specific events in question on 23 June 2026.

- 2.3.2 **ToR 2 (Live documents):** 'Live documents' are a longstanding feature of Control Room operations pre-dating FOI obligations. The Control Room uses a mix of handwritten logs, Word-based handover documents, Excel-based management spreadsheets and system-generated outputs. Handwritten logs are signed, timestamped and retained, and system-generated SOPs are saved as individually numbered PDF snapshots, meaning that these records cannot be retrospectively altered. However, certain electronic documents, particularly Word-based handover documents and Excel-based reports stored on the local 'S Drive', lack robust version control, and successive saves overwrite the previous state without preserving version history. As noted above in ToR 1, it was explained that some documents are altered throughout the day in line with operational changes and fluctuations in the system state. However, there was no evidence to suggest that Senior NESO managers instructed operators to use live documents to avoid an audit trail or disclosure under FOI. Evidence did suggest, however, that version control practices require improvement.
- 2.3.3 **ToR 3 (Events of 23 June 2026):** Witness evidence as to the events of this day varied, depending on shift times and teams. The evening of 23 June 2026 saw system frequency fall to 49.67Hz, below operational limits, in the context of extreme heat, low wind generation, reduced plant availability and an unexpected reversal of the French interconnector ("IFA"). New interconnector trading limits introduced in May 2026, limiting trades to 1,500MW across all interconnectors and 300MW on any single interconnector, restricted the tools available to the Control Room in managing tight margins. The Control Room nevertheless managed to bring the incident under control through rapid dispatch of generation and battery resources, emergency instructions to interconnectors and coordination with neighbouring system operators. As found in line with ToR 1 and 2, ESI has found no evidence that any operational decisions made by the Control Room on 23 June 2026 were made for any reasons other than as a result of engineers' operational judgment, and based upon the developing situation at the time. There was one document which had been amended and one witness did question whether the full suite of escalation actions, including High Risk of Demand Reduction ("HRDR") and Demand Control Imminent ("DCI") warnings should have been taken at an earlier stage. However, these issues and whether or not those operational decisions were the correct ones to make at the time should be tested further in the Technical Review.
- 2.3.4 **ToR 4 (Corporate Affairs interference):** All witnesses denied that Corporate Affairs directly interfered in any operational decisions or activities taking place within the Control Room. One witness described an indirect influence pathway that theoretically could have taken place on 23 June, through mobile telephone calls between the PSMs and senior management, but this evidence was not corroborated. A review of recorded telephone communications from the week

commencing 22 June 2026 also confirmed that, in each instance, the decision to issue an EMN was ultimately taken on operational grounds, and there were no instructions (explicit or implicit) given not to issue an EMN. The recordings also confirmed that no Corporate Affairs personnel sought to influence, delay or prevent an operational decision. The evidence did reveal that a briefing relating to the events of 23 June 2026, which was written by the Corporate Affairs team, was quickly amended when a technical drafting error was identified (as mentioned at paragraph 2.3.1 above). However, that amendment was explained on its own terms as a correction to ensure technical accuracy, and not for any nefarious reasons. Whilst those in the Corporate Affairs team are generally knowledgeable, they are not specifically trained in Control Room operations and do not carry authorisations, which means that technical errors in drafting may occur unintentionally, and which require amendment. In ESI's view, however, this is part of routine drafting of communications on technical matters, and does not represent an attempt at interference..

- 2.4 In summary, **our investigation has not substantiated any of the allegations** set out by CCMP, and as explored under the ToR. However, whilst the specific allegations are not established, the investigation has identified cultural, governance and control issues that are significant findings in their own right and which should be addressed through the recommendations set out below.

## **Wider issues identified**

- 2.5 Beyond ToR 1 to 4, ESI was also asked to consider and recommend whether any further investigation is required, should any wider issues be identified which extend beyond the events of the week commencing 22 June 2026, such as any wider whistleblowing concerns within the Control Room.
- 2.6 It is our opinion, based on all of the witness evidence obtained and documentary evidence reviewed, that there are wider issues at play, which serve as important context given the allegations set out within ToR 1 to 4, and which ESI considers relevant for the purposes of this report. These can be summarised as follows:
- 2.6.1 There are high levels of stress and concern within the ENCC as a whole, as to the current state of the energy industry generally, as well as specifically in relation to the longer-term ability of the ENCC to keep the system balanced, given:
- 2.6.1.1 the increasing demands being placed on the electricity networks and *“the challenges of the net zero transition... noting that conventional generation had been easier to manage because of better system inertia, whereas increased reliance on renewables, which are less flexible, makes the job more difficult”*; and

- 2.6.1.2 the way in which the energy markets work, alongside the increasing demands (as explained above), meaning that it is increasingly challenging for the Control Room to deal with last-minute changes in trades which can take place, and the potential impact this can have on keeping the system balanced<sup>4</sup>.
- 2.6.2 There is a significant disconnect between the ENCC and the Executive Leadership Team, with multiple witnesses expressing the view that those in senior leadership and executive positions do not fully appreciate or understand either the way in which the Control Room works, or the reality of the pressures faced by those on the frontline who are responsible for “*keeping the lights on*”. This results in significant frustration in some quarters, when press reports are released which, they feel, understate or misrepresent the reality of the challenge they are facing. This applies to the events of 23 June: some witnesses expressed the view that the press release should not have stated that the system was “*not at risk*”, when the system was consistently in breach of operational limits for a number of hours, with operators working around the clock to regain balance. As noted above, whether or not the system was, or was not at risk is not for ESI to determine, and nor is it a matter for ESI to confirm whether or not the appropriate escalation protocols were followed in the circumstances. This is a matter that will be addressed in the Technical Review.
- 2.6.3 ESI has sought to test whether there was a discrepancy between NESO’s description of the state of the system to external parties during the week of 22 June 2026 (insofar as this has been possible), versus the Control Room’s internal description (derived from documentary and witness evidence). It is our view that no such discrepancy exists. External communications are important. PSMs are necessarily required to keep external stakeholders updated and informed as to the situation within the Control Room, particularly when an EMN may be issued. This includes speaking with the Corporate Affairs team to ensure that they are briefed to be able to handle media and stakeholder queries and communications once an EMN is issued. This allows the Control Room to get on with the job in hand. As noted above, and at paragraphs 2.3.1 to 2.3.4, ESI did not find any evidence to corroborate an intentional misrepresentation of the system state. Instead, there is a general feeling within the ENCC that wider NESO management (and in particular those who do not have a background in Control Room operation or who have never held any authorisations) do not appreciate and do not listen to the struggles currently being faced at an operational level. Witnesses felt that their concerns or complaints, whilst they felt able to raise them, went largely unheard, and that this was because of the

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It is beyond the scope of this Review, and ESI’s expertise, to comment on the industry approach to the Government’s commitments to achieving net zero, or the way in which energy trades are brokered.

need to keep external stakeholders (customers, Government and the regulators) happy. This has contributed to a culture of perceived non-response in which some individuals do not see outcomes when queries are raised and may now avoid raising concerns altogether, perceiving little point in doing so when nothing appears to change. This perception is itself a cultural and governance concern and helps explain why individuals felt the need to raise concerns externally.

- 2.7 Whilst we have concluded that the specific allegations are not supported by the weight of evidence, and there was no established interference in Control Room operational decision-making, nor any deliberate record-keeping practices intended to circumvent FOI obligations, the above factors have plainly led to a situation whereby an individual or individuals felt the need to raise their concerns externally. These wider concerns, whilst not establishing any of the four specific allegations, identify cultural and governance issues that should be addressed. It is important that NESO reflects upon the findings of this Report and its recommendations, and seeks to address the wider issues and views of Control Room staff, in order to strengthen relations and restore confidence within the team.
- 2.8 Seven recommendations are made at the conclusion of this Report for the NESO Board's consideration. They address:
- 2.8.1 Version control gaps;
  - 2.8.2 Standardisation of logging practices;
  - 2.8.3 Review of the Speak Up Policy;
  - 2.8.4 Establishment of a structured feedback loop where concerns are raised;
  - 2.8.5 Bridging the disconnect between the ENCC and the Executive Leadership Team;
  - 2.8.6 A protocol for Corporate Affairs involvement in operational communications; and
  - 2.8.7 The culture of reputational sensitivity and the potential impact on decisions.

## 3. THE INVESTIGATION PROCESS

- 3.1 The findings and conclusions of this Report have been arrived at having regard to the evidence placed before the investigation. We have considered the body of evidence collated as a whole, and based our conclusions on that body of evidence.
- 3.2 During our investigation, we have had access to two categories of evidence: documentary evidence and witness evidence.

### Documentary Evidence

- 3.3 In the first instance, requests were made for:
  - 3.3.1 The whistleblowing policy;
  - 3.3.2 Policies and procedures pertaining to the operational decisions and record keeping within the Control Room generally;
  - 3.3.3 Any guidance for the communications team in respect of actions and the extent to which they should get involved in operational matters;
  - 3.3.4 FOI policy;
  - 3.3.5 Silver Command logs for the week commencing 22 June 2026;
  - 3.3.6 Relevant job description for Control Room staff and Corporate Affairs to the extent that they will include details of what is within their remit to do/not do; and
  - 3.3.7 Any other documents the legal team believed to be relevant to the ToR.
- 3.4 This document request was initially shared with the NESO Legal Team, Director of System Operations, Executive Director of Corporate Affairs and Chief People Officer. It was subsequently decided that these documents, and any future requests, should be collated centrally by a Central Analyst and, in their absence, a Regulatory Strategy Manager. As the interviews developed, witnesses suggested additional documents for consideration therefore further requests were made as the investigation developed. A full list of all documents provided to the investigation can be found at **Appendix F**. All documents requested were provided.
- 3.5 Given the proportionate approach taken to obtaining relevant documentation, whilst we have received and reviewed a substantial volume of documentary evidence, we cannot guarantee that all potentially relevant documentary evidence has been collected and reviewed. However, having reviewed all witness evidence, cross referred that against the

documents received, we are confident that the risk of missing key documentation is minimal.

- 3.6 During the investigation we were informed that all desk landline telephones were recorded lines and that the PSM also has access to a mobile phone. As detailed further below, a small number of witnesses suggested that mobile phones were often used in the Control Room instead of desk phones. One witness questioned if this was done to circumvent the use of recorded desk phones. ESI investigated this point further, and was told that there are also logs of the PSM's mobile phone line. It was therefore decided that the logs of the recorded PSM mobile phone line would be requested and reviewed. However, as a result of the strong evidential position established through corroborated witness accounts and supporting documentary evidence in respect of the desk logs and handover documentation, a full review of all recorded desk (landline) phone calls was considered by ESI and the Panel to be unnecessary and disproportionate, as these would not have taken the inquiry any further.

### **Witness Evidence**

- 3.7 We spoke to 28 senior individuals within the Control Room and eight from outside the Control Room as part of the investigation. All interviews were conducted by senior ESI lawyers, without NESO attendees present, on a fully confidential basis, preserving the anonymity of all interviewees. Interviewees were offered the opportunity to be accompanied by a Trade Union representative or colleague.
- 3.8 Two updates were also sent to all NESO employees by the Chair of the Panel, Jayne Scott, where individuals with information relevant to the ToR were invited to contact ESI directly and anonymously through a dedicated confidential email address and telephone line. Three people contacted ESI as a result of these NESO-all e-mails. A further individual from outside NESO contacted ESI as the investigation was drawing to a close. This individual had already made contact with the Technical Review and it was felt their evidence was more relevant to that investigation.
- 3.9 It was agreed that all PSMs, OSMs, OEMs and TSMs who were on shift in the Control Room and those working Corporate Affairs during the week in question, would be specifically invited to speak to us, whilst an open invitation would also be sent more widely to all NESO staff to make contact with ESI, should they wish to speak with us. All Control Room staff were therefore given the opportunity to engage with this Review.
- 3.10 In addition, during the course of witness interviews, the names of other potentially relevant individuals were provided to us. Those individuals were invited to meet with us.
- 3.11 At various stages during the investigation, the Panel questioned ESI as to whether witness coverage was sufficiently comprehensive across each of the roles detailed above, without ESI disclosing the number of witnesses interviewed from each role. The Panel sought assurance that all senior roles within the Control Room were adequately represented; which

they were. Consideration was given to whether every member of Control Room staff should have been directly invited to interview. However, following the 36 interviews conducted, the consistent themes emerging from the witness evidence indicated that interviewing all Control Room staff would be unnecessary and all witnesses spoken to had actively engaged and spoken transparently. Upon ESI's advice that it was not necessary to widen the pool or conduct any further representative interviews, the Panel was satisfied that no further interviews were required<sup>5</sup>. This was felt to be the case particularly given that two NESO-all emails sent by the Chair of the Panel had provided an open invitation for individuals to contact the investigation, and only a small number had done so.

- 3.12 Given the premise of this Review, ESI committed to the Panel and to all witnesses that anonymity would be maintained throughout, which included an agreement not to confirm which individuals or roles agreed to speak with us. However, we are satisfied that we spoke with enough people from across the organisation, and obtained sufficient evidence relating to both the Control Room and Corporate Affairs.
- 3.13 Whilst the investigation was open to contributions from across the organisation, the feedback received and interviews conducted came predominantly from the system operations team and those working with the Control Room.<sup>6</sup> As a result, the cultural issues identified in this Report, whilst serious, have emanated primarily from this area of the organisation. NESO management and the Board should, however, reflect on whether these issues extend across the organisation more widely.
- 3.14 ESI would like to thank all of the witnesses for their time and cooperation in engaging with the investigation. It was felt that witnesses were open and helpful, although some did appear hesitant initially and expressed some anxiety about how information might be used and who would have access to the witness evidence. Each witness was assured that their identities would remain anonymous and such information has not even been shared with the Panel.

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<sup>5</sup> For context, 115 separate individuals were working in the Control Room during the week commencing 22 June 2026.

<sup>6</sup> This team comprises 130 individuals within an organisation of approximately 2,700 staff.

## 4. DETAILED FINDINGS

- 4.1 The detailed findings of our review are set out in this section underneath each of the ToR, as set out in paragraph 1.10 above. Where the investigation has identified wider cultural or governance themes that extend beyond the specific allegations to be addressed by the ToR, these are addressed in Section 5 below.

### 4.2 ToR 1: Alteration of records

**NESO has been deliberately altering operational records to avoid public scrutiny under Freedom of Information (FOI) law.**

#### *Evidence base*

##### **Documentation**

- 4.2.1 In reviewing this ToR, witnesses were asked to explain the operational and reporting documentation used within the Control Room, and to describe the process for logging and updating those records. Their evidence was compared against copies of various Control Room records for the week of 22 June 2026, and considered in the context of the applicable NESO business procedures (“**BPs**”). These include:
- 4.2.1.1 BP1700 – Operational Logging on the ENCC Transmission Desk
  - 4.2.1.2 BP160E – Energy Balancing Best Practice
  - 4.2.1.3 BP160S – Strategy Best Practice
  - 4.2.1.4 BP160T – Transmission Security Best Practice
- 4.2.2 For the purposes of this ToR, the key points to note from those BPs are as follows:
- 4.2.2.1 **BP1700** requires operational messages, instructions, system events and other significant operational matters to be recorded, together with Control Room audit box logs for every day of the relevant week. We were provided with evidence of audit box logs, SOPs, daily management reports, Control Room Status Reports and transmission logs, for the week of 22 June 2026, demonstrating that BP1700 was being complied with at the time.
  - 4.2.2.2 **BP106E** requires OEMs to complete a management report, stating any changes made since receiving the final SOP and producing a commentary for the shift, whilst the National Balancing Engineer

("NBE") is required to issue frequency control instructions (albeit this is not mandated to be in writing). Detailed expectations are also included for the management of shift handovers, with a checklist of issues and suggested format that should be covered in the handover between the OEMs and NBEs. BP106E also sets out logging practices that must be followed, requiring OEMs specifically to log *"information on changes to the constraint limits, including volume, duration, and BOA prices;"* and *"any information that, in the event of a future review, would explain the decisions made on the day"*. Similarly, NBEs and Assistant NBEs are required to log *"any out of merit actions taken & reasons why"* and *"all other discussions with fellow control engineers and external parties which experience would suggest have an operational implication"*. It summarises the importance of logging as follows:

*"Operational logging requires discipline and clear, concise recording of messages. With Electronic Despatch Logging, routine logging is easier, but it's still important to log key messages and decisions in the Communication/Decisions Log. This log helps transfer knowledge, record actions, and explain decisions, which is crucial for later shifts, reviews, and audits. Always include the time in your entries.*

*Logging shows how we handle issues professionally. Our logs should reflect our careful decision-making. Even when busy, note the time, contact name, and brief subject of messages on a pad, and complete the log entries when things calm down."*

4.2.2.3 We have seen copies of the OEM Communication/Decisions Log for the week of 22 June 2026, as well as the Zonal Balancing Logs, and we have not identified any evidence of alternations to records, notes indicating interference, or reference to any instructions regarding the decisions made across that week, including on 23 June 2026. These records appear consistent with what we were told by witnesses in relation to the events of that week/day.

4.2.2.4 **BP106S** includes considerable detail as to the different individual roles and responsibilities within the Control Room, with one of the overriding duties being to create the SOPs for the rest of the Control Room. It also includes similar provisions and expectations regarding handover documentation, telephone message logs and logging of actions (for example in relation to demand constraints and demand estimations) via the OSM diary – which specifically requires as follows:

*"The OSM Diary is a facility for the OSM to be able to check unusual occurrences or events that may have affected the demand profile. Any relevant information such as unusual weather patterns, abnormal TV pick-ups, bank holidays or school holidays should be recorded. The OSM diary should be checked when choosing a profile day to see if there was any significant event for the chosen day."*

4.2.2.5 Decisions or significant changes should also be captured in the OPRALOG system.

4.2.2.6 We have been provided with copies of the OSM Reports for the week of 22 June, however only the reports for 26 and 27 June appear to have been populated; the others remain blank indicating these were not filled out by the OSMs on shift on those days. We have not been able to establish why, but given the population of other documents, it is assumed this was due to OSMs being too busy managing the situation in hand.

4.2.2.7 **BP106T** includes specific duties for Transmission Security Engineers ("**TSE**") regarding switching logs, with log sheets filed at the end of shift and end of day, as these feed into a wider Transmission Despatch and Audit procedure undertaken by the TSM. A more detailed procedure exists under BP1105 with a formalised list of what should be detailed in the switching logs. BP160T also requires staff to log all operational conversations and system configuration requests (as per BP1700) stating that *"any message received that has operational implications, however small, must be logged. A very brief entry may be all that is needed"*. It goes on to state that:

*"The Transmission Security log is an important tool for logging your thoughts, discussions, switching plan and concerns. It records your intended actions. This is particularly important following an interruption."*

4.2.2.8 We have reviewed copies of the TSM Daily Reports, the Thermal Security Log and the Control Room Transmission Logs for the week commencing 22 June 2026. We did not observe any evidence of alterations, or anomalous notes within the documentation, and – to the extent that we are able to comment – the entries within the documents appeared to be consistent with witness testimony. Notably, the TSM's Daily Report for the overnight shift of 23/24 June 2026, reported the following:

*"Period 3C was very challenging. There was swing of 3GW on IFA which activated the SEIMPR23. EA action was taken on BRITNED and IFA and the frequency was running below 49.8 for over 20mins. The OEM had to violate multiple constraint just to manage the frequency."*

#### **Witness evidence**

4.2.3 Operational logging was described as one of the key tasks undertaken by the individual Control Room teams, and that there are procedures in place which state that those teams should log all their activities, including all interchanges of information, where decisions were made, and anything that was discussed with third party stakeholders. Manual, handwritten log sheets are kept by individual Control Room desks – for example, the energy team will routinely note down demand and cardinal points. As well as manual logs, there are digital records, such as the SOPs, and the systems will retain their own timestamped logs, which could then be tallied against manual records.

4.2.4 All Control Room witnesses were clear that they are required to log all decisions and the importance of logging and the handover between shifts was repeatedly emphasised. One witness confidently explained that logging was considered of such high importance in the Control Room, that if anyone had been asked to do something they disagreed with, then this in itself would be noted down – as operatives are fully aware that they could be called to justify their own actions at any time. No such comments were identified in the logs reviewed as part of the investigation.

*"If I was asked to do something that I didn't agree with, then it would be logged. And I have done in the past. There have been things that I have argued against. I have been sort of overruled by the management team<sup>7</sup>. They've said, you know, please get on and put that in the plan. And you end up with an A4 page on the log sheet".*

4.2.5 Another stated that they were *"genuinely puzzled"* by the allegation and confirmed they had never been told not to write anything down in over 30 years of service. This was supported by another who said he has never heard anyone say *"don't log that"* in 20 years. Multiple witnesses described a culture where the standing advice is to log everything with one commenting that it frustrated them that there was any suggestion *"that we are trying to hide information because that is quite the opposite"*.

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<sup>7</sup>

This reference is to management within the Control Room.

- 4.2.6 We were also told that logging was considered an important practice to be able to carry out post-event analysis and produce operational learning notes for the engineers, and to inform future operational practice:

*"The main importance of logging is when there is any system disturbance, you need to have a means and ways of, you know, doing a post-event analysis."*

- 4.2.7 However, 12 witnesses working in the Control Room acknowledged either explicitly or implicitly that *"every decision is not logged"* and that *"We're not very good at logging"*. Different reasons were given for this: a senior person in the Control Room described gaps as *"lethargy, bad practice"* (as opposed to any attempt at concealment), whilst another explained that the energy desk is so busy throughout a shift – particularly when margins are tight – that, whilst there is a plan that they are all working to, often *"there is so much stuff that we're juggling at every hour, every day, every minute of every day [that] I don't believe it would be possible to record all of that information... not because we don't want to, that's because the moment's gone because you've moved on to another thing that was also really important"*. None of the 12 attributed incomplete logging to deliberate concealment; rather they described it as an inherent challenge of operating in a high-pressure environment. This is not a matter for ESI to explore further as part of this report, but is reflected in our Recommendations to the NESO Board.

- 4.2.8 One witness explained that whilst logs should be kept of telephone calls and recorded via the desk phones, they thought that it was possible that mobile communications between the Control Room and other departments outside of the Control Room may not have been documented – including on 23 June 2026 – although we have not been able to corroborate this via any other witness testimony or review of telephone logs.

- 4.2.9 We were also told by a witness, who worked within the Control Room, that a practice had evolved whereby documents to be sent outside of the Control Room would be marked 'confidential draft', if they contained any sensitive or problematic information, and instead operatives were told to raise issues by mobile telephone first, in order to avoid disclosure under FOI requests. It was explained that:

*"...as [a result of a leak of internal e-mails in February 2025], what then happened, not as a structured rollout training, it became a common practise if you're working with senior people in the business, that if there's a very difficult thing, like if you think there's a really big problem, it's better to say it verbally first, so to speak to someone in person...[and] we implemented a working practise. If you're going to say something difficult after the initial discussion, like you know you have to do a report and show some proof of stuff, you have to*

*use a live document because the draft of a live document is not accessible to Freedom of Information, then, if a request comes in for Freedom of Information, you can turn that into a final version, but clearly you can edit that before you create a final version, if that even happens.”*

- 4.2.10 It should be noted that this account was given by the witness more generally in relation to the flow of information out of the Control Room, and the preparation of Control Room reports – rather than specifically in the context of record keeping and alteration of documents pertaining to the events of 23 June 2026. It was described in the context of heightened nervousness within NESO more generally about confidential material being released outside of the organisation, following a previous leak, rather than specifically in relation to Control Room documentation and the week in question. No other witnesses expressed this view.
- 4.2.11 As there was no other evidence suggesting that any such directions were given, or approaches taken by the Control Room in relation to any of the operational logs or reports pertaining to 23 June 2026, any further exploration of this particular suggestion falls outside the scope of this Report, but may be something the NESO Board wishes to explore further.
- 4.2.12 Another witness, however, offered an explanation of changes they had made to a report relating to the events of 23 June 2026 – with such changes being made in order to correct a technical description of what took place – as they believed this could have led to misinterpretation. As this particular issue related to material being prepared by an individual within Corporate Affairs, this evidence is dealt with as part of ToR 4 rather than ToR 1.

## **Findings**

- 4.2.13 From the documentation reviewed, we have not seen any evidence of alterations to versions, deletions, or changes to documents that give rise to any concerns or questions in relation to decision making, or which suggest attempts to misrepresent the situation in the Control Room.
- 4.2.14 In our view, the documentation reviewed supports all relevant witness testimony as to the events during the week of 22 June, and for 23 June specifically (as set out in ToR 3). Of the witnesses able to comment on Control Room practices and operational records maintained relating to the week of 22 June 2026, **all** denied receiving any formal instruction to alter, delete or suppress operational records. The mobile phone recordings from the Control Room during the week in question, also support this finding.

- 4.2.15 We spoke to TSMs, OEMs, OSMs and PSMs, and invited all Control Room operators on shift that week to speak with us, and in all cases we were told that no one had ever been told not to take notes, or not to log decisions. A number of witnesses said that they “*did not recognise*” what had been alleged in this regard, or could not countenance how this might happen, given that a lot of operational documentation is automatically and contemporaneously recorded within the Control Room.
- 4.2.16 One witness stated that, “*It’s difficult to sweep any information under the carpet in the control room setup [due to] the way the system itself operates*”. Another witness said that in all their years working in the Control Room, never “*would that ever be a discussion that don’t write this because it will cause whatever*”.
- 4.2.17 As noted above, the witness who described an evolved practice around keeping confidential documents in a ‘draft’ state, with a view to ensuring that these remained ringfenced from disclosure, could not provide any confirmation that this occurred during the week in question, or specifically on 23 June, and despite inviting other witnesses to come forward, no further evidence was volunteered which corroborated this account.
- 4.2.18 In respect of ToR 1, therefore, this Review finds that there is no evidence that operational records were deliberately altered, deleted or not kept, directly in order to circumvent FOI obligations. No witness reported receiving an instruction to delete, alter or suppress records, and nor did we locate any written evidence of inappropriate version changes being made. Equally, we saw no evidence of reports or documents being kept or submitted in a “draft” state, and no evidence of overt intention to avoid potential disclosure under FOIA.

#### 4.3 **ToR 2: Live documents**

**During periods of system stress, Senior NESO managers have instructed operators in the Control Room to keep ‘live documents’ with no version history to ensure there is no audit trail or records of how key operational decisions are made and to ensure records are not preserved for the purposes of FOI.**

##### ***Evidence Base***

- 4.3.1 As part of this Review, ESI received in excess of 300 documents, comprising of operational documents, policies, Control Room and telephone logs, handover documents and Control Room manager reports. Witnesses were asked to explain what types of live documents were produced by or held within the Control Room, compared to documents which carried version histories. They were also asked

about the process for saving or downloading versions, or taking “snapshots” of live systems, if required.

4.3.2 We were told that the core suite of live documents used by the Control Room broadly fell into four categories:

4.3.2.1 Handwritten paper logs maintained at individual desks;

4.3.2.2 Word-based handover and narrative documents updated during shifts;

4.3.2.3 Excel-based management and monitoring spreadsheets, including the OEM report and the EMN spreadsheet; and

4.3.2.4 System-generated outputs from the scheduling tool known as SPICE, which produces system operating plans saved as PDF snapshots at defined intervals.

4.3.3 The handwritten logs were described as the primary, real-time record of operational decisions and communications outside of the Control Room. Witnesses confirmed that these are signed, timestamped, and retained in storage, and that by their nature they cannot be retrospectively altered. As one witness put it:

*"a log is the contemporary record of what happened then. So a log by its nature wouldn't have version one or two because you just log as you're going on".*

4.3.4 Alongside the paper logs, each operational desk maintains some form of electronic document. The most commonly referenced was the shift handover document — a Word file updated throughout a shift and intended to brief the incoming team on what had occurred during the incumbent shift, and what remained outstanding. Such documents were described as *"always live"* until saved down at the end of a defined period, at which point they became a static record. The evidence was inconsistent in respect of whether changes in these live documents are trackable and retained, as detailed further below.

4.3.5 The OEM report, an Excel spreadsheet used to track demand figures, margin positions, and shift narratives, is intended to serve a similar function on the energy management desk. The OSM handover document is saved under a new filename at the start of each shift, with the previous version retained, whilst the handover on the transmission desk comprises a single document that is saved daily and divided into three shift segments, with each shift completing its section before the night shift saves the document and starts a new one. Given the nature of Excel spreadsheets and the description of the OSM handover document, it is unlikely that changes in these documents are trackable and retained.

- 4.3.6 The SPICE-generated SOPs followed a more structured save regime. These are produced at set points during the day, saved as individually numbered versions, and are then turned into PDF documents that cannot be overwritten. One witness did explain, however, that between formal saves the data could be refreshed, and any unsaved interim status would be lost. Another explained it succinctly, as follows:

*"So in terms of version control of operational documents, when it comes to handover and management reporting, there's only going to be one, which is the one that's saved down at the time you need to issue that document. But in terms of the more formal documents, like the SOP, or the transmission state certificate... those, you know, will have version control and numbers on them".*

- 4.3.7 A further source of record-keeping was the suite of internal advice documents known as the "CRAIG" (Control Room Advice and Information Guide), a weekly document providing short-term policy and guidance to the Control Room, supplemented by daily updates and a standing advice section for particularly important matters. The CRAIG is, by its nature, regularly edited and updated, but does not give granular-level instructions or directions to the Control Room and nor does it record real-time Control Room activity, meaning that it was not considered a relevant document for the purposes of our review.
- 4.3.8 Another document which is not live, but which is relevant to our review and relies upon live data to be collated and fed into it, is the EMN spreadsheet, which is managed by the OSM. The EMN spreadsheet works by relevant SOPs being uploaded, which then automatically populate the EMN spreadsheet with the required data – i.e. data on demand, constraints, reserves, and cardinal points, for example.
- 4.3.9 There is a tab within the EMN spreadsheet titled "Standing Advice", which appears to set out data taken from the CRAIG for reserve requirements and trigger levels. The Standing Advice sets out the "contingency requirement", the "EMN trigger level" and the "HRDR trigger level" according to different times of day and different days of the week. From the copy provided to us, it appears that, whilst the contingency requirements changed according to different times of the day, the EMN and HRDR trigger levels did not change and were set at a fixed value of 500MW and 1440MW respectively.
- 4.3.10 The first EMN spreadsheet provided for the week commencing Monday 22 June, is dated 24 June. Two EMN spreadsheets were provided for this day, the first entry being taken from the SOP at 18:29 on 23 June – i.e. as the peak began to hit and the first EMN was issued – through to the last entry which was taken from the SOP at 11:47 on 24 June. A third EMN spreadsheet was provided for

the period overnight on Thursday, 25 June into Friday, 26 June when a further EMN was issued. These spreadsheets showed that:

- 4.3.10.1 for the overnight period on 23 June 2026, EMNs remained “under review”, with no HRDRs considered as required, from 18:29 on Tuesday, 23 June through until 07:22 on the Wednesday, 24 June; and
  - 4.3.10.2 EMNs were then under review again from 22:40 on Thursday, 25 June through to 07:21 on Friday, 26 June – with an HRDR considered at 03:39 on the Friday morning.
- 4.3.11 The review of these spreadsheets, and the accompanying margin briefs which were sent to the market, appear consistent in terms of the assessments being made as to the stability of the system, in the period overnight from 23 June into 24 June 2026, and 25 June into 26 June, at the time the EMNs were issued. The position also appears consistent with the system security logs, which we have reviewed. Whilst there were no voltage or stability logs produced for the week of 22 June 2026, the thermal log was populated by the night shift on 23 June 2026 by reviewing the online transmission analysis logs against the documented actions. The event on 23 June 2026 was recorded as amber against the above criteria. We are therefore unable to find any suggestion, on the face of the documents, that these documents had been altered or in any way misrepresented the “live” position, as it was happening.
- 4.3.12 One witness did explain that the EMN spreadsheet was not the most user-friendly in terms of functionality and that this could put the OSM off updating it as regularly as they otherwise would, and therefore that it is possible that OSMs would update it only once or twice during a shift, and instead keep separate notes, especially if operations are tight and the Control Room is busy. Again, though, there is no evidence to suggest any wrongdoing or failure to record data with any malintent.
- 4.3.13 In terms of editability, version control and auditability, witnesses consistently explained that the generation of live documents was an inherent part of normal Control Room practice – as can be seen from the details outlined above.
- 4.3.14 A senior operational manager said they had worked with live documents since at least 2005. Paper logs are handwritten, signed and retained for seven years, while SharePoint and OneDrive retain version history for some documents. However, one witness explained that the report produced by OEMs/TSMs and sent to the PSM could in theory be edited without a preserved version history – although we were also told that when the PSMs do their status reports, they *“tend to just lift exactly what it says in the OEM report”*.

4.3.15 As regards the PSM reports, again, these appear consistent with the witness accounts and with the live records we have reviewed.

4.3.16 ESI did identify a change made to one document, whereby we noted that one reference in the afternoon shift entry for 23 June 2026 of the PSM report, stated as follows (with ESI querying the words highlighted in bold text):

*"13. Weds Margins tight.*

- *ITLs set at zero from 17:00hrs.*
- ***500MW Hot Weather Reserve modelled in SOP but removed in EMN spreadsheet. Also removed 100MW PAS reserve as EMN spreadsheet looked was showing HRDR with this in.***
- *-1872MW, 1372 into EMN trigger.*
- *Requested more IC trades - meeting at 20:30hrs. Need more time to study - arranged a new email at 03:00hrs and a meeting at 04:00hrs.*
- *HEYM-27 due to desynch at 10:01hrs.*
- *Moyle - max 100MW to GB*  
*Margin Brief and EMN issued at 22:00hrs - Media Team, Craig, Ofgem and DESNZ informed."*

4.3.17 ESI queried whether this wording in the PSM report represented an alteration which sought to downplay or mislead the reality of the security of the system – i.e. whether this entry in the report is saying that the reference to 100MW PAS reserve was removed from the spreadsheet, because keeping that reference in would mean a HRDR should be issued (and because of the consequences of issuing an HRDR, is something that was being avoided).

4.3.18 It was confirmed, however, that the removal of reserve requirements in the EMN spreadsheet would have happened when the SOP from the scheduling process was updated. We were told:

*"The EMN spreadsheet has several functions and is only produced when margins are tight. It is a post scheduling tool and is used to:*

- *Clearly illustrate the margin position*
- *Monitor changes in margin position throughout the day*
- *Identify what these changes are.*
- *Produce Margin Brief reports. These are for internal use but also sent to Ofgem and DESNZ so they are kept informed of developments."*

4.3.19 It was also explained that there is only one version of the EMN spreadsheet for the tight margin period, with any updated assessments being included within

this same, single version. Following each margin assessment and SOP input into the EMN spreadsheet, no changes are then made to this retrospectively. The spreadsheet is updated with new information when the next margin assessment is done, but any input already made is not changed.

- 4.3.20 As regards the reference to the “500MW Hot Weather Reserve”, we were told that this was based on the advice given in the CRAIG, and was to be added at the discretion of the OSM based on forecast system conditions. It was further explained by one of the Control Room witnesses that:

*“The additional reserve had been added as part of the regular scheduling process but was removed in the EMN spreadsheet as it was deemed not required. The need for additional reserve for hot weather was debatable, and an engineering judgement would have been used to remove it from the margin calculations.”*

- 4.3.21 Further, the “100MW PAS reserve” related to a temporary additional reserve requirement of 800MW to support the transition between two reserve products, and it was anticipated that the amount of reserve required would reduce. Again, decisions about these reserves would be made based on the OSM’s engineering assessment and experience. We were told that, as with the hot weather reserve, the decision to remove the 100MW PAS reserve was based on engineering judgement that this reserve was not required, and this was why it was removed from the EMN spreadsheet. It was explained that whilst this reserve requirement figure would normally be adjusted as part of the normal scheduling process “for ease of application, [this] was done in the EMN spreadsheet instead”.

- 4.3.22 ESI therefore understands that, whilst on the face of it, the above wording in the PSM report may suggest (to the lay reader) that entries were being removed to downplay the situation, the actual position is that this change was made for good reason and in accordance with accepted practice. Whether or not, operationally, the above explanation is correct, or whether other the OSM or PSM should have taken different steps, are questions that fall within the remit of the Technical Review, however.

- 4.3.23 ESI nevertheless challenged the point around the EMN spreadsheets and version control, and we were told:

*“I don't understand this allegation because all my experience has been that... all the versions of the EMN spreadsheets are there”.*

- 4.3.24 There clearly are some differences in version control capability depending on the platform on which documents are stored, and depending on the nature and purpose of the document in hand.

- 4.3.25 For example, where documents were saved on SharePoint or OneDrive, witnesses generally understood that version history was automatically maintained. One witness explained that *"the OEM report is on SharePoint and you can see version control on SharePoint"* and confirmed from personal experience that prior versions and original text were recoverable. Another witness similarly believed that the OneDrive environment retained version history in the background, whilst another expressed the view that Microsoft 365's cloud storage provided inherent version control, stating *"you can roll back to any version of that document at any point in time"*.
- 4.3.26 By contrast, where documents were stored on a local server — referred to by witnesses as the "S Drive" — no equivalent version history existed. We were told that management reports were held on the S Drive rather than on SharePoint, and acknowledged that *"if we had it on SharePoint, you would have that version history"*. As the S Drive does not support auto-save or automatic version tracking, successive saves overwrite the previous state of the document. BP0712, Record Storage, suggests that records should not be stored on Shared Drives, or other locations that would be affected by employee joiners, movers or leavers. However, it should be noted that this BP is not specific to the Control Room.
- 4.3.27 A number of witnesses acknowledged, to varying degrees, that the Word-based handover documents and Excel-based reports were susceptible to retrospective alteration. One witness conceded that the Word documents on the shared drive *"could be changed"* and that *"the only record of that would be whatever Microsoft did in saying when it was last edited,"* describing the security of those documents as not *"particularly great"*. Another similarly accepted that someone could, in theory, go back and alter a predecessor's handover, but stated this was not done in practice.
- 4.3.28 We were also told that the OEM management spreadsheet remained open on the OEM account throughout the operational day and therefore, in theory, a subsequent shift could overwrite what a prior shift had entered, although this was not common practice, and, again ESI saw no evidence of this taking place.
- 4.3.29 One significant concern was raised by a witness, who described a systemic audit trail issue with the OEM report, which is sent to the PSM to include in the PSM's report. They explained that the PSM could – if they so wished – edit the reports submitted by individual shift engineers, and that *"the previous version of that is not saved"* meaning *"you don't have an audit trail of what the person on shift wrote and what subsequent people wrote and what then the current version is"*. The witness went on to note that this editing practice likely originated as a means of correcting grammatical and spelling errors to produce a more professional final version, but cautioned that *"the problem is when you have a very serious*

*day like this, things can then be changed"*, although the witness could not say that the report for 23 June was in fact changed. They also described a broader working practice of sharing live document links for collaborative editing before producing a final version, which they believe was linked to concerns about FOI discoverability – although, again, this was not directly linked to the events of 23 June.

- 4.3.30 As indicated above in relation to ToR 1, ESI has been unable to corroborate these suggestions based on the documentation and other witness evidence obtained as part of this Review.

## **Findings**

- 4.3.31 NESO has multiple overlapping mechanisms for recording operational decisions, including handwritten logs, system-generated records, management reports and recorded calls. These include a mix of handwritten, Word-based, Excel-based, and system-generated documents — each with different version control characteristics appropriate to its function. Live documents, with a version history, are a longstanding feature of Control Room operations and pre-date FOI obligations.

- 4.3.32 While the majority of witnesses did not recognise the allegation of live documents with no version history as reflecting their experience, the evidence of a handful of witnesses identified an arguable gap in the audit trail for certain operational reports, which allows the potential for individuals to manually edit entries without a record of the original version being preserved. That said, the overwhelming majority of witnesses expressed confusion or scepticism about the allegation that live documents with no version history were used in the Control Room, and a significant number stated plainly that they did not understand what the allegation meant *"that doesn't make any sense to me at all."*

*"I wonder whether a well-intentioned remark had been slightly garbled by whichever way it was communicated."*

*"It didn't, the allegation didn't even make sense for those, for those documents to be honest."*

- 4.3.33 Several witnesses sought to rationalise the allegation by reference to the nature of Control Room documentation – i.e. that handwritten logs inherently lack version history but are not deficient for that reason. Conceptually, operational documents are by design live and singular — as one witness said, *"there's only going to be one, which is the one that's saved down at the time you need to issue that document"* — while formal documents such as SOPs and transmission certificates do appear to carry proper version control.

- 4.3.34 In conclusion, in relation to ToR 2, this Review finds that there is no evidence that Senior NESO managers instructed operators in the Control Room to keep 'live documents' with no version history to ensure there is no audit trail or records of how key operational decisions are made, nor as means of avoiding the preservation of records FOI purposes.

#### 4.4 **ToR 3: Events of 23 June 2026**

**The aforementioned approach was in effect during an incident on Tuesday 23<sup>rd</sup> June 2026 where system frequency became unstable, and fell below normal operating frequency limits set out in the Security and Quality Supply Standard (SQSS).**

##### **Evidence Base**

- 4.4.1 We have established above, in relation to ToR 1 and 2, that there is no evidence of alteration of documents (whether live or not), or of any instructions being given not to keep versions, or mark documents as draft, in order to avoid discovery under FOI. To this extent, for the purposes of ToR 3, this Review confirms that there is no evidence that the aforementioned approach was in effect during the incident on 23 June 2026 – and this does not require further investigation for the purposes of satisfying ToR 3. To go further, and investigate whether or not the system was or was not secure, or whether the correct escalations were followed, are matters which are outside the scope of this Review and will be separately addressed as part of the Technical Review.

- 4.4.2 However, the ToR also included the following wider direction for this Review:

*"Should wider issues be identified during the course of the investigation, which extend beyond the events of the week commencing 22 June 2026 (such as any wider whistleblowing concerns within the Control Room), then ESI will consider and recommend whether further investigation is required in respect of those issues, as part of this investigation or separately. Where relevant, ESI will include information in respect of those concerns within the report, maintaining the anonymity of the individual raising the concerns."*

- 4.4.3 In respect of ToR 3, we have therefore considered that it is also relevant to look at the overarching context of how the Control Room was operating that week, given the whistleblowing concerns more generally – which we discuss below – rather than to consider the appropriateness of steps taken by the Control Room. As noted throughout this report, it is not within the scope of this Review (and nor would it be appropriate for ESI) to opine on whether or not the system was or was not secure on 23 June (or at any other time), and to comment upon

whether correct decisions were or were not made, from a technical or operational point of view. Such determinations remain a matter for the separate Technical Review. ESI has not, therefore, undertaken a forensic examination of all technical records, timings, and decisions, as this will be carried out as part of the Technical Review. ESI has instead focussed on capturing the views of NESO staff and providing an objective analysis of how such evidence compares to the position as stated on the face of the relevant documentation reviewed.

4.4.4 Therefore, this aspect of our investigation focussed on whether or not there were other factors, influences or issues which could have impacted the decisions made, or whether there is any evidence that raises questions as to the practices being adopted more generally by the Control Room in relation to the events on 23 June 2026. ESI has considered it relevant to include these points, for the purposes of ToR 3, due to the weight of witness evidence received in relation to these issues.

4.4.5 In order to assist in this assessment, we have reviewed the evidence chronologically across the week commencing 22 June 2026.

#### **Chronology of events**

4.4.6 We were told that on the Monday (22 June 2026), there were no particular issues of note in the Control Room during the day, and that *"all the plant was coming on itself"* and that the system was meeting demand, with no anticipated issues for the following day. An EMN was therefore not under consideration on Monday 22 June.

4.4.7 However, several witnesses described how on the Tuesday evening the Control Room had to react to a sudden swing in IFA, which *"turned and fully changed direction with one hour's notice"* – meaning that IFA went from importing fully into Great Britain, to exporting towards France. Most of this change happened in the final hour before real time, leaving the Control Room without enough reserve for the evening peak – because the reserves and trades planned on the Monday and through the Tuesday day were no longer available when needed in the evening.

4.4.8 This meant the frequency dropped below operational limits for a sustained period, and a Frequency Event Report ("**FER**") was prepared by the OEM at 18:55 which stated as follows:

*"On the evening of 23rd June 2026, the Great Britain (GB) Electricity System experienced significantly reduced operational margins during the peak period. The event commenced at 18:55, with system frequency dropping from its nominal value of 50.00Hz to a starting frequency of 49.85Hz. The maximum*

*frequency deviation recorded was 49.67Hz, while total system demand reached 30,400MW”.*

- 4.4.9 The log stated that the following contributing factors led to the shortfall:
- *“High system demand during the evening peak;*
  - *Low wind generation;*
  - *Changes in interconnector flows;*
  - *Non-delivery of requested interconnector trades (up to 1,500MW between 17:00 and 21:00)”.*
- 4.4.10 These factors led to a decline in system frequency, which fell below operational limits by around 19:00, reaching 49.67Hz. At approximately 19:10 the PSM issued an Emergency Instruction (“**EI**”) to the BritNed interconnector to reduce its export.
- 4.4.11 NESO’s systems warnings log confirms that a request for Emergency Assistance (“**EA**”) had been agreed on a GB connected interconnector, and that *“GB net flow will increase by 500 MW between 20:00 23/06/2026 to 21:00 23/06/2026”* – i.e. NESO had committed to providing 500MW to France between those hours. However, NESO withdrew this assistance due to the tightening margins, and requested EA of 500MW in return. By approximately 21:30, France withdrew its EA, and the EI to BritNed was cancelled.
- 4.4.12 At 22:05, the PSM issued an EMN to the market via NESO’s system warnings log, which stated as follows:
- “An ELECTRICITY MARGIN NOTICE has been issued by the National Energy System Operator to encourage market actions to increase System Margins... from 19:00 hrs to 22:00 hrs on Wednesday 24/06/2026... There is a reduced system margin. System margin shortfall 1450 MW. The current contingency requirement is 670 MW. 1250 MW of generation is excluded from the available system margin due to system constraints. Maximum Generation Service may be instructed. Trading Points, Control Points and Externally interconnected System Operators are requested to notify NESO of any additional MW capacity. Suppliers please advise NESO of any additional Demand Control available. The situation will be reviewed again by NESO at 13:30 hours and an update issued.”*
- 4.4.13 The log also confirmed that the shortfall had led to five breaches of system constraints, and that *“These breaches occurred with no available pre- or post-action mitigation options”.*

- 4.4.14 A constraint is a deliberate, pre-planned cap on how much electricity can be pushed through a particular part of the network, set in advance to keep things safe, as compared with a failure, which is something unexpectedly going wrong with a piece of equipment, like a power line tripping without warning. Operational limits are the safety boundaries (such as maximum power flows or acceptable voltage and frequency ranges) that the system must stay within during normal running, and a breach is what happens when one of those boundaries is crossed, whether by accident or as a conscious trade-off to prevent something worse.
- 4.4.15 Despite this, the Control Room managed to bring the frequency back into operational limits overnight, into the morning of 24 June, whereupon the PSM reported at 08:10 that (whilst the EMN was still in force):
- "As the System Operator, National Energy System Operator are responsible for balancing the electricity system in the final hours before real-time. We have a number of routine tools we can use to help us do this, this toolkit includes ELECTRICITY MARGIN NOTICES. An ELECTRICITY MARGIN NOTICE is used to send a signal to the electricity market. It highlights that, in the short-term, we would like a greater safety cushion (margin) between power demand and available supply. It does not signal that blackouts are imminent or that there is not enough generation to meet current demand."*
- 4.4.16 The FER explained that the Control Room managed to bring the incident under control through *"rapid dispatch of generation and battery resources, emergency instructions to interconnectors, and coordination with neighbouring system operators"*.
- 4.4.17 We have compared the position as set out in the EMN system log and FER with the various reports produced by the Control Room/PSM, to consider whether there is any discrepancy in what was recorded – noting that ESI can only comment on what appears on the face of documents presented to us, and whether there are any obvious discrepancies or inconsistencies.
- 4.4.18 We noted that the PSM Handover Log for the week commencing Monday, 22 June 2026 noted during the Monday morning shift that the Met Office had issued Red weather warnings for extreme heat; that a *"watching brief"* would be adopted and extra reserve scheduled, as *"margins could be tight"*. By the Monday evening, margins were an issue, and the PSM reported a *"standing reserve shortfall"*, and so the OSM was setting up a margin brief, although, following work by the transmission desk, this was *"reviewed and limit reassessed to 5500MW [which] has ensured no margin brief [but there were] still ~1500MW of constraints"*.

4.4.19 Later into the Monday evening, the night shift noted:

*"ENCC Status Report Weather RAG should reflect Met Office warnings. We should not be setting it green with RED Met Office Warnings in place. Also, reminder to send email to DESNZ and Ofgem when any warning isn't Green."*

4.4.20 It is beyond the scope of this Review to interrogate any detailed correspondence between NESO and DESNZ/ Ofgem however, from the documentation reviewed by ESI and as noted at paragraph 4.3.11 above, the rating had previously been set at Amber on 23 June, and reduced down to Green on 24 June 2026, which would seem to be in keeping with the chronological course of events as set out above. This also appears consistent with the ENCC Reports for 23 and 24 June. Having also reviewed the Margin Briefs that were sent out to stakeholders, ESI noted that six such briefs were produced – three for 24 June and three for 26 June. These margin briefs also appear in keeping with the position as set out in the EMN spreadsheets (as discussed at paragraph 4.3.10 above). On that basis, there is nothing obvious to ESI, based upon the documentation and call data disclosed to date, that suggests the incident was being portrayed differently or misrepresented in any of the records or external documentation we have seen.

4.4.21 Moving to 24 June, we noted that when the incoming engineers on the morning of 24 June checked the Frequency and Time Error ("FATE") tracking software, they *"struggled to follow what [they] were seeing"* because the historical FATE data showed that the frequency had been in breach of operational limits for a sustained period. It was explained:

*"... to see it sit outside of operational for a sustained period of time, that is very unusual. Usually it would be back within 15 minutes, if not quicker, 15 minutes being the timing on our slow reserve."*

4.4.22 As an EMN had been issued the evening before (Tuesday, 23 June, for Wednesday, 24 June), this meant that the OSM was responsible for running the EMN spreadsheet throughout the shift, working together with the OEM and TSM – and reporting up to the PSM – as to the status of the system.

4.4.23 We noted in our document review that the OEM saved down regular SOPs so that these were available to the OSM to update the EMN spreadsheet, and worked closely with the rest of the energy team to ensure that the plants were running within limits and frequency was maintained within operational limits – which it did, for the remainder of that day (24 June).

4.4.24 Witness testimony also supported the chronology of events, with some notable additional comments made to ESI as follows:

- 4.4.24.1 One witness, who worked in the Control Room but was not on shift on the day, when hearing of the situation, felt strongly that warnings and demand control notices should have been issued on the Monday (22 June), as the Control Room knew margins were inadequate. This witness questioned whether such warnings were not issued by the Control Room due to discussions with senior management outside of the Control Room and Corporate Affairs, although the witness had no direct evidence to confirm this was the case. The witness explained that the energy desk knew that it could not cover the largest loss, and that this is fundamental to the decision that should be taken:

*"you cannot cover your first fault. You cannot. That's an absolute crystal clear black and white thing. We went well beyond that. We couldn't even meet 50. That means all the warnings should now have gone out. All 3, EMN, high risk of demand control, and demand control imminent".*

However, the alleged decision not to issue such warnings was, the witness believed, because of the "optics" and because the Control Room was "already in the mess".

- 4.4.24.2 ESI explored this against the evidence and via questioning of other witnesses. Whilst another witness suggested they may also have considered issuing a HRDR if they had been the PSM on duty that evening, others disagreed, saying that whilst margins were tight "they were always able to cover their largest loss", and that the EMNs issued "weren't anywhere close to HRDRs".

- 4.4.24.3 The point around "largest loss" was explained as being fundamental because, at this point, the Control Room does not know what the impact of just one fault would be on the stability of the system as a whole.

- 4.4.24.4 Insofar as the suggestion made by the above witness that the decision not to issue warnings was as a result of calls made between the Control Room and senior management or Corporate Affairs, ESI put this question directly to all witnesses who worked in the Control Room that week, and specifically all PSMs who were on shift that week, and who were responsible for liaising with Corporate Affairs and external stakeholders. All such witnesses denied that there was any such direction, influence or interference exerted upon the Control Room – whether by NESO senior management or Corporate Affairs – during the events of 23 June

2026, or indeed at any point during the week of 22 June 2026. This is, however, different from a feeling of indirect pressure – which we have found is a wider issue within the Control Room, and is discussed in more detail below.

- 4.4.25 A review of recorded telephone communications from the week commencing 22 June 2026 confirmed that, in each instance, the decision to issue an EMN was ultimately taken on operational grounds, and no recording contains an explicit instruction not to issue an EMN. The recordings do show deliberation around timing and whether issuance could be deferred, with one PSM noting *"I can't issue a margin brief without issuing an EMN"* and a senior colleague acknowledging that not issuing would *"raise more questions as to why we didn't."* In one exchange, a colleague told the PSM: *"don't feel under pressure from them"* – a reference to external stakeholders pressing for information in respect of when an EMN would be issued as they had been informed one was likely to be issued – and later counselled, *"don't let DESNZ pressure you, mate."* They also show one speaker confirming that the system had been *"already EMN territory"* for two days, prompting the response, *"that's not been escalated up then... we should've been on this yesterday morning."*
- 4.4.26 In our view, taken as a whole, the evidence shows engineers debating the operational steps to take, in the moment, based on their judgment of the evolving situation. They do not show engineers holding back on decisions or avoiding taking steps as a result of external influence or pressure. These recordings do not, therefore, alter the principal findings set out above, but they do align with some of the concerns identified at paragraphs 5.13 to 5.18 below, regarding feelings of indirect pressure, cultural hesitation around EMN issuance and the timing of operational decisions.
- 4.4.27 The majority of the witness evidence obtained was that EMNs are issued based on operational necessity and should those within the Control Room feel it necessary an EMN would be issued and they would do so; they would not take direction from outside the Control Room not to do so. It was explained to us by more than one witness that issuing EMNs *"is not unusual"*, and EMNs are a part of the Control Room's operational planning process, and used *"as an additional tool that we can actually use in the Control Room to manage the system"*.
- 4.4.28 We were also told about a change in industry trading practice that came into force in May 2026, which impacted the ability of the Control Room to counter-trade electricity on the interconnectors. A market notice dated 14 May 2026 (effective 20 May 2026) introduced restrictions on interconnector trading, limiting trades in the opposite direction to the Day Ahead scheduled position to 300MW, with a total cap of 1,500MW across the six interconnectors available for within-day auctions. There were multiple references to this within the mobile

phone call recordings from the Control Room. We were told that the change was introduced at very short notice, at a time when the Control Room had been working with a number of existing constraints (e.g. in Scotland), and against a “market that believes there’s an infinite busbar”. This change impacted the energy desk, as this meant they were unable to call on reserves that had previously been available:

*“... a lot of the short notice plant that we wouldn't necessarily have considered as being reserved previously, is now being run for energy. So when we do get large swings on the interconnectors post 20th of May, we haven't got those levels of uncouneted, uncontracted reserve that we once had”.*

- 4.4.29 Any further investigation of this issue, however, would stray beyond the scope of this Review. However, our interpretation of the above is that the week of 22 June 2026 represented the first significant challenge faced by the Control Room after this industry directive was issued, and this could explain the way in which decisions were made and how demand constraints were handled. This is something the Technical Review may wish to consider in further depth.

#### **Operational Requirements**

- 4.4.30 We have reviewed the applicable NESO BPs governing the management of events where system frequency becomes unstable and falls below the normal operating frequency limits set out in the SQSS, being principally:
- 4.4.30.1 BP1521 (Power System Risk Management);
  - 4.4.30.2 BP1260E (Energy Balancing Best Practice);
  - 4.4.30.3 BP1260T (Transmission Security Best Practice); and
  - 4.4.30.4 BP1023 (NESO Management Reporting, Investigation and Action Tracking).
- 4.4.31 The events of 23 June 2026, as described above, engaged a number of these procedures. The frequency deviation to 49.67Hz, the issuing of an Emergency Instruction to BritNed, and the request for Emergency Assistance from RTE all fall within the escalation framework set out in the BPs. The FER (FER F/2026/00265) and a Significant Event Report (“**SER**”) (SER/INC/2026/00752) were produced in accordance with BP1023. Whilst this Review did not find any obvious deviations from these procedures, witness evidence was mixed as to whether the full suite of escalation actions, including the issuance of a HRDR notice and a DCI warning, should have been taken at an earlier stage, and whether the totality of actions taken on the evening of 23 June were consistent

in all respects with the procedures set out above. As noted at paragraph 4.4.29, this is a matter which should be addressed by the Technical Review.

4.4.32 Insofar as logging practices within the Control Room are concerned, it appears that the position was as follows for the week commencing 22 June:

4.4.32.1 **PSM Handover Log:** A detailed weekly handover log was maintained for the week commencing 22 June 2026, covering day-by-day operational activities, shift cover arrangements, customer interactions, system tests, outages, and IT changes. This log recorded entries for each day (Monday through Friday), identifying the Duty PSM and Duty Officer for each shift.

4.4.32.2 **TSE Scotland Handwritten Logsheets:** The NESO Electricity National Control Centre maintained handwritten logsheets for the TSE Scotland desk across the full week (22–26 June 2026), with entries by named Control Engineers. These logs recorded switching instructions, outage notifications, and operational messages with timestamps, locations, and the names of senders/receivers.

4.4.32.3 **Control Room Audit Box Logs:** Separate daily communication/decision logs were completed for 22, 23, 24, 25, and 26 June 2026, covering multiple desks including the Operational Energy Manager, Energy Optimisation Engineer, Assistant National Scheduling Engineer, and Control Technical Assistant. These logs captured operational decisions, instructions, and messages across shift periods (00:00–07:30, 07:30–14:30, 14:30–21:30, 21:30–24:00).

4.4.32.4 **TSM Daily Reports:** Daily operational reports were produced, documenting faults, events, circuit trips, customer interactions, and value creation for each 24-hour period.

4.4.32.5 **Zonal Balancing Logs:** Zonal Balancing Log sheets were maintained for the North zone, recording frequency control instructions, EDL outages, and independently-actioned events, with reminders that *"all operational and commercial communications / decisions are recorded on the reverse of the logsheet"*.

## Findings

4.4.33 ESI finds that, on 23 June 2026, the Control Room faced an unprecedented situation due to a combination of factors outside of its control. Tight margins

were described as not unusual, but the particular scenario that occurred on 23 June was out of the ordinary because of the time of year (with tight margins of this nature normally occurring in the winter) and due to the specific heatwave demands across both the UK and Europe simultaneously, which impacted the markets as a whole, with last minute trades and network constraints meaning that electricity generation was suddenly not available to NESO when it was needed.

- 4.4.34 Witness evidence was mixed as to whether established protocols for issuing system warnings were followed on 23 June, including whether HRDR and DCI warnings should have been issued. A number of witnesses stated that they would not have done anything differently when reflecting on the events of 23 June 2026 (whether they were on shift or not). This should therefore be considered by the Technical Review.
- 4.4.35 One witness felt that *"people have different views on what stable means"* – and that when it comes to operating outside the operational limits (of 49.8Hz and 50.2Hz), some might consider that situation to be unstable, whilst others might not, because the system is arguably still within statutory limits.
- 4.4.36 A cultural reluctance around marginal EMN cases is identified by the evidence. Witnesses described concern about market impact, media scrutiny and post-event criticism. That reluctance may affect timing and escalation in borderline cases, but this is not the same as a formal directive not to issue an EMN or any other warning notice – and no such evidence has emerged as part of this Review. Instead, the impression given by the witness evidence is that the Control Room found itself in a highly pressured and stressful situation, and some individuals felt a sense of unease or disagreement as to how the situation was being handled and reported externally.
- 4.4.37 It is not within ESI's expertise, however, to make any findings as to the accuracy or otherwise of the external statements released in relation to the EMN and the state of the Control Room. This would be a matter for the Technical Review.

## 4.5 **ToR 4: Corporate affairs interference**

**To avoid reputational damage, Corporate Affairs personnel interfered in operational decisions to urge that certain operational stabilising actions were not taken and that due to the use of 'live documents', these interventions were not recorded for public record**

## Evidence Base

- 4.5.1 The allegation in respect of the use of 'live' documents has been addressed as part of ToR 2 above. All witnesses who were asked denied that Corporate Affairs interfered in operational decisions of the Control Room. A senior operational manager called the suggestion "*preposterous*", whilst another described this as "*laughable*", and this denial was consistent from witnesses both inside and outside of the Control Room.

*"Corporate affairs do not influence our operational decisions."*

*"we never had a situation where the corporate affairs calls us and telling us that we should do this to avoid doing this, because at the end of the day... we have the responsibility of managing the system."*

*"regardless of what someone says, the person that's sitting in the seat is responsible and accountable for what's going on, on that day... that is what it is our job to do that, to make those difficult decisions."*

*"I've never had a situation where someone has told me I can't do something that I think is the right thing to do."*

*"there wouldn't have been any time for any influence from outside to do anything about that... because it's a situation that's arising in real-time. And it's a real-time person to manage the situation."*

- 4.5.2 In terms of liaison between the PSM and the Corporate Affairs team, it was explained that this is a necessary part of the PSM's role; they have a duty to inform stakeholders if there is a situation within the Control Room that has the potential to affect consumers, and this necessarily involves letting senior executives and media teams know what is happening and how the Control Room is responding. We were also unanimously told that the only individual within the Control Room who engages with Corporate Affairs is the PSM.

- 4.5.3 ESI did identify, in relation to the events of 23 June, that a briefing was written by the Corporate Affairs team on the issuing of the EMN, which was then quickly amended as a technical error was noted by someone in senior management. This was explained to ESI as an innocent error made by the Corporate Affairs team. Whilst the Corporate Affairs team is generally knowledgeable, they are not specifically trained and do not carry any Control Room authorisations, and therefore are understandably not able to accurately describe the specific technical happenings of the system. One can see how this could be misinterpreted as an attempt to alter, or gloss over the factual reality of the situation however, in reality this was a feature of communications drafting and fact checking to ensure that accurate information is published.

- 4.5.4 For the briefing mentioned above, the original version states that the ~5GW discrepancy in generation was identified "*between the two models*". The revised version replaces this with more specific language, stating the discrepancy was identified "*between the data available at day ahead from REMIT and the data provided to the Control Room via the Balancing Mechanism*". This change provides significantly more detail about the source of the discrepancy, pinpointing the issue as a mismatch between REMIT day-ahead data and Balancing Mechanism data rather than a vague reference to "two models."
- 4.5.5 The recorded telephone communications reviewed for this investigation are consistent with the above position. In each call involving the Corporate Affairs team, the interaction concerned the coordination of media statements and stakeholder communications following an operational decision that had already been taken. For example, one PSM informed the press office: "*margin brief's just been sent... and the EMN is about to be issued. We're sending it at 10 o'clock*", to which the press office responded by preparing its communications. No recording contains any instance of Corporate Affairs personnel seeking to influence, delay or prevent an operational decision.

## **Findings**

- 4.5.6 The evidence does not establish that Corporate Affairs gave direct operational instructions to the Control Room to only use 'live' documents, or that Corporate Affairs personnel interfered in operational decisions during the week in question. No recording of telephone communications contains any instance of Corporate Affairs personnel seeking to influence, delay or prevent an operational decision. All Control Room operatives confirmed that they hold the relevant authorisations and would not be influenced by outside pressures not to make what they believe to be the correct operational decisions.
- 4.5.7 A briefing produced by the Corporate Affairs team relating to the events of 23 June was quickly amended to correct a technical error. As set out at paragraphs 4.5.3 and 4.5.4 above, this is explicable as a fact-checking correction by individuals who, whilst generally knowledgeable, are not specifically trained in Control Room operations and do not carry authorisations. As noted above, ESI finds that technical errors in drafting may occur when carried out by external communications teams, and it is right to ensure facts are checked and are accurate before releasing external communications.
- 4.5.8 The investigation has, however, identified evidence of a broader culture of reputational sensitivity which, whilst not amounting to direct interference by Corporate Affairs, is relevant to understanding the operational environment in which decisions were taken. These wider cultural observations are addressed in Section 5 at paragraphs 5.13 – 5.18 below.

## 5. CONCLUSIONS AND RECOMMENDATIONS

### Conclusions

- 5.1 Our overall conclusions against the four primary limbs of the ToR are outlined below, under **Section 1**. In **Section 2**, we have set out our wider conclusions, based on the documentary evidence and witness testimony obtained during our investigation, in line with the wider scope of the ToR, which states:

*"Should wider issues be identified during the course of the investigation, which extend beyond the events of the week commencing 22 June 2026 (such as any wider whistleblowing concerns within the Control Room), then ESI will consider and recommend whether further investigation is required in respect of those issues, as part of this investigation or separately. Where relevant, ESI will include information in respect of those concerns within the report, maintaining the anonymity of the individual raising the concerns."*

- 5.2 Our wider observations and conclusions are therefore included here, as we consider these to be a fundamental part of the overall picture in relation to Control Room operations during the week commencing 22 June 2026, and which serve to explain the reasons behind the whistleblowing incident and the allegations made.
- 5.3 It will be a matter for NESO to consider these conclusions in the round, alongside the evidence presented, and to consider what steps, if any, should be taken in response.

### Section 1 – Conclusions ToRs 1 to 4

#### ToR 1 (Alteration of records): Not established on the evidence reviewed.

- 5.4 Based on our review of over 300 documents, including Control Room logs, standard operating procedures, SOPs, ENCC status reports, system warnings data and internal communications, and the testimony of 36 witnesses, we have found no evidence that operational records were deliberately altered, deleted or not kept in order to circumvent FOI obligations (Section 4, paragraphs 4.2.13–4.2.18). No witness reported receiving an instruction to delete, alter or suppress records, and we did not locate any written evidence of inappropriate version changes being made (Section 4, paragraph 4.2.14). One witness described an evolved practice around keeping confidential documents in a 'draft' state with a view to avoiding disclosure, but this account was not corroborated by any other witness or documentary evidence, and could not be connected to the events of the week in question (Section 4, paragraphs 4.2.9–4.2.11, 4.2.17). A further witness explained that changes had been made to a report relating to 23 June 2026, but these were to correct a technical description and are addressed under ToR 4 (Section 4, paragraph 4.2.12). This review finds

that, in respect of this singular strand of evidence, an assumption, or leap, has been made between the general concerns expressed and the specific events of 23 June 2026.

**ToR 2 (Live documents): Not established on the evidence reviewed; however, version control practices require improvement.**

- 5.5 Live documents are a longstanding feature of Control Room operations, pre-dating FOIA obligations (Section 4, paragraph 4.3.2). The Control Room uses a mix of handwritten logs, Word-based handover documents, Excel-based management spreadsheets and system-generated outputs (Section 4, paragraphs 4.3.2–4.3.6). Handwritten logs are signed, timestamped and retained, and system-generated SOPs are saved as individually numbered PDF snapshots, meaning these cannot be retrospectively altered (Section 4, paragraphs 4.3.3, 4.3.6). However, certain electronic documents, particularly Word-based handover documents and Excel-based reports stored on the local "S Drive", lack robust version control; successive saves overwrite the previous state without preserving version history (Section 4, paragraphs 4.3.24–4.3.27).
- 5.6 There is no evidence that Senior NESO managers instructed operators to keep live documents with no version history to ensure there is no audit trail, nor as a means of avoiding the preservation of records for FOI purposes (Section 4, paragraph 4.3.34). The overwhelming majority of witnesses expressed confusion or scepticism about the allegation (Section 4, paragraphs 4.3.32–4.3.34).

**ToR 3 (Events of 23 June 2026): The specific allegation that record-keeping malpractice was in effect during the frequency incident of 23 June 2026 is not established. However, witness evidence is mixed as to whether established escalation protocols were fully followed, and this question should be deferred to the Technical Review.**

- 5.7 On the evening of 23 June 2026, system frequency dropped to 49.67Hz, below NESO's internal operational range, owing to a combination of extreme heat, low wind generation, reduced plant availability and a last minute swing in IFA (as described at Section 4, paragraphs 4.4.7–4.4.11). The Control Room managed to bring the incident under control through rapid dispatch of generation and battery resources, emergency instructions to interconnectors, and coordination with neighbouring system operators (Section 4, paragraph 4.4.15). We reviewed the PSM Handover Log, TSE Scotland Handwritten Logsheets, Control Room Audit Box Logs, TSM Daily Reports and Zonal Balancing Logs for the relevant week and did not identify discrepancies between the recorded position and witness testimony (Section 4, paragraph 4.4.32).
- 5.8 However, witness evidence was mixed as to whether the full suite of escalation actions, including the issuance of a HRDR notice and a DCI warning, should have been taken at an earlier stage. A cultural reluctance around marginal EMN cases is identified by the evidence, with witnesses describing concern about market impact, media scrutiny and post-event

criticism, though this does not establish a formal directive not to issue an EMN (Section 4, paragraph 4.4.36).

- 5.9 The question of whether all procedural requirements were met on 23 June should be deferred to the Technical Review (Section 1, paragraph 1.13; Section 4, paragraph 4.4.29).

**ToR 4 (Corporate Affairs interference): Direct interference not established; however, a potential indirect pressure pathway through reputational sensitivity is identified.**

- 5.10 The majority of witnesses denied that Corporate Affairs directly interfered in any operational decisions or activities taking place within the Control Room (Section 4, paragraph 4.5.1). One witness described that a potential indirect pressure pathway could have been imposed via senior management linking the Corporate Affairs team into mobile calls during 23 June, but this was not corroborated (Section 4, paragraphs 4.5.3-4.5.5). All Control Room operatives confirmed that they hold the relevant authorisations and would not be influenced by outside pressures not to make operational decisions they believe to be correct (Section 4, paragraphs 4.5.1).
- 5.11 However, the evidence does establish that a culture of reputational sensitivity existed in which concerns about external perception were communicated to operational staff, whether directly, through senior management, or through perception (Section 5, paragraph 5.14).
- 5.12 A briefing produced by Corporate Affairs relating to 23 June was quickly amended to correct a technical error. This is explicable on its own terms as a routine fact-checking correction, to ensure accuracy in external communications (Section 4, paragraphs 4.5.3, 4.5.4; Section 2, paragraphs 2.3.1 and 2.3.4).

**Section 2 – Wider Observations and Conclusions**

- 5.13 The investigation identified evidence of a broader culture of reputational sensitivity within NESO, in which concerns about external perception were communicated to operational staff, whether directly, through senior management, or through perception.
- 5.14 One witness described an "*implicit understanding and expectation from the leadership to hear what they want to hear*" and stated that they felt a degree of pressure to convey a positive message, describing the expectation that people make sure "*everything's fine*". Another witness supported this by describing a cultural bias towards presenting good news, which they believe starts at the top of the organisation.
- 5.15 Several witnesses stated that, whilst they are clear they hold the authorisations to make the necessary operational decisions, they are aware of the wider implications of those decisions on the energy markets and, inadvertently, on NESO's reputation. For example:
- 5.15.1 One witness explained that the reputational impact on NESO is taken into consideration in the Control Room, but described this as an awareness of the

consequences of decisions rather than a factor that would prevent necessary action. When considering whether to issue an EMN, they would consider the impact on NESO and its position in the market, but stated this would not negate them making the decision; rather, it would inform how the impact was monitored.

- 5.15.2 Another stated more broadly that EMNs should be issued *"without any fear"* but *"unfortunately we are not in that space"*, and that there is a background awareness of reputational and media considerations that means an EMN tends to be treated as *"almost the last resort"*.
- 5.15.3 A different witness explained that, since the incident on 23 June 2026, the energy desk is *"really risk averse now"* and that they *"always run the extra machine now to make sure that [they] always have enough megawatts"*. Whilst we were also told that EMNs had become associated with *"bad press"* and another individual attributed hesitation to market-cost concerns.
- 5.15.4 We also heard about an incident which a witness explained they had been told about more recently, whereby *"preparations were being done to make an HRDR and go to that next level, but then apparently a senior manager came in, there was a discussion and then it wasn't... issued"*.
- 5.16 We were told by a witness that much of this followed a perception change, noting that at some point (at least by 2019), EMNs became seen as something uncomfortable to issue; something that would create *"bad press and lots of enquiries"* and be perceived as showing that NESO had been *"irresponsible"* and that *"the market had not provided enough electricity"*, despite NESO's role being to operate the electricity system using the energy generated and made available to it.
- 5.17 This was said to have led to a culture where staff are expected to explore every possible option before issuing an EMN, including reassessing constraints, confirming wind and demand forecasts, and testing all available tools. One witness stated that this scrutiny is *"absolutely right"* and *"should be part of every single shift"*, but questioned *"how far you are prepared to go with all the assumptions you are using to ensure that... you don't need to raise EMN"*. Whilst NESO's reputational impact is taken into consideration in control room decision-making, this was described as being *"to some extent"* from a *"good... angle"*, in the sense of ensuring all available tools have been explored and all options exhausted before issuing a system warning.
- 5.18 These observations do not establish that reputational considerations have overridden operational judgement in any specific instance. They do, however, identify a cultural environment in which the perception of external consequences may affect the timing and confidence with which operational warnings are issued, particularly in marginal cases. This concern is addressed by Recommendation 7 below.

## Culture of non-response and perceived inaction

- 5.19 A senior engineer stated that “*you don’t see anything*” when concerns are raised. One witness explained that staff go outside the organisation because “*they don’t believe any action will be taken*”. A Control Room manager described a culture in which “*everything is good news*” and that if anything is wrong, it must be reported as resolved by the following day as nothing else would be accepted. A senior individual acknowledged that escalation awareness was “*mixed*”, and several witnesses stated that the feedback loop for raised concerns needed improvement. Because individuals do not see outcomes when queries are raised, some may now avoid raising concerns altogether, perceiving little point in doing so when nothing appears to change.

*“The reason people are going outside is because they think that even if they do raise something anonymously through a third party, it goes internally, they don’t believe any action will be taken.”*

- 5.20 Another witness expressed frustration that Government does not appear to listen to or act upon views expressed by NESO on behalf of Control Room staff, citing in this regard “*things that are completely outside our control that NESO has tried to pursue, but then don’t happen... we have to still be able to hold it together, even though we’ve said this is what we need to hold it together*”.

*“I see people giving feedback. Not much happens with that feedback.”*

- 5.21 One witness suggested that “*if this was done by a person from within, then it might mean that [they] might have tried to escalate things and [they] found things not working for them*”.

- 5.22 A number of witnesses described a culture of apathy towards reporting concerns, attributing this to the absence of a feedback loop, which they felt demonstrated that issues were not being taken seriously and acted upon.

*“We have been raising a number of things and some of them you see them coming to fruition. But some of the things that you raise, at times you don’t see them in a very long time.”*

*“There isn’t a route internal that’s actually going to result in change. That isn’t to say that there isn’t a route, but the result very much seems to be that.”*

- 5.23 There is a significant gap between NESO’s formal Speak Up Policy commitments and the lived experience described by multiple witnesses (Section 2, paragraph 2.6.2). While the evidence does not show that internal escalation routes are unavailable, it demonstrates a recurring perception that concerns are not acted upon or fed back effectively. This perception is itself a material cultural and governance concern and helps explain why individuals felt the need to raise concerns externally (Section 2, paragraph 2.6.3-2.6.7).

## Wider whistleblowing concerns

5.24 All witnesses asked confirmed awareness of NESO's Speak Up Policy and stated they felt able to raise concerns or questions with line managers. However, several witnesses caveated this by expressing doubt that action would follow even if they did raise matters internally (see section above regarding non-response and inaction). Our interpretation is that some witnesses felt apathetic towards the escalation process, notwithstanding its existence.

5.25 Another witness described a culture change in recent years, with NESO leadership deferring to Government and seeking to "*appease the market participants*". This was said to have filtered down to PSMs, who previously would "*stand up for the Control Room*" but now bent to pressure from above to make decisions driven more by customer scores than by NESO's licence requirement to act in the interests of end-consumers. An example was given regarding past decisions which were introduced despite Control Room push-back<sup>8</sup>. This has led experienced operatives either to find alternate roles or to stop speaking up:

*"I think we've seen people who put their head above the parapet, even at PSM level, that will go out to bat for you. It doesn't last very long. They get beaten down and either they find something else to do or they become very quiescent".*

5.26 An example was also given of this culture extending to other teams outside the Control Room, where it was alleged an individual who had raised internal concerns about a particular project was disciplined for not 'toeing the official line'.

5.27 It is beyond the scope of this Review to look into the specifics of this allegation, and whether any such disciplinary took place.

## Disconnect between the ENCC and Executive Leadership

5.28 Multiple witnesses expressed the view that senior leadership and executive personnel do not fully appreciate how the Control Room operates or the pressures faced by operational staff (Section 2, paragraph 2.6.2). This has given rise to frustration, particularly when external communications — such as the press release stating that the system was "not at risk" on 23 June — were perceived by operational staff as misrepresenting the situation as the statement was issued prior to full investigation. The evidence suggests that this disconnect has contributed to a loss of confidence in executive leadership among some operational staff and to a culture in which experienced operatives have either left or disengaged from raising concerns (Section 2, paragraph 2.6.3).

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<sup>8</sup> Note that further detail cannot be included here for risk of identification of the witness.

## **Operational stress and systemic pressures on the Control Room**

- 5.29 There are high levels of stress and concern within the ENCC regarding the current state of the energy industry and the longer-term ability to maintain system balance, given the challenges of the net zero transition and increased reliance on renewables, which are less flexible than conventional generation, as well as current energy market structures (Section 2, paragraph 2.6.1). These pressures were compounded by new interconnector trading limits introduced in May 2026, which restricted the tools available for managing tight margins (Section 4, paragraphs 4.4.28–4.4.29). These systemic pressures form important context for both the events of the week commencing 22 June 2026 and the subsequent allegations.

## **Variability in logging practices and version control gaps**

- 5.30 Although the allegation of deliberate alteration of records is not established, the investigation has identified material variability in logging practices across desks and an arguable gap in the audit trail for certain operational reports (Section 4, paragraph 4.3.26; Section 2, paragraph 2.3.2). The OSM Reports for the week of 22 June, for example, were only populated for 26 and 27 June; the remainder were left blank (Section 4, paragraph 4.2.2.6). Certain electronic documents stored on the S Drive lack automatic version tracking, meaning successive saves overwrite previous states (Section 4, paragraph 4.3.26). Witnesses attributed these gaps to operational pressure and time constraints rather than any intent to conceal (Section 4, paragraph 4.2.7); nonetheless, the gaps present a risk to NESO's ability to demonstrate robust governance.

## **Summary**

- 5.31 Our investigation has not substantiated any of the four specific allegations set out by the ToR (Section 2, paragraph 2.4). It is our opinion, however, that the allegations arose for a number of underlying reasons, principally, high levels of operational stress, a significant disconnect between the ENCC and executive leadership, a culture of reputational sensitivity affecting the perception of operational independence, and a gap between formal Speak Up commitments and the lived experience of staff (Section 2, paragraphs 2.6.2, 2.7). These wider concerns, whilst not establishing any of the four specific allegations, identify control, cultural and governance issues that should be addressed through the recommendations set out below.

## **Recommendations**

- 5.32 The Panel submits this Report to the NESO Board together with the following recommendations. These recommendations are directed at the NESO Board for its consideration. It will be for management to review, develop, and take ownership of detailed implementation proposals, and for the NESO Board to satisfy itself that these are being appropriately progressed. Upon submission of this Report to the NESO Board, the Panel's

work in relation to this investigation is complete, and responsibility for progressing these matters passes to the Board and management.

| Recommendation          | Action                                                                                                                                                                                                                                                                                                       |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Recommendation 1</b> | The NESO Board should consider how to remediate version control gaps for electronic operational records, including the migration of operational documents to a platform with automatic version history and the implementation of standardised protocols for shift handover documents and management reports. |
| <b>Recommendation 2</b> | The NESO Board should consider how to standardise and enforce logging practices across all Control Room desks, addressing the identified inconsistencies and introducing compliance mechanisms to ensure logs are completed each shift.                                                                      |
| <b>Recommendation 3</b> | The NESO Board should consider commissioning a comprehensive review of the Speak Up Policy and its practical effectiveness, focusing on the gap between formal commitments and the lived experience of staff as identified in this investigation.                                                            |
| <b>Recommendation 4</b> | The NESO Board should consider establishing a structured feedback loop for concerns raised by Control Room staff, ensuring that concerns are tracked, acknowledged, and reported back to individuals within a defined period.                                                                                |
| <b>Recommendation 5</b> | The NESO Board should consider how to bridge the disconnect between the ENCC and the Executive Leadership Team, including through structured engagement programmes and defined processes for Control Room input into external communications concerning system events.                                       |
| <b>Recommendation 6</b> | The NESO Board should consider implementing a protocol for Corporate Affairs involvement in operational communications, requiring that any external communication describing technical operational matters is reviewed and approved by an authorised Control Room operative prior to publication.            |
| <b>Recommendation 7</b> | The NESO Board should consider how to address the culture of reputational sensitivity affecting operational decision-making, including through targeted training to reinforce that operational                                                                                                               |

decisions must be made solely on the basis of operational and engineering judgement.

## APPENDIX A - 07 JULY 2026 LETTER TO ICO



### HOUSE OF COMMONS

LONDON SW1A 0AA

Paul Arnold MBE  
Information Commissioner  
Wycliffe House, Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

7<sup>th</sup> July 2026

Dear Paul,

I am writing to formally request that the ICO open an investigation into allegations that the National Energy System Operator (NESO) has been deliberately altering its operational record-keeping to avoid public scrutiny under Freedom of Information law.

I have been contacted by whistleblowers who allege that, during periods of system stress, senior NESO managers have instructed operators in the control room to keep 'live documents' with no version history. This is allegedly in order to ensure that there is no audit trail or records of how key operational decisions are made and ensure that full records are not preserved for the purposes of FOI.

Concerningly, whistleblowers allege that this approach was in place during an incident on Tuesday 23<sup>rd</sup> June 2026, where the frequency of the system became unstable and fell below NESO's normal operating frequency limit of 49.80Hz. This is a serious matter because if such frequency instability is sustained, blackouts can occur.

Staff in the Corporate Affairs directorate allegedly interfered in operational decisions to urge that certain operational stabilising actions *were not taken*, in order to avoid damage to NESO's reputation. Due to the use of 'live documents', these interventions were not recorded for public record.

This is of serious consequence as our electricity grid is becoming increasingly unstable and difficult to manage. Decisions appear to be taken within NESO to avoid the disclosure of information that could be used to determine whether NESO is capable of maintaining operability within the Security and Quality of Supply Standard (SQSS). It is vital that the public and Government know whether NESO is allowing reputational concerns to override the ability to keep the system stable.

I am therefore urging you to:

- **Launch an inquiry into NESO's records management practices, with a particular focus on events in the control room during times of system stress.**
- **Interview operation managers within the control room to establish whether management are requiring them to hide information that shows the electricity system is not being run securely.**
- **Take action to ensure that NESO complies with all information transparency regulations.**

Whether NESO can operate the electricity system securely is clearly a matter of public interest. I would be grateful if you could investigate urgently and keep me informed of progress.

Yours sincerely,

*The Rt Hon Claire Coutinho MP*  
**Shadow Secretary of State for Energy**

## APPENDIX B - 10 JULY 2026 LETTER TO NESO



HOUSE OF COMMONS  
LONDON SW1A 0AA

Mr Fintan Slye  
CEO, National Energy System Operator  
Faraday House, Warwick Technology Park  
Warwick  
CV34 6DA

10<sup>th</sup> July 2026

Dear Fintan,

### GRID STABILITY WHISTLEBLOWERS

As you will know, after being approached by a whistleblower from within NESO, on Tuesday 7<sup>th</sup> July I raised concerns in the House of Commons about the stability of our electricity grid and events that took place on Tuesday 23<sup>rd</sup> June.

These concerns related to allegations that NESO management had instructed operators to hide information that the grid was not secure at all times on Tuesday 23<sup>rd</sup> June. They also related to allegations that Corporate Affairs staff had interfered with operational decisions required to stabilise the grid, in order to avoid those actions becoming public and to avoid damage to NESO's reputation.

Since I raised this in the House of Commons, I have been approached by further whistleblowers from within NESO who have echoed those concerns and raised further questions about the security of the grid.

I would be grateful if you could provide clear, direct answers to the following questions:

1. On the evening of 23<sup>rd</sup> June 2026, the Electricity Transmission System Frequency fell below the lower Operational Limit of 49.8Hz for multiple periods of up to 30 minutes. The Security and Quality of Supply Standard (SQSS) states that the System Frequency must be recovered to Operational Limits within 15 minutes. Were the requirements of the SQSS breached?
2. On the evening of 23<sup>rd</sup> June 2026, did NESO exceed any System Constraint Limits?
3. Between 19:00 and 19:30 on 23<sup>rd</sup> June 2026, did NESO have any positive reserve left on the system, and would the system have remained secure if the largest single point of infeed (sources of supply such as generation, batteries or interconnectors) had been lost?
4. At any point on 23<sup>rd</sup> June 2026, did Corporate Affairs staff raise concerns about operational decisions to manage the security of the electricity system being made public, and the effect that would have on NESO's reputation?
5. Have control room engineers, at any point, used 'live documents' without version history to manage operational decisions relating to grid stability and frequency or voltage management?

I understand that you have shared your internal whistleblowing procedure with NESO staff should they wish to raise concerns. However, whistleblowers have told me that they do not have confidence in the anonymity of this process. They feel that if raised internally, their concerns will be dismissed rather than investigated with urgency.



The reason that NESO staff are speaking to a Member of Parliament is because they are seriously concerned that their job to balance the grid is becoming unmanageable, and they do not feel able to raise those concerns within NESO.

Will you therefore:

6. **Appoint an independent external investigator to interview control room engineers anonymously so that they can raise concerns about grid stability and operating procedures without fear of repercussions?**
7. **Provide a clear statement of what protections NESO will offer for whistleblowers who raise concerns via Members of Parliament?**

Few things are more important than our ability to operate a reliable and secure electricity supply. If the grid is becoming unmanageable, or if the standards required are not sufficient to run the grid securely, then we need transparency and honesty about these challenges so that we can improve our system.

For that reason, I am copying this letter to Dr Paul Golby, Chair of NESO, the Chancellor of the Duchy of Lancaster, and the Secretary of State for Energy Security and Net Zero for their information.

I look forward to your reply at the earliest opportunity.

Yours sincerely,

*The Rt. Hon. Claire Coutinho MP*  
**Shadow Secretary of State for Energy**

*CC: Dr Paul Golby CBE, Chair, NESO*

*The Rt Hon Darren Jones MP, Chancellor of the Duchy of Lancaster*

*The Rt Hon Ed Miliband MP, Secretary of State for Energy Security and Net Zero*

## APPENDIX C - 20 JULY 2026 LETTER TO CCMP



The ICO exists to empower you through information.

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
T. 0303 123 1113  
[ico.org.uk](https://ico.org.uk)

By email: [lewis.ilsley@parliament.uk](mailto:lewis.ilsley@parliament.uk)

20 July 2026

Dear Claire Coutinho MP,

Thank you for your correspondence regarding concerns about the National Energy System Operator's (NESO's) retention of information relating to operational decisions made during the power outage on 23 June 2026. Your concerns have been passed to me to respond in my capacity as Director of Freedom of Information & Transparency at the Information Commissioner's Office.

I appreciate the importance of the issues you have raised and recognise the public interest in ensuring that decisions relating to the operation of critical national infrastructure are appropriately documented and scrutinised.

Having carefully considered the matters you have raised, it may be helpful to clarify the role of the Information Commissioner's Office (ICO) in relation to the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR).

FOIA and EIR provide rights of access to information that is already recorded and held by public authorities. Their purpose is to ensure transparency by enabling individuals to request access to information that exists at the time a request is received. We do not have powers under FOIA or the EIR to determine what information should have been recorded in the first instance. Similarly, the ICO's investigative powers under FOIA and EIR do not extend to compelling individuals to be interviewed in order to establish what discussions took place or what decisions were made. Our consideration is based on recorded information held by the public authority and the evidence available to us regarding its handling in response to the information requests it has received.

You also refer to concerns about NESO's record keeping practices. The Secretary of State has issued guidance under Section 46 of FOIA, in the form of the [Section 46 Code of Practice on Records Management](#), which sets out a framework of good practice for the creation, management and retention of records. The Code is intended to assist public authorities in

establishing effective records management arrangements and promoting accountability and transparency. However, the Code is non-binding guidance rather than a statutory requirement. As such, unlike in relation to other areas of FOIA, the ICO's powers in relation to a breach of the Code are limited to non-enforceable practice recommendations. We issue these on a case-by-case basis when we have specific evidence that public authorities are systemically failing to comply with any of the provisions in the FOIA Codes of Practice

Many of the concerns raised in your letter appear to extend far beyond access to information law. They relate more fundamentally to whether records of certain operational decisions ought to have been created and retained given their significance to the operation of the electricity system and, crucially, whether operational decision-making was compromised. These matters would be more appropriately considered by the relevant sector regulator. We would therefore suggest also raising these concerns with Ofgem, which is better placed to assess whether NESO is subject to regulatory obligations or industry standards both in relation to operational decisions made, and the recording and retention of specific information for operational, governance or compliance purpose.

NESO have written to us proactively setting out the steps they are taking to explore the types of issues you have raised and have committed to share the outcome of the investigation they have already commissioned. The ICO is under unprecedented pressure in relation to the volume of complaints it is receiving under FOIA and the EIRs. I can assure you, however, that we will carefully review the further information NESO provide and will continue to monitor our complaint volumes in relation to NESO, as well as the specific issues that are raised. Where we identify any trends or significant issues that require intervention from the ICO, including in relation to the codes of practice, we will take the appropriate level of action. This would be published on our website as is the case with all the action we take under FOIA.

I hope this explanation is helpful in clarifying the ICO's role, please let me know if you have any further questions.

Kind regards

Warren Seddon  
Director of FOI & Transparency  
(sent via email)

## APPENDIX D - TERMS OF REFERENCE

### **NESO - Investigation following alleged whistleblowing**

#### **Background**

Following alleged whistleblower contact received by the Shadow Secretary of State for Energy, The Right Honourable Claire Coutinho MP (CC), a letter dated 7<sup>th</sup> July 2026 was submitted to Information Commissioner, Paul Arnold MBE, requesting an investigation into allegations that:

1. NESO has been deliberately altering operational records to avoid public scrutiny under Freedom of Information (FOI) law.
2. During periods of system stress, Senior NESO managers have instructed operators in the Control Room to keep 'live documents' with no version history to ensure there is no audit trail or records of how key operational decisions are made and to ensure records are not preserved for the purposes of FOI.
3. The aforementioned approach was in effect during an incident on Tuesday 23<sup>rd</sup> June 2026 where system frequency became unstable, and fell below normal operating frequency limits set out in the Security and Quality Supply Standard (SQSS).
4. To avoid reputational damage, Corporate Affairs personnel interfered in operational decisions to urge that certain operational stabilising actions were not taken and that due to the use of 'live documents', these interventions were not recorded for public record.

A further letter repeating these allegations was received by NESO on 10 July 2026. In this letter, it is alleged that further whistleblowers have contacted the Shadow Secretary of State for Energy, The Right Honourable Claire Coutinho MP.

On 9 July 2026, Zoe Morrissey, NESO Director of Legal and Regulation, asked Eversheds Sutherland (International) LLP (ESI) to conduct an independent investigation into the above allegations.

NESO is conducting a separate technical review into the events of w/c 22 June 2026. This will be conducted under a commission from Ofgem under NESO'S Electricity System Operator Licence Condition C7.5 (*Part B: Post-event and post-emergency analysis*). The terms of reference for this will be published separately.

#### **Scope & Approach**

ESI's work will involve:

- Interviews with Power System Managers (PSMs) and other Control Room personnel who worked on shift during the week commencing Monday 22 June 2026 until Friday 26 June 2026. The full list of relevant staff will be confirmed by the independent panel and may include roles not put forward by NESO. The interviews will seek to determine:
  - Details of policies and procedures pertaining to the operational decisions and record keeping within the Control Room generally;
  - How operational decisions were made, documented, version controlled and retained generally;
  - When those processes/recording of data policies and procedures were last changed and how, and if any of those changes were in response to FOI concerns;
  - Whether NESO reputational impact was as a matter of fact taken into account as a factor when the Control Room made its decisions during the week commencing 22 June 2026;
  - Whether they consider there was any pressure by management and/or Corporate Affairs during the week commencing 22 June 2026 not to document instances of system stress/security due to adverse reputational impacts that NESO could face.
  - Whether they consider that, in circumstances where they have concerns, they are clear and confident in how to raise and escalate those concerns.
- Interviews with the Corporate Affairs team who may engage with the Control Room to ascertain:
  - What their typical interactions are with the Control Room;
  - What engagement did they have with the Control Room during the week commencing 22 June 2026;
  - Whether they have any involvement in the decisions made in respect of FOI concerns relating to Control Room decision making.
- Review Control Room and Silver Command logs during the week commencing 22 June 2026.

- Review of standard operating procedures or equivalent for the Control Room relating to retention and documenting of actions that would have applied/been in force during the week commencing 22 June 2026. At the conclusion of its investigation, ESI will draft a report addressed to the Audit and Risk Committee. ESI will make recommendations based on its findings, in line with these Terms of Reference. Should wider issues be identified during the course of the investigation, which extend beyond the events of the week commencing 22 June 2026 (such as any wider whistleblowing concerns within the Control Room), then ESI will consider and recommend whether further investigation is required in respect of those issues, as part of this investigation or separately. Where relevant, ESI will include information in respect of those concerns within the report, maintaining the anonymity of the individual raising the concerns.
- There are a number of individuals who are critical to the investigation as having been directly involved operationally in the period concerned. They will be directly invited for interview. An additional invite will be made to any employee within NESO who has not already been invited for interview, to proactively come forward and contact ESI directly via an ESI dedicated fully confidential email box account and telephone line if they have any information pertinent to the two direct allegations made (interference in operation of the system and record keeping) relating to period concerned. Whether any additional staff come forward, and the details of those individuals not invited for an interview that come forward, will not be shared with NESO.

### **Oversight of the Investigation**

ESI will work independently of NESO and report directly to an independent panel comprised of 3 members being Jayne Scott as Chair of NESO's Audit and Risk Committee & a Non-Executive Director of the NESO Board, Akshay Kaul, Ofgem Director General for Infrastructure and Siobhan Duffy from UKGI in her role as representative of the shareholder on the NESO Board (the **Panel**). Ms Scott will Chair the Panel. Paul Golby, Chair will receive regular updates of progress alongside the Panel unless the Panel, for good reason, advise otherwise.

ESI will carry out all interviews with no NESO attendees present to ensure relevant employees feel able to speak freely. These interviews will be carried out on a fully confidential basis and preserve the anonymity of all interviewees. Where necessary this may require interviews to be conducted online or at a third-party location. An interviewee may be accompanied by a Trade Union representative or another NESO colleague if they so desire.

Any information provided to ESI that is not relevant to the allegations being assessed by ESI but is relevant to the wider security, operation or resilience of the energy system will be passed along directly to Ofgem.

For avoidance of doubt, we expect that no records relating to the matters outlined in this document are altered, deleted, overwritten or otherwise disposed of while the investigation is ongoing. For clarity, this extends to:

- Emails and attachments.
- Microsoft Teams chats, meeting records and files.
- SharePoint sites and live working documents, including version histories.
- Mobile phone records and messages where used for operational discussions.
- Call logs and recordings.
- Operational logs, incident records and control room documentation.
- Risk registers, internal reports and investigation material.
- Any other electronic or physical records relevant to the matters under investigation.

### **Privacy**

All personal data will be handled in accordance with NESO's general privacy notice which can be found [here](#) and any other relevant NESO policies and procedures.

# Regulatory review of the operation and management of the electricity system during the June heat event

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**Publication type:** Transparency document

**Publication date:** 17 July 2026

**Last updated:** 21 July 2026

**Topic:** National Energy System Operator (NESO)

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Decision and terms of reference for investigating incidents of system stress during extreme heat across the week of 22 June.

Ofgem has used its regulatory powers under Condition C7.5 of the ESO Licence to formally commission NESO to deliver post-event analysis and assessment of the incidents of system stress during extreme heat across the week of 22 June. This will cover the weather situation, system conditions and operational decisions, including compliance with all relevant security standards and lessons for the future. Specifically:

1. establish the circumstances that led to the system event on the 23 June 2026 and the EMNs that were issued on the 24 and 26 of June
2. review the actions taken by the control room, system conditions and market actions including what decisions were made and why
3. review and identify if there were any breaches to any of the applicable rules and regulations, including but not limited to ESCQR, Grid Code, SQSS, FRCR and SOGL
4. the sufficiency of control room records to determine all of the above
5. identify any potential learnings from these events to ensure secure and stable system operation in the future
6. share the findings with Ofgem, the Energy Secretary, other government bodies as applicable and ultimately publish

NESO will provide their analysis directly to Ofgem and independently of NESO's executive management. Where necessary, Ofgem may require further information, commission additional analysis, or conduct follow-up interviews with relevant operational personnel before reaching its conclusions.

Ofgem will use the analysis and assessment provided to review the securing of the system during the June heatwave. Our purpose is to establish what happened, understand the operational context and decision-making, identify lessons for the future and determine whether any regulatory issues arise. We will take account of relevant findings from the independent legal investigation where those findings are material to understanding the management of the event or any regulatory implications but will not duplicate the independent investigation into the specific whistleblowing allegations.

Transparency will be a central principle throughout and Ofgem's goal is for all reviews to publicly provide full and comprehensive answers. NESO's post-event analysis, and Ofgem's conclusions, will be published, subject only to limited redactions required to protect the anonymity of individual staff members, commercially sensitive information, matters of national security, or other legitimate confidentiality considerations.

Should either review identify issues warranting further regulatory scrutiny, Ofgem will consider what additional action is required and will utilise the full range of its regulatory powers where appropriate.

Our focus throughout will be to establish the facts, follow the evidence wherever it leads and act independently in the public interest. It is essential that the circumstances surrounding this event are fully understood, that any necessary action is taken, and that lessons are identified to strengthen the resilience, safety and effective operation of Great Britain's electricity system. We are committed to completing this work rigorously, transparently and at pace, while ensuring confidence in the integrity of both the process and its outcomes.

## Ofgem Formal Post Event Review request

**To: National Energy System Operators Limited**

**Request under Condition C7.5 (Energy resilience and resilience reporting) of the Electricity System Operator Licence to provide post-event analysis and assessment**

1. The company to which this request is addressed ("NESO") is the holder of an Electricity System Operator Licence ("ESO Licence") treated as granted under Section 6(1)(da) of the Electricity Act 1989 and a Gas System Planner Licence ("GSP

Licence”) granted under Section 7AA of the Gas Act 1986.

2. The Gas and Electricity Markets Authority (“the Authority”)<sup>1</sup> issues this request, under Condition C7.5 of the ESO Licence.
3. In late June, during a period of extreme weather, Great Britain’s power system experienced operability challenges and tight margins. This resulted in NESO issuing Electricity Margin Notices for the evening peak periods on 24 June and 26 June.
4. The Authority, pursuant to Condition C.7.5, hereby requests NESO to conduct a comprehensive review into all periods of significant system operation challenges during the week of 22 June. NESO must explore the drivers of system stresses, the actions taken by NESO and the market including decision making and record keeping, the precise security status of the system against relevant security standards, and any wider system operation lessons to be learned, both now and in the future.
5. The Authority, separate to this request, will work with NESO and DESNZ to set out and confirm the relevant actions to be completed for NESO to fulfil this request.

Eleanor Warburton

Director for Energy Systems Design & Development

Duly authorised on behalf of the Gas and Electricity Markets Authority

17 July 2026

## Documents



Regulatory review of the operation and management of the electricity system during the June heat event: terms of reference [PDF, 95.02KB]

<https://sites/default/files/2026-07/Terms-of-Reference-for-Review-of-Energy-System-Operation-During-Extreme-Heat-Event.pdf>

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21 July 2026 Terms of Reference document added.

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## APPENDIX F – INDEX OF DOCUMENTS

| Name                                      | Document Type                                                 | Document Date    |
|-------------------------------------------|---------------------------------------------------------------|------------------|
| <b>08 January 2025 Full Review_.pdf</b>   | Post-event review report (independent post-incident analysis) | January 8, 2025  |
| <b>08 January 2025 Summary Report.pdf</b> | Summary review report                                         | January 8, 2025  |
| <b>1A_220626_0200_FINAL_05.pdf</b>        | System Operating Plan                                         | June 22, 2026    |
| <b>1A_220626_0200_PRELIMINARY_01.pdf</b>  | System Operating Plan (day-ahead operating plan)              | June 22, 2026    |
| <b>1A_220626_0200_PRELIMINARY_02.pdf</b>  | System operating plan                                         | June 22, 2026    |
| <b>1A_220626_0200_PRELIMINARY_03.pdf</b>  | System Operating Plan (preliminary)                           | June 22, 2026    |
| <b>1A_220626_0200_REVISED_04.pdf</b>      | System operating plan                                         | June 22, 2026    |
| <b>1A_230626_0200_FINAL_04.pdf</b>        | System Operating Plan                                         | June 23, 2026    |
| <b>1A_230626_0200_PRELIMINARY_01.pdf</b>  | System operating plan                                         | June 23, 2026    |
| <b>1A_230626_0200_REVISED_02.pdf</b>      | System Operating Plan                                         | June 23, 2026    |
| <b>1A_230626_0200_REVISED_03.pdf</b>      | System operating plan                                         | June 23, 2026    |
| <b>1A_240626_0200_FINAL_02.pdf</b>        | System Operating Plan                                         | June 24, 2026    |
| <b>1A_240626_0200_REVISED_01.pdf</b>      | System Operating Plan                                         | June 24, 2026    |
| <b>1A_250626_0200_FINAL_03.pdf</b>        | System Operating Plan                                         | June 25, 2026    |
| <b>1A_250626_0200_PRELIMINARY_01.pdf</b>  | System Operating Plan (day-ahead operating plan)              | June 25, 2026    |
| <b>1A_250626_0200_REVISED_02.pdf</b>      | System Operating Plan                                         | June 25, 2026    |
| <b>1B_220626_0430_DAY_AHEAD_01.pdf</b>    | System Operating Plan (Day Ahead)                             | June 22, 2026    |
| <b>1B_220626_0430_DAY_AHEAD_02.pdf</b>    | System Operating Plan (day-ahead operating plan)              | June 22, 2026    |
| <b>1B_220626_0430_FINAL_06.pdf</b>        | System Operating Plan                                         | June 22, 2026    |
| <b>1B_220626_0430_PRELIMINARY_03.pdf</b>  | System operating plan                                         | June 22, 2026    |
| <b>1B_220626_0430_PRELIMINARY_04.pdf</b>  | System operating plan                                         | June 22, 2026    |
| <b>1B_220626_0430_REVISED_05.pdf</b>      | System operating plan                                         | June 22, 2026    |
| <b>1B_230626_0430_DAY_AHEAD_06.pdf</b>    | System Operating Plan (Day Ahead)                             | June 23, 2026    |
| <b>1B_230626_0430_PRELIMINARY_07.pdf</b>  | System operating plan                                         | June 23, 2026    |
| <b>1B_230626_0430_REVISED_08.pdf</b>      | System operating plan                                         | June 23, 2026    |
| <b>1B_230626_0430_REVISED_09.pdf</b>      | System operating plan                                         | June 23, 2026    |
| <b>1B_230626_0435_DAY_AHEAD_01.pdf</b>    | System Operating Plan (Day Ahead)                             | June 23, 2026    |
| <b>1B_230626_0435_DAY_AHEAD_02.pdf</b>    | System Operating Plan (day-ahead)                             | June 23, 2026    |
| <b>1B_230626_0435_DAY_AHEAD_03.pdf</b>    | Day-ahead system operating plan                               | June 22/23, 2026 |
| <b>1B_230626_0435_FINAL_11.pdf</b>        | System operating plan                                         | June 23, 2026    |

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| <b>1B_230626_0435_REVISIED_10.pdf</b>                      | System Operating Plan                                           | June 23, 2026    |
| <b>1B_240626_0425_FINAL_07.pdf</b>                         | System operating plan (operational planning report)             | June 24, 2026    |
| <b>1B_240626_0425_REVISIED_06.pdf</b>                      | System Operating Plan                                           | June 23/24, 2026 |
| <b>1B_240626_0430_DAY_AHEAD_01.pdf</b>                     | Day-ahead system operating plan                                 | June 24, 2026    |
| <b>1B_240626_0430_DAY_AHEAD_02.pdf</b>                     | Day-ahead System Operating Plan                                 | June 23/24, 2026 |
| <b>1B_240626_0430_PRELIMINARY_03.pdf</b>                   | System Operating Plan (preliminary)                             | June 24, 2026    |
| <b>1B_240626_0430_PRELIMINARY_04.pdf</b>                   | System Operating Plan                                           | June 24, 2026    |
| <b>1B_240626_0430_REVISIED_05.pdf</b>                      | System Operating Plan                                           | June 24, 2026    |
| <b>1B_250626_0430_DAY_AHEAD_01.pdf</b>                     | Day-ahead System Operating Plan                                 | June 25, 2026    |
| <b>1B_250626_0525_FINAL_06.pdf</b>                         | System Operating Plan                                           | June 25, 2026    |
| <b>1B_250626_0525_REVISIED_05.pdf</b>                      | System operating plan                                           | June 25, 2026    |
| <b>1B_250626_0530_REVISIED_03.pdf</b>                      | System Operating Plan                                           | June 25, 2026    |
| <b>1B_250626_0530_REVISIED_04.pdf</b>                      | System operating plan                                           | June 25, 2026    |
| <b>1B_250626_0535_PRELIMINARY_02.pdf</b>                   | System operating plan (preliminary)                             | June 24/25, 2026 |
| <b>20260622 Evening Shift OSM Handover.docx</b>            | Operational shift handover log (OSM handover document)          | June 22, 2026    |
| <b>20260622 Morning Shift OSM Handover.docx</b>            | Shift handover document (operational shift log)                 | June 22, 2026    |
| <b>20260622 Night Shift OSM Handover.docx</b>              | Night-to-morning operational shift handover (OSM shift log)     | June 22, 2026    |
| <b>20260623 Evening to Night Shift OSM Handover.docx</b>   | Shift handover / operational shift log                          | June 23, 2026    |
| <b>20260623 Morning to Evening Shift OSM Handover.docx</b> | Shift handover log / operational handover document              | June 23, 2026    |
| <b>20260623 Night to Morning Shift OSM Handover.docx</b>   | Operational night-to-morning shift handover                     | June 23, 2026    |
| <b>20260624 Evening Shift OSM Handover.docx</b>            | Shift handover document (OSM night-to-morning handover)         | June 24, 2026    |
| <b>20260624 Morning to Evening Shift OSM Handover.docx</b> | Shift handover log / operational situation report               | June 24, 2026    |
| <b>20260624 Night to Morning Shift OSM Handover.docx</b>   | Shift handover document (night-to-morning operational handover) | June 24, 2026    |
| <b>20260625 Evening to Night Shift OSM Handover.docx</b>   | Shift handover (evening-to-night operational handover)          | June 25, 2026    |
| <b>20260625 Morning to Evening Shift OSM Handover.docx</b> | Operational shift handover log (OSM night-to-morning handover)  | June 25, 2026    |
| <b>20260625 Night to Morning Shift OSM Handover.docx</b>   | Night-to-morning operational shift handover (shift log)         | June 25, 2026    |
| <b>20260626 E Shift OSM Handover.docx</b>                  | Shift handover document (operational situation report)          | June 26, 2026    |
| <b>20260626 Morning Shift OSM Handover.docx</b>            | Morning shift handover / operational shift log                  | June 26, 2026    |
| <b>20260626 Night Shift OSM Handover.docx</b>              | Shift handover document (operational night-shift log)           | June 26, 2026    |
| <b>20260626 Night to Morning Shift OSM Handover.docx</b>   | Shift handover report (operational handover log)                | June 26, 2026    |
| <b>20260627 Day Shift OSM Handover.docx</b>                | Shift log / day-shift handover                                  | June 27, 2026    |
| <b>20260627 Night Shift OSM Handover.docx</b>              | OSM shift handover report (operational situation report)        | June 27/28, 2026 |

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| <b>23rd June Frequecy report1.pdf</b>    | Frequency event report                              | June 23, 2026    |
| <b>2A_220626_0815_FINAL_10.pdf</b>       | System operating plan                               | June 22, 2026    |
| <b>2A_220626_0815_REVISIED_09.pdf</b>    | System Operating Plan (revised)                     | June 22, 2026    |
| <b>2A_220626_0830_DAY_AHEAD_01.pdf</b>   | Day-ahead System Operating Plan                     | June 22, 2026    |
| <b>2A_220626_0830_PRELIMINARY_02.pdf</b> | System Operating Plan                               | June 22, 2026    |
| <b>2A_220626_0830_PRELIMINARY_03.pdf</b> | System Operating Plan (day-ahead operating plan)    | June 21/22, 2026 |
| <b>2A_220626_0830_PRELIMINARY_05.pdf</b> | System Operating Plan                               | June 22, 2026    |
| <b>2A_220626_0830_PRELIMINARY_06.pdf</b> | System Operating Plan (preliminary)                 | June 22, 2026    |
| <b>2A_220626_0830_PRELIMINARY_08.pdf</b> | System operating plan (preliminary)                 | June 22, 2026    |
| <b>2A_230626_1000_DAY_AHEAD_01.pdf</b>   | Day-ahead System Operating Plan                     | June 23, 2026    |
| <b>2A_230626_1005_FINAL_02.pdf</b>       | System operating plan                               | June 23, 2026    |
| <b>2A_240626_1000_PRELIMINARY_01.pdf</b> | System Operating Plan                               | June 23/24, 2026 |
| <b>2A_240626_1000_REVISIED_02.pdf</b>    | System operating plan                               | June 24, 2026    |
| <b>2A_240626_1005_FINAL_03.pdf</b>       | System Operating Plan                               | June 24, 2026    |
| <b>2A_250626_0830_PRELIMINARY_01.pdf</b> | System Operating Plan (preliminary)                 | June 25, 2026    |
| <b>2A_250626_1005_REVISIED_02.pdf</b>    | System Operating Plan                               | June 25, 2026    |
| <b>2A_250626_1015_FINAL_03.pdf</b>       | System Operating Plan                               | June 25, 2026    |
| <b>2B_220626_1145_PRELIMINARY_02.pdf</b> | System Operating Plan (operational planning report) | June 22, 2026    |
| <b>2B_220626_1145_PRELIMINARY_03.pdf</b> | System Operating Plan                               | June 22, 2026    |
| <b>2B_220626_1230_PRELIMINARY_01.pdf</b> | System Operating Plan                               | June 22, 2026    |
| <b>2B_220626_1230_REVISIED_05.pdf</b>    | System operating plan                               | June 22, 2026    |
| <b>2B_220626_1300_FINAL_06.pdf</b>       | System operating plan                               | June 22, 2026    |
| <b>2B_230626_1230_FINAL_04.pdf</b>       | System Operating Plan (operational planning report) | June 23, 2026    |
| <b>2B_230626_1230_PRELIMINARY_01.pdf</b> | System Operating Plan (day-ahead operating plan)    | June 23, 2026    |
| <b>2B_230626_1230_REVISIED_02.pdf</b>    | System Operating Plan                               | June 23, 2026    |
| <b>2B_230626_1230_REVISIED_03.pdf</b>    | System Operating Plan                               | June 23, 2026    |
| <b>2B_240626_1205_FINAL_03.pdf</b>       | System Operating Plan                               | June 24, 2026    |
| <b>2B_240626_1205_REVISIED_02.pdf</b>    | System operating plan                               | June 24, 2026    |
| <b>2B_240626_1230_PRELIMINARY_01.pdf</b> | System operating plan                               | June 24, 2026    |
| <b>2B_250626_1225_FINAL_05.pdf</b>       | System Operating Plan                               | June 25, 2026    |
| <b>2B_250626_1225_REVISIED_02.pdf</b>    | System operating plan                               | June 25, 2026    |
| <b>2B_250626_1225_REVISIED_03.pdf</b>    | System operating plan                               | June 25, 2026    |
| <b>2B_250626_1225_REVISIED_04.pdf</b>    | System operating plan                               | June 25, 2026    |
| <b>2B_250626_1230_PRELIMINARY_01.pdf</b> | System Operating Plan (day-ahead operating plan)    | June 25, 2026    |

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| <b>2F_220626_0725_PRELIMINARY_02.pdf</b> | System operating plan (preliminary)                             | June 22, 2026    |
| <b>2F_220626_0725_PRELIMINARY_03.pdf</b> | System Operating Plan (preliminary)                             | June 22, 2026    |
| <b>2F_230626_0800_DAY_AHEAD_01.pdf</b>   | System operating plan — day-ahead                               | June 22/23, 2026 |
| <b>2F_230626_0800_PRELIMINARY_02.pdf</b> | System Operating Plan (preliminary)                             | June 23, 2026    |
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| <b>2F_230626_0800_REVISED_04.pdf</b>     | System operating plan                                           | June 23, 2026    |
| <b>2F_230626_0805_FINAL_05.pdf</b>       | System Operating Plan                                           | June 23, 2026    |
| <b>2F_240626_0800_DAY_AHEAD_01.pdf</b>   | System operating plan                                           | June 24, 2026    |
| <b>2F_240626_0800_PRELIMINARY_02.pdf</b> | System operating plan                                           | June 24, 2026    |
| <b>2F_240626_0800_PRELIMINARY_03.pdf</b> | System Operating Plan (preliminary operational planning report) | June 24, 2026    |
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| <b>2F_240626_0805_REVISED_04.pdf</b>     | System operating plan                                           | June 24, 2026    |
| <b>2F_240626_0805_REVISED_05.pdf</b>     | System Operating Plan                                           | June 24, 2026    |
| <b>2F_250626_0800_DAY_AHEAD_01.pdf</b>   | System operating plan                                           | June 25, 2026    |
| <b>2F_250626_0800_PRELIMINARY_02.pdf</b> | System operating plan (day-ahead)                               | June 25, 2026    |
| <b>2F_250626_0800_PRELIMINARY_03.pdf</b> | System Operating Plan (preliminary)                             | June 25, 2026    |
| <b>2F_250626_0810_FINAL_06.pdf</b>       | System operating plan                                           | June 25, 2026    |
| <b>2F_250626_0815_REVISED_04.pdf</b>     | System Operating Plan (operational planning report)             | June 25, 2026    |
| <b>2F_250626_0815_REVISED_05.pdf</b>     | System operating plan                                           | June 25, 2026    |
| <b>3B_220626_1345_PRELIMINARY_01.pdf</b> | System Operating Plan (preliminary)                             | June 22, 2026    |
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| <b>3B_230626_1410_PRELIMINARY_01.pdf</b> | System Operating Plan                                           | June 23, 2026    |
| <b>3B_230626_1410_PRELIMINARY_02.pdf</b> | System operating plan (preliminary)                             | June 23, 2026    |
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| <b>3B_230626_1420_FINAL_04.pdf</b>       | System Operating Plan (final operational planning report)       | June 23, 2026    |
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| <b>3B_240626_1410_PRELIMINARY_01.pdf</b> | System Operating Plan (preliminary)                             | June 24, 2026    |
| <b>3B_240626_1410_PRELIMINARY_02.pdf</b> | System Operating Plan (preliminary)                             | June 24, 2026    |
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| <b>3B_250626_1440_DAY_AHEAD_02.pdf</b>   | System Operating Plan (day-ahead)   | June 25, 2026 |
| <b>3B_250626_1440_PRELIMINARY_03.pdf</b> | System operating plan               | June 25, 2026 |
| <b>3B_250626_1440_PRELIMINARY_04.pdf</b> | System operating plan               | June 25, 2026 |
| <b>3C_220626_1950_FINAL_12.pdf</b>       | System operating plan               | June 22, 2026 |
| <b>3C_220626_2015_FINAL_10.pdf</b>       | System operating plan               | June 22, 2026 |
| <b>3C_220626_2015_FINAL_11.pdf</b>       | System Operating Plan               | June 22, 2026 |
| <b>3C_220626_2015_PRELIMINARY_02.pdf</b> | System Operating Plan               | June 22, 2026 |
| <b>3C_220626_2015_PRELIMINARY_03.pdf</b> | System operating plan               | June 22, 2026 |
| <b>3C_220626_2015_PRELIMINARY_04.pdf</b> | System operating plan               | June 22, 2026 |
| <b>3C_220626_2015_PRELIMINARY_05.pdf</b> | System operating plan               | June 22, 2026 |
| <b>3C_220626_2015_PRELIMINARY_06.pdf</b> | Preliminary System Operating Plan   | June 22, 2026 |
| <b>3C_220626_2015_PRELIMINARY_08.pdf</b> | System Operating Plan (preliminary) | June 22, 2026 |
| <b>3C_220626_2015_PRELIMINARY_09.pdf</b> | System Operating Plan (preliminary) | June 22, 2026 |
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| <b>3C_230626_1920_REVISED_11.pdf</b>     | System Operating Plan               | June 23, 2026 |
| <b>3C_230626_1950_DAY_AHEAD_01.pdf</b>   | System Operating Plan (Day Ahead)   | June 23, 2026 |
| <b>3C_230626_1955_DAY_AHEAD_02.pdf</b>   | Day-ahead System Operating Plan     | June 23, 2026 |
| <b>3C_230626_1955_DAY_AHEAD_03.pdf</b>   | Day-ahead System Operating Plan     | June 23, 2026 |
| <b>3C_230626_1955_DAY_AHEAD_04.pdf</b>   | System operating plan (day-ahead)   | June 23, 2026 |
| <b>3C_230626_1955_PRELIMINARY_05.pdf</b> | System Operating Plan (preliminary) | June 23, 2026 |
| <b>3C_230626_1955_PRELIMINARY_06.pdf</b> | System Operating Plan (preliminary) | June 23, 2026 |
| <b>3C_230626_1955_PRELIMINARY_07.pdf</b> | System operating plan (preliminary) | June 23, 2026 |
| <b>3C_230626_1955_PRELIMINARY_08.pdf</b> | Preliminary system operating plan   | June 23, 2026 |
| <b>3C_230626_1955_PRELIMINARY_09.pdf</b> | System operating plan               | June 23, 2026 |
| <b>3C_230626_1955_PRELIMINARY_10.pdf</b> | System operating plan               | June 23, 2026 |
| <b>3C_240626_1955_DAY_AHEAD_01.pdf</b>   | Day-ahead System Operating Plan     | June 24, 2026 |
| <b>3C_240626_1955_DAY_AHEAD_02.pdf</b>   | System Operating Plan (Day Ahead)   | June 24, 2026 |
| <b>3C_240626_1955_DAY_AHEAD_03.pdf</b>   | Day-ahead system operating plan     | June 24, 2026 |
| <b>3C_240626_1955_FINAL_15.pdf</b>       | System Operating Plan               | June 24, 2026 |
| <b>3C_240626_1955_PRELIMINARY_04.pdf</b> | System operating plan               | June 24, 2026 |
| <b>3C_240626_1955_PRELIMINARY_05.pdf</b> | System operating plan               | June 24, 2026 |
| <b>3C_240626_1955_PRELIMINARY_06.pdf</b> | System operating plan               | June 24, 2026 |

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| <b>3C_240626_1955_PRELIMINARY_07.pdf</b> | Preliminary system operating plan                               | June 24, 2026 |
| <b>3C_240626_1955_PRELIMINARY_08.pdf</b> | System Operating Plan                                           | June 24, 2026 |
| <b>3C_240626_1955_PRELIMINARY_09.pdf</b> | System operating plan                                           | June 24, 2026 |
| <b>3C_240626_1955_PRELIMINARY_10.pdf</b> | System operating plan                                           | June 24, 2026 |
| <b>3C_240626_1955_PRELIMINARY_11.pdf</b> | System Operating Plan                                           | June 26, 2024 |
| <b>3C_240626_1955_REVISED_12.pdf</b>     | System Operating Plan                                           | June 24, 2026 |
| <b>3C_240626_1955_REVISED_13.pdf</b>     | System Operating Plan                                           | June 24, 2026 |
| <b>3C_240626_1955_REVISED_14.pdf</b>     | System Operating Plan                                           | June 24, 2026 |
| <b>3C_250626_1825_DAY_AHEAD_01.pdf</b>   | Day-ahead System Operating Plan                                 | June 25, 2026 |
| <b>3C_250626_1825_DAY_AHEAD_02.pdf</b>   | System Operating Plan (day-ahead operational planning document) | June 25, 2026 |
| <b>3C_250626_1945_DAY_AHEAD_03.pdf</b>   | Day-ahead System Operating Plan                                 | June 25, 2026 |
| <b>3C_250626_1945_DAY_AHEAD_04.pdf</b>   | Day-ahead System Operating Plan                                 | June 25, 2026 |
| <b>3C_250626_2020_FINAL_08.pdf</b>       | System operating plan                                           | June 25, 2026 |
| <b>3C_250626_2020_PRELIMINARY_05.pdf</b> | System operating plan                                           | June 25, 2026 |
| <b>3C_250626_2020_PRELIMINARY_06.pdf</b> | Preliminary System Operating Plan                               | June 25, 2026 |
| <b>3C_250626_2020_REVISED_07.pdf</b>     | System operating plan                                           | June 25, 2026 |
| <b>4B_220626_2050_DAY_AHEAD_01.pdf</b>   | System Operating Plan — Day Ahead                               | June 22, 2026 |
| <b>4B_220626_2050_DAY_AHEAD_02.pdf</b>   | System operating plan (day-ahead)                               | June 22, 2026 |
| <b>4B_220626_2050_PRELIMINARY_03.pdf</b> | System operating plan                                           | June 22, 2026 |
| <b>4B_220626_2050_PRELIMINARY_04.pdf</b> | System Operating Plan                                           | June 22, 2026 |
| <b>4B_220626_2115_PRELIMINARY_06.pdf</b> | System Operating Plan                                           | June 22, 2026 |
| <b>4B_220626_2115_PRELIMINARY_07.pdf</b> | System Operating Plan (preliminary)                             | June 22, 2026 |
| <b>4B_220626_2115_PRELIMINARY_08.pdf</b> | System operating plan (preliminary)                             | June 22, 2026 |
| <b>4B_220626_2130_FINAL_09.pdf</b>       | System Operating Plan                                           | June 22, 2026 |
| <b>4B_220626_2130_FINAL_10.pdf</b>       | System Operating Plan                                           | June 22, 2026 |
| <b>4B_230626_2100_DAY_AHEAD_01.pdf</b>   | System Operating Plan (day-ahead operating plan)                | June 23, 2026 |
| <b>4B_230626_2100_FINAL_05.pdf</b>       | System Operating Plan                                           | June 23, 2026 |
| <b>4B_230626_2100_PRELIMINARY_02.pdf</b> | System operating plan (preliminary)                             | June 23, 2026 |
| <b>4B_230626_2100_PRELIMINARY_03.pdf</b> | System operating plan                                           | June 23, 2026 |
| <b>4B_230626_2100_REVISED_04.pdf</b>     | System Operating Plan                                           | June 23, 2026 |
| <b>4B_240626_2100_PRELIMINARY_01.pdf</b> | System operating plan (day-ahead)                               | June 24, 2026 |
| <b>4B_240626_2100_REVISED_02.pdf</b>     | System operating plan                                           | June 24, 2026 |
| <b>4B_240626_2210_FINAL_03.pdf</b>       | System Operating Plan                                           | June 24, 2026 |

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| <b>4B_240626_2210_FINAL_04.pdf</b>                                                     | System operating plan                                                                   | June 24, 2026     |
| <b>4B_250626_2115_DAY_AHEAD_01.pdf</b>                                                 | System Operating Plan (day-ahead operational plan)                                      | June 25, 2026     |
| <b>4B_250626_2115_DAY_AHEAD_02.pdf</b>                                                 | System Operating Plan (day-ahead operational plan)                                      | June 25, 2026     |
| <b>4B_250626_2115_DAY_AHEAD_03.pdf</b>                                                 | System operating plan (day-ahead)                                                       | June 25, 2026     |
| <b>4B_250626_2115_DAY_AHEAD_04.pdf</b>                                                 | Day-ahead System Operating Plan                                                         | June 25, 2026     |
| <b>4B_250626_2115_DAY_AHEAD_05.pdf</b>                                                 | System Operating Plan (day-ahead operating plan)                                        | June 25, 2026     |
| <b>4B_250626_2115_DAY_AHEAD_06.pdf</b>                                                 | Day-ahead System Operating Plan                                                         | June 25, 2026     |
| <b>4B_250626_2115_PRELIMINARY_07.pdf</b>                                               | System Operating Plan                                                                   | June 25, 2026     |
| <b>4B_250626_2115_PRELIMINARY_08.pdf</b>                                               | System Operating Plan                                                                   | June 25, 2026     |
| <b>4B_250626_2120_FINAL_12.pdf</b>                                                     | System Operating Plan                                                                   | June 25, 2026     |
| <b>4B_250626_2120_PRELIMINARY_09.pdf</b>                                               | System Operating Plan                                                                   | June 25, 2026     |
| <b>4B_250626_2120_REVISED_10.pdf</b>                                                   | System Operating Plan                                                                   | June 25, 2026     |
| <b>4B_250626_2120_REVISED_11.pdf</b>                                                   | System Operating Plan                                                                   | June 25, 2026     |
| <b>Band D Media Manager August 21.pdf</b>                                              | Job description (role profile)                                                          | August 2021       |
| <b>BP0711 - Record Retention.pdf</b>                                                   | Record retention business procedure                                                     | February 13, 2026 |
| <b>BP0712 - Record Storage.pdf</b>                                                     | Record Storage business procedure                                                       | February 13, 2026 |
| <b>BP0713 - Record Ownership.pdf</b>                                                   | Record Ownership business procedure                                                     | February 13, 2026 |
| <b>BP0714 - Record Indexing.pdf</b>                                                    | Business procedure — Record Indexing                                                    | February 13, 2026 |
| <b>BP0715 - Record Retrieval.pdf</b>                                                   | Record retrieval business procedure                                                     | February 13, 2026 |
| <b>BP0716 - Record Disposal.pdf</b>                                                    | NESO Business Procedure — Record Disposal                                               | February 13, 2026 |
| <b>BP1023 - NESO Management Reporting, Investigation and Action Tracking.pdf</b>       | NESO business procedure — management reporting, investigation and action tracking.      | July 16, 2025     |
| <b>BP1210 - Logging Bid Offer Acceptances &amp; Ancillary Service Instructions.pdf</b> | NESO Business Procedure                                                                 | January 24, 2026  |
| <b>BP1260E - Energy Balancing Best Practice.pdf</b>                                    | NESO Business Procedure — Energy Balancing Best Practice (procedural guidance document) | April 30, 2026    |
| <b>BP1260S - Strategy Best Practice.pdf</b>                                            | Strategy best-practice business procedure (operational guidance manual)                 | March 30, 2026    |
| <b>BP1260T - Transmission Security Best Practice.pdf</b>                               | Transmission security business procedure and best-practice guidance document            | May 1, 2026       |
| <b>BP1521 - Power System Risk Management.pdf</b>                                       | NESO Business Procedure — Power System Risk Management                                  | February 15, 2026 |
| <b>BP1523 - Training and Authorisation of Staff at the ENCC.pdf</b>                    | Business procedure                                                                      | March 10, 2026    |
| <b>BP1700 - Operational Logging on the ENCC Transmission Desks.pdf</b>                 | Operational procedure — NESO Business Procedure for ENCC transmission-desk logging      | May 23, 2025      |

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| <b>C1 Access Report(256129108.1).csv</b>                                  | Access-control event log (access report/timeline)                                      | June 22-26, 2026   |
| <b>C1 Access Report.csv</b>                                               | Access-event log / access report (chronological timeline)                              | June 22-26, 2027   |
| <b>C2 Access Report(256129181.1).csv</b>                                  | Access-control event log / access timeline report                                      | June 22-26, 2028   |
| <b>C2 Access Report.csv</b>                                               | Access-control event log / chronological event timeline                                |                    |
| <b>Control Room Audit Box Logs 22-Jun-2026.pdf</b>                        | Control-room operational shift log<br>(communication/decision and zonal-balancing log) | June 22, 2026      |
| <b>Control Room Audit Box Logs 23-Jun-2026.pdf</b>                        | Control-room operational shift log<br>(communication/decision and zonal-balancing log) | June 23, 2026      |
| <b>Control Room Audit Box Logs 24-Jun-2026 prt 1.pdf</b>                  | Control-room operational shift log<br>(communication/decision and zonal-balancing log) | June 24, 2026      |
| <b>Control Room Audit Box Logs 24-Jun-2026 prt 2.pdf</b>                  | Control-room operational shift log<br>(communication/decision and zonal-balancing log) | June 24, 2026      |
| <b>Control Room Audit Box Logs 25-Jun-2026.pdf</b>                        | Control-room operational shift log<br>(communication/decision and zonal-balancing log) | June 25, 2026      |
| <b>Control Room Audit Box Logs 26-Jun-2026.pdf</b>                        | Shift log — control-room operational communications<br>and decisions log               | June 26, 2026      |
| <b>Control Room Transmission Logs 22-26-Jun-2026.pdf</b>                  | Control room transmission log (shift log)                                              | June 22-26, 2026   |
| <b>Corporate Affairs Intranet.pdf</b>                                     | Corporate Affairs intranet overview page                                               | March 2026         |
| <b>Crisis Communications Manual.pdf</b>                                   | Crisis communications manual / plan                                                    | 2025               |
| <b>Emergency Response Operations Manager - JD.pdf</b>                     | Job description                                                                        |                    |
| <b>EMN article iterations 1.pdf</b>                                       | Internal intranet article — operational system<br>notice/update                        | June 24, 2026      |
| <b>EMN intranet.pdf</b>                                                   | System warning — Electricity Margin Notice (EMN)                                       | June 24 & 26, 2026 |
| <b>EMN_BST26_V7.7_20260624 V2.xlsm</b>                                    | Electricity-system operational dispatch/situation report                               | June 24, 2026      |
| <b>EMN_BST26_V7.7_20260624.xlsm</b>                                       | Situation report (electricity-system operational snapshot)                             | June 24, 2026      |
| <b>EMN_BST26_V7.7_20260626_3C V18 PSM comments.xlsm</b>                   | Situation report (operational system-status snapshot)                                  | June 26, 2026      |
| <b>ENCC Organogram.pdf</b>                                                | Organisational chart (organogram; people view)                                         |                    |
| <b>ENCC Shift Cover wc 22-06-26.xlsx</b>                                  | Shift cover schedule (shift rota)                                                      | June 22-26, 2026   |
| <b>ENCCStatusReport_22-06-26_05-45-55 - STRICTLY<br/>CONFIDENTIAL.pdf</b> | Situation report — ENCC Status Report                                                  | June 22, 2026      |
| <b>ENCCStatusReport_23-06-26_06-28-52 - STRICTLY<br/>CONFIDENTIAL.pdf</b> | Situation report — ENCC Status Report                                                  | June 23, 2026      |
| <b>ENCCStatusReport_24-06-26_06-37-30 - STRICTLY<br/>CONFIDENTIAL.pdf</b> | Situation report — ENCC Status Report                                                  | June 24, 2026      |
| <b>ENCCStatusReport_25-06-26_06-34-35 - STRICTLY<br/>CONFIDENTIAL.pdf</b> | Situation report — ENCC Status Report                                                  | June 25, 2026      |
| <b>ENCCStatusReport_26-06-26_06-50-29 - STRICTLY<br/>CONFIDENTIAL.pdf</b> | Situation report — ENCC Status Report                                                  | June 26, 2026      |

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| <b>FIX_220626_0625_FINAL_02.pdf</b>                                                       | System Operating Plan                                 | June 22, 2026      |
| <b>FIX_220626_0625_REVISIED_01.pdf</b>                                                    | System Operating Plan                                 | June 22, 2026      |
| <b>FIX_220626_1025_FINAL_02.pdf</b>                                                       | System Operating Plan                                 | June 22, 2026      |
| <b>FIX_220626_1025_REVISIED_01.pdf</b>                                                    | System Operating Plan                                 | June 22, 2026      |
| <b>FIX_220626_2310_FINAL_03.pdf</b>                                                       | System operating plan                                 | June 22, 2026      |
| <b>FIX_220626_2310_REVISIED_02.pdf</b>                                                    | System Operating Plan                                 | June 22, 2026      |
| <b>FIX_220626_2325_PRELIMINARY_01.pdf</b>                                                 | System Operating Plan (preliminary)                   | June 22, 2026      |
| <b>FIX_230626_0650_FINAL_03.pdf</b>                                                       | System Operating Plan                                 | June 23, 2026      |
| <b>FIX_230626_0650_PRELIMINARY_01.pdf</b>                                                 | System Operating Plan (preliminary)                   | June 23, 2026      |
| <b>FIX_230626_0650_REVISIED_02.pdf</b>                                                    | System operating plan                                 | June 23, 2026      |
| <b>FIX_230626_1830_FINAL_01.pdf</b>                                                       | System Operating Plan                                 | June 23, 2026      |
| <b>FIX_230626_2325_FINAL_04.pdf</b>                                                       | System operating plan                                 | June 23, 2026      |
| <b>FIX_230626_2325_PRELIMINARY_01.pdf</b>                                                 | System operating plan                                 | June 23, 2026      |
| <b>FIX_230626_2325_REVISIED_02.pdf</b>                                                    | System operating plan                                 | June 23, 2026      |
| <b>FIX_230626_2325_REVISIED_03.pdf</b>                                                    | System operating plan                                 | June 23, 2026      |
| <b>FIX_240626_0645_FINAL_01.pdf</b>                                                       | System operating plan                                 | June 24, 2026      |
| <b>FIX_240626_1810_REVISIED_01.pdf</b>                                                    | System Operating Plan                                 | June 24, 2026      |
| <b>FIX_240626_2325_FINAL_01.pdf</b>                                                       | System Operating Plan                                 | June 24, 2026      |
| <b>FIX_250626_0625_FINAL_02.pdf</b>                                                       | System operating plan                                 | June 25, 2026      |
| <b>FIX_250626_0625_PRELIMINARY_01.pdf</b>                                                 | System operating plan (preliminary)                   | June 25, 2026      |
| <b>FIX_250626_2325_FINAL_01.pdf</b>                                                       | System Operating Plan                                 | June 25, 2026      |
| <b>Frequency Event Report - F00266 - Unexpected Demand pickup 25th June 2026 10pm.pdf</b> | Frequency event report                                | June 25/26, 2026   |
| <b>Frequency Event Report - F00267 - Transient Fault</b>                                  | Frequency event report                                | June 26, 2026      |
| <b>FW_ ACTION required_ Copy of Whistleblowing Policy and related documents.msg</b>       | Whistleblowing (Speak Up) policy document             | September 21, 2025 |
| <b>FW_ ACTION required_ Request for copies of FOIA and Privacy Policies.msg</b>           | Email correspondence, with an attached FOI/EIR policy | July 20, 2026      |
| <b>Head of Corporate Communications JD.pdf</b>                                            | Job description                                       |                    |
| <b>Head of Media and Issues Management.pdf</b>                                            | Job description                                       |                    |
| <b>Head of Power System JD.pdf</b>                                                        | Job description                                       |                    |
| <b>List of Communications updated.pdf</b>                                                 | Internal communications log                           | various            |
| <b>List of Communications- DO NOT USE.pdf</b>                                             | Confidential internal communications pack             | various            |
| <b>NESO 4.pdf</b>                                                                         | Crisis communications manual / plan                   | 2025               |
| <b>NESO 6.pdf</b>                                                                         | Corporate Affairs function description                | March 2026         |

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| <b>NESO Records Management Standard.pdf</b>                                              | Records management standard (organisational policy document)          | February 21, 2026  |
| <b>OEM 20260622.xlsm</b>                                                                 | Operational Energy Manager's Report                                   | June 22, 2026      |
| <b>OEM 20260623.xlsm</b>                                                                 | Operational Energy Manager's 24-hour situation report / shift log     | June 23, 2026      |
| <b>OEM 20260624.xlsm</b>                                                                 | Operational Energy Manager's 24-hour situation report / shift log     | June 24, 2026      |
| <b>OEM 20260625.xlsm</b>                                                                 | Operational Energy Manager's shift/situation report                   | June 25, 2026      |
| <b>OEM 20260626.xlsm</b>                                                                 | Operational Energy Manager's 24-hour operational report (OEM report)  | June 26, 2026      |
| <b>OEM 20260627.xlsm</b>                                                                 | Operational Energy Manager's 24-hour situation report and shift log   | June 27, 2026      |
| <b>Operational Manager JD.pdf</b>                                                        | Job description / job specification for an Operational Manager        | September 2025     |
| <b>OSM_20260622.docx</b>                                                                 | Daily operational strategy manager's shift report                     | June 22, 2026      |
| <b>OSM_20260623.docx</b>                                                                 | Operational Strategy Manager's daily management report (shift log)    | June 23, 2026      |
| <b>OSM_20260624.docx</b>                                                                 | Daily operational strategy manager's management report (shift log)    | June 24, 2026      |
| <b>OSM_20260625.docx</b>                                                                 | Shift log (daily operational management report)                       | June 25, 2026      |
| <b>OSM_20260626.docx</b>                                                                 | Shift log (daily operational management report)                       | June 26, 2026      |
| <b>OSM_20260627.docx</b>                                                                 | Daily operational situation report (OSM Report)                       | June 27, 2026      |
| <b>P0008 - Speak Up Policy.pdf</b>                                                       | Policy document — Speak Up Policy                                     | September 19, 2025 |
| <b>P0043 - NESO Information Rights (FOI EIR) Policy.pdf</b>                              | Policy — NESO Information Rights (FOI & EIR) Policy                   | January 12, 2026   |
| <b>Power System Engineer L8 JD.pdf</b>                                                   | Job description / job specification                                   |                    |
| <b>Power System Engineer Level 7 JD.pdf</b>                                              | Job description / job specification                                   | July 2026          |
| <b>PSM mobile phone logs(256129206.2).xlsx</b>                                           | Mobile phone communications log (call/SMS activity timeline)          | June 22-26, 2026   |
| <b>PSM mobile phone logs.xlsx</b>                                                        | Mobile phone communications log (chronological call and SMS timeline) | June 22-26, 2027   |
| <b>PSM's Log WC 22-June-2026 - open.docx</b>                                             | Shift handover log                                                    | June 22, 2026      |
| <b>RAPID.docx</b>                                                                        | Internal decision and recommendation paper (RAPID)                    | June 17, 2026      |
| <b>RE NESO Silver SitRep 001 - Margin Shortfall Evening Peak 2406.msg</b>                | Situation report                                                      | June 24, 2026      |
| <b>Security Logs information.docx</b>                                                    | System security log / situation report                                | June 23, 2026      |
| <b>SIR 062-26 (G) ESF Request to NESO</b>                                                | Significant incident report request                                   | June 26, 2026      |
| <b>SIR 062-26 (G) NESO Response to EdF</b>                                               | Significant incident report (response)                                | June 26, 2026      |
| <b>Strictly Confidential - NESO Situation Report - Margin Shortfall 260626 - 001.pdf</b> | Significant Event Report (NESO situation report)                      | June 26, 2026      |

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| <b>Strictly Confidential - NESO Situation Report - Margin Shortfall 260626 - 002.pdf</b>                    | Situation report (NESO Significant Event Report)                     | June 23/24. 2026               |
| <b>Strictly Confidential - NESO Situation Report Margin Shortfall 240626 - 002.pdf</b>                      | Situation report (NESO Bronze SITREP)                                | June 24, 2026                  |
| <b>Strictly Confidential - NESO Situation Report Margin Shortfall Evening Peak 2406 - 001 - Revised.pdf</b> | Situation report (NESO Bronze SITREP)                                | June 24, 2026                  |
| <b>Strictly Confidential - NESO Situation Report Margin Shortfall Evening Peak 2406 - 001.pdf</b>           | NESO Bronze Situation Report (SITREP 001)                            | June 24, 2026                  |
| <b>SystemWarnings-2026-06-22T12_00_00.000Z-2026-06-27T12_00_00.000Z-2.xlsx</b>                              | System warning log/register                                          | June 22-26, 2026               |
| <b>SystemWarnings-2026-06-22T12_00_00.000Z-2026-06-27T12_00_00.000Z.xlsx</b>                                | System warning log                                                   | June 22-26, 2026               |
| <b>Thermal Security Log WC 20260622.xlsx</b>                                                                | Thermal security log (daily operational monitoring log)              | June 22, 2026                  |
| <b>Timeline EMN Silver Activity 24 and 26 June 2026.pdf</b>                                                 | Timeline                                                             | June 24, 2026<br>June 26, 2026 |
| <b>TSE Scot_202608021328.pdf</b>                                                                            | Shift log (Control Engineer duty log)                                | June 23, 2026                  |
| <b>TSM 22 June 2026.docx</b>                                                                                | Transmission Security Manager's daily operational report (shift log) | June 22, 2026                  |
| <b>TSM 23 June 2026.docx</b>                                                                                | Transmission Security Manager's daily operational report (shift log) | June 23, 2026                  |
| <b>TSM 24 June 2026.docx</b>                                                                                | Transmission Security Manager's daily operational report (shift log) | June 24, 2026                  |
| <b>TSM 25 June 2026.docx</b>                                                                                | Transmission Security Manager's daily operational report (shift log) | June 25, 2026                  |
| <b>TSM 26 June 2026.docx</b>                                                                                | Transmission Security Manager's daily operational report (shift log) | June 26, 2026                  |
| <b>TSM 27 June 2026.docx</b>                                                                                | Transmission Security Manager's daily operational report (shift log) | June 27, 2026                  |

## APPENDIX - REPORT SUBMISSION AND PUBLICATION

### Report Submission and Publication

- ESI submitted its final report to the Panel on Monday, 12 October 2026, who in turn provided this to the NESO Board on Tuesday, 13 October 2026.
- The NESO Board met on Thursday, 15 October 2026 and considered the report and accepted it in full, including its findings and recommendations.
- The NESO Board determined that in the interests of transparency the report should be published in full, save only for any redactions / amendments required to ensure the confidentiality of the interviews and protect the identity of colleagues (as set out in the ToR), and that any such redactions / amendments should not alter the substance, findings or conclusions of the report.
- ESI determined that in two cases specific quotes from individuals should be paraphrased instead of being included verbatim. This was in paragraphs 5.19 and 5.26. This did not alter the substance of those paragraphs. In paragraph 5.7 an incorrect reference was corrected. No other changes were made. No findings, conclusions or recommendations were altered in any way.
- Given that the changes to the publication version of the report provided by ESI were very minimal, and that they were necessary to protect the identity of individuals, it was determined that this version of the report should be published in full.



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