

Public

Ref: FOI/25/062

National Energy System Operator

Faraday House

Gallows Hill

Warwick

CV34 6DA

InformationRights@neso.energy

www.neso.energy

11 August 2025

Dear requester

Request for Information

Thank you for your request for information which we received on 18 June 2025 and which you clarified on 27 June 2025. Following our initial response of 31 July 2025, we are now able to respond to the remainder of your request. We have included the full text of our earlier response with this letter.

Your request has been considered under the Environmental Information Regulations 2004 (EIR). This is because the information requested relates to NESO's ambitions for zero carbon operation (ZCO), a measure that could affect the environment, and therefore meets the definition of 'environmental information' at Regulation 2(1)(c) of the EIR.

Request

You asked us:

I would like to make a request regarding preparations to operate the grid without gas for an initial half-hour sometime within the year. Please share:

- a) relevant high-level advice passed to the Board of ExCo*
- b) assessment of risks, impacts and mitigations which pertain to the management of the grid, including with regard to dynamic voltage capacity, inertia, frequency*
- c) the thresholds which would require the "emergency" use of gas*

On 23 June 2025 we asked you to clarify, in relation to question a), whether your request was for 'relevant high-level advice' passed to the Board and / or to the Executive Committee (or to the

wider ELT) and provided links to information about the NESO Board and Executive Leadership Team (Executive Committee (ExCo) and Operations Committee(OpCo)).

You confirmed that your request related to advice '*passed to the Board or ExCo*'.

Our response

We do not hold recorded information in scope of question a).

'High level advice' specifically relating to preparations to operate the grid without gas for half an hour in 2025 has not been passed to NESO's Board or Executive Committee.

The Executive Committee sets the direction for the organisation, allocates resources and tracks performance. Performance is tracked through project delivery updates (e.g., on progress towards zero carbon operation).

NESO's Board are responsible for shaping NESO's strategy in line with our purpose and making sure we have the resources, risk approach, controls, and governance we need to deliver it.

Our plans to achieve zero carbon operation have been developed, discussed and iterated since the establishment of the Electricity System Operator in 2019. Formal analysis is captured through the [Operability Strategy Report](#), most recently published in March 2025.

Regulation 12(4)(a) of the EIR states "*A public authority may refuse to disclose information to the extent that it does not hold that information when an applicant's request is received.*" All EIR exceptions are subject to public interest test (PIT), however the Information Commissioner's Office (ICO) recognises that it is not possible to carry out a meaningful PIT where information is not held.

This concludes our response to your request.

Next steps

If you are dissatisfied with our handling of your request, you can ask us to review our response. If you want us to carry out a review, please let us know within 40 working days and quote the reference number at the top of this letter. You can find our procedure here: [Freedom of Information and Environmental Information Regulations | National Energy System Operator](#). The ICO's website also provides guidance on the internal review process: [What to do if you are dissatisfied with the response | ICO](#).

If you are still dissatisfied after our internal review, you can complain to the Information Commissioner's Office (ICO). You should make complaints to the ICO within six weeks of receiving the outcome of an internal review. The easiest way to lodge a complaint is through their website: www.ico.org.uk/foicomplaints. Alternatively, they can be contacted at: Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

Thank you for your interest in the work of the National Energy System Operator (NESO).

Regards,

The Information Rights Team, National Energy System Operator (NESO)

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31 July 2025

Dear requester

Request for Information

Thank you for your request for information which we received on 18 June 2025 and which you clarified on 27 June 2025. As we explained by email on 23 July 2025, we have unfortunately been unable to provide a complete response to your request by the statutory deadline. We have provided below some information in response to part of your request and will respond to the remainder of your request as soon as possible, in any event on or before Monday 11 August. Please be assured that the Information Rights Team is prioritising your request and we will come back to you as quickly as we can with the remainder of our response.

Your request has been considered under the Environmental Information Regulations 2004 (EIR). This is because the information requested relates to NESO's ambitions for zero carbon operation (ZCO), a measure that could affect the environment, and therefore meets the definition of 'environmental information' at Regulation 2(1)(c) of the EIR.

Request

You asked us:

I would like to make a request regarding preparations to operate the grid without gas for an initial half-hour sometime within the year. Please share:

a) relevant high-level advice passed to the Board or ExCo

b) assessment of risks, impacts and mitigations which pertain to the management of the grid, including with regard to dynamic voltage capacity, inertia, frequency

c) the thresholds which would require the "emergency" use of gas

Information on the zero-carbon operation (ZCO) ambition.

In 2019 we, as the National Grid Electricity System Operator (NG ESO), set out our ambition to be capable of operating the GB electricity transmission system using 100% zero carbon power generation, when the market delivers a zero-carbon power mix. In 2024, as NESO, we were commissioned by government to provide independent advice on the pathway towards the 2030 clean power ambition. Our Clean Power 2030 Report concluded that delivering a clean power system by 2030 will be possible: Clean Power 2030: Advice on achieving clean power for Great Britain by 2030.

NESO's zero carbon ambition that directly relates to your request is to be able to run Great Britain's electricity system carbon free for one thirty-minute settlement period in 2025, if the market provides us with electricity purely from renewable sources and the wider system conditions are conducive to safe and secure operation.

For information on NESO's ambitions for zero-carbon operations please see the following reports:

- Summer Outlook 2025
 - please see page 19 which details the ambition and describes the systems, operational tools and balancing services developed in support of that ambition
- Operability Strategy Report (March 2025)
 - please see page 8 which provides a definition of ZCO:
'Zero Carbon Operation is defined as the total transmission generation from domestic zero carbon generation sources, as a percentage of total GB transmission generation. Transmission connected generation is defined as generation directly connected to the transmission system and participates in the Balancing Mechanism. Domestic zero carbon transmission connected generation sources include power supplied from wind, solar, hydro, pumped storage, nuclear, biomass, and batteries. We will include other clean power technologies as they become operational.'

Further information on ZCO can be found here: <https://www.neso.energy/what-we-do/strategic-planning/zero-carbon-operation>.

Our response

We do not hold recorded information in scope of questions b) and c).

Regulation 12(4)(a) of the EIR states "A public authority may refuse to disclose information to the extent that it does not hold that information when an applicant's request is received." All EIR exceptions are subject to public interest test (PIT), however the Information Commissioner's Office (ICO) recognises that it is not possible to carry out a meaningful PIT where information is not held.

b) assessment of risks, impacts and mitigations which pertain to the management of the grid, including with regard to dynamic voltage capacity, inertia, frequency

You have asked for information 'regarding preparations to operate the grid without gas' i.e., the ambition to run Great Britain's electricity system carbon free for one thirty-minute settlement period in 2025. NESO continuously assesses operational risks associated with our real time management of the electricity power system and our operations. Our operational risk management approach means there is not a specific risk assessment for a ZCO settlement period, and we have therefore determined we do not hold information in scope of this question.

c) 'the thresholds which would require the "emergency" use of gas'

There is no threshold which would require the "emergency" use of gas, and we therefore confirm that NESO does not hold recorded information in scope of this question.

For information on the Electricity National Control Centre and how the electricity system is operated in real time please see here: [What does the Electricity National Control Centre do? | National Energy System Operator](#).

NESO will continue to operate a safe and secure system in line with our licence conditions and to do so we will use the tools and services available to us at any given time depending on system need. The ambition is that, during 2025, it will be possible for electricity generated within a settlement period to be from domestic zero carbon sources (as defined in the Operability Strategy Report linked above). If NESO runs the electricity system carbon free for one thirty-minute settlement period in 2025 this will have been possible because the market has provided us with electricity purely from zero carbon sources and wider system conditions are conducive to safe and secure operation.

This concludes our response to questions b) and c) of your request.

Next steps

We will respond to the remainder of your request on or before 11 August 2025.

If you are dissatisfied with our handling of your request, you can ask us to review our response. If you want us to carry out a review, please let us know within 40 working days and quote the reference number at the top of this letter. You can find our procedure here: [Freedom of Information and Environmental Information Regulations | National Energy System Operator](#). The ICO's website also provides guidance on the internal review process: [What to do if you are dissatisfied with the response | ICO](#).

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Thank you for your interest in the work of the National Energy System Operator (NESO).

Regards,

The Information Rights Team, National Energy System Operator (NESO)