

Public

Ref: FOI/25/294

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23 March 2026

Dear requester

Request for Information

Thank you for your request for information which was received by NESO on 20 February 2026. Your request has been considered under the Environmental Information Regulations 2004 (EIR). This is because the information requested relates to a measure that could affect the environment and therefore meets the definition of 'environmental information' provided at Regulation 2(1)(c) of the EIR.

Request

You asked us:

- 1. Please could you tell us how many modification applications NESO has received for modifying connections initially given for BESS, into a colocation BESS plus Data Centre Connection, or to a Data Centre. Please give the number of connections and the capacity in MW separately for Scotland and for England and Wales and the month/year that these came in. How many of these applications have been granted and for what MW capacity?*
- 2. In reference to Energy Future Scenarios 2025, or other subsequent NESO reports such as tRESP, what is the allocation of energy demand anticipated for data centres in Scotland, and over what time period?*

Our response

We can confirm that we hold information in scope of your request and have provided a response to your questions below:

- 1. Please could you tell us how many modification applications NESO has received for modifying connections initially given for BESS, into a colocation BESS plus Data Centre Connection, or to a Data Centre. Please give the number of connections and the capacity in MW separately for Scotland and for England and Wales and the month/year that these came in. How many of these applications have been granted and for what MW capacity?*

We are unable to report on the number of Mod Apps that have been submitted for the modification of a BESS connection to either a colocation BESS + Data Centre, or to a Data Centre, as we do not centrally record this information.

NESO classifies and records modification applications ('Mod Apps') as either 'Demand' or 'Generation & Demand'. There is currently no further categorisation of Mod Apps within our operational datasets. Information in scope of your request, where held, would likely be recorded in the technical appendices that a Customer provides alongside a Mod App submission. It is not possible for us to extract information in scope of your request without manually reviewing the relevant Mod Apps and accompanying technical appendices.

Compiling this information in order to respond to your request for information would represent an undue burden on the organisation. Regulation 12(4)(b) of the EIR allows a public authority to refuse a request to the extent which it is manifestly unreasonable, i.e., to respond to the request would represent an undue burden on the organisation. Whilst we are in no way suggesting that it was your intention to submit an unreasonable request, we would be required to individually review all Mod Apps (and their technical appendices) received for projects with Demand elements to identify connection modifications that meet the scope of your request. We therefore estimate that identifying recorded information for this part of your request would require a significant amount of employee resource with the effect that it would be manifestly unreasonable for us to respond.

NESO endeavours to consider all elements of the FOIA and EIR when responding to a request for information. Unlike the Freedom of Information Act, where Section 12 allows for refusal of a request where compliance would exceed 18 hours of staff time, the EIR have no appropriate cost limit. It may be helpful to understand that there are over 200 Projects with Demand elements that have one or more Mod Apps assigned to them, totalling over 300 Mod Apps that would require review. Due to the complexity of the technical appendices, subject matter experts within NESO's Connections teams have advised that it would likely take a member of staff up to 30 minutes to review a single Mod App and identify the detail of the modification. Should it take 30 minutes per Mod App a complete review would exceed 150 hours of staff time (over 20 working days). This

clearly represents a significant burden on the organisation in terms of staff time and resultant costs.

When engaging Regulation 12(4)(b) of the EIR, burden can be thought of in terms of cost and can also take account of the distraction of resources, i.e., the disruption to the delivery of other services caused by staff having to spend time dealing with the request. We acknowledge that we are normally expected to exceed the FOIA appropriate cost limit for EIRs, but complying with this request would require significant resource from specialist teams who are currently managing an Information Request Notice (IRN) process that is designed to better understand the demand connections pipeline thereby supporting a more effective and efficient connection process, whilst also continuing to deliver a transformational change to the Connections process, making it fit for the future and supporting the delivery of Clean Power by 2030.

The ICO encourages public authorities to consider extending the EIR deadline as a preference to refusing a request and we do look at this option where it is feasible. In this case, it is not the 20-working day deadline that is the issue, but the onerous burden that managing the request would place on NESO. This is particularly the case for connections related requests given that the employees involved in the extracting and collating the data in question would be diverted from key tasks relating to the connections reform process.

The exception provided at Regulation 12(4)(b) of the EIR is subject to the public interest test.

There is a general public interest in public organisations being accountable and transparent and NESO ensures that it upholds as far as possible the presumption of disclosure under EIR. The disclosure of information in many circumstances may increase public understanding of decision making, facilitate effective public participation and, in this case, increase the public's knowledge of how the electricity network and the connections process is managed.

Public authorities must however be protected from any disproportionate burden caused by requests for information. It is not in the public interest for NESO's resources to be diverted away from its key functions nor from current work on demand connections that will increase transparency and understanding of the demand queue and inform potential regulatory change.

Despite the presumption in favour of disclosure, the excessive burden of responding to your request means that we conclude that the public interest lies in maintaining the exception in Regulation 12(4)(b) of the EIR. This is because we believe that to respond to this part of your request would represent a disproportionate burden on the organisation and its staff and we do not believe that the value or purpose of the request would justify the burden. The ICO guidance is

clear that the burden to be considered under this exception includes the diversion of resource away from other priorities and activities. NESO is funded by consumers, and it is in the public interest to use resources to deliver licensed activities and services in cost-effective way.

Regulation 9 of the EIR requires that *"A public authority shall provide advice and assistance, so far as it would be reasonable to expect the authority to do so, to applicants and prospective applicants."*

When refusing a request on the grounds that it is manifestly unreasonable, public authorities are expected to advise requesters how they might refine their requests to a more appropriate level. We are however finding it difficult to provide advice on narrowing down the scope of your request in such a way that we would be able to provide a response without it being overly burdensome and diverting employee resource from key activities. You are not required to explain why you are requesting particular information under the EIR but, should you wish to submit a refined request for information, any further explanation you can provide may help us to understand your data requirements.

2. *In reference to Energy Future Scenarios 2025, or other subsequent NESO reports such as tRESP, what is the allocation of energy demand anticipated for data centres in Scotland, and over what time period?*

The [Future Energy Scenarios \(FES\) 2025](#) publication includes our range of data centre forecasts.

- Pages 110–111 of the full FES report details why these vary and the uncertainties we deal with. You will note on page 110 we state *'With sufficiently strong locational signals, we anticipate a maximum of 20% of future data centre demand could be located in Scotland'*
- The data behind Figure 49 (pg 110) is provided in Tab F47 of the [FES 2025 Data Workbook](#).
- Tab ED1 of the same Data Workbook provides a full numerical range of electricity demand projections for all FES pathways and can be filtered to show only Data Centre demand.
- The [FES: Pathway Assumptions 2025 \(workbook\)](#) provides a detailed breakdown of the source assumptions.

All published information relating to the transitional Regional Energy Spatial Plans (tRESP) can be accessed here: [transitional Regional Energy Strategic Plan \(tRESP\) | National Energy System Operator](#).

For information:

- The transitional RESP (tRESP) is the first output from NESO's Regional Energy Strategic Plan (RESP) team. It is designed as a bridge between the current approach to energy distribution network planning, and the full RESP approach which will be in place from 2028.
- The electricity distribution network operators (DNOs) will use the tRESP alongside Ofgem's business planning guidance, to develop their plans for the third electricity distribution price control period (ED3), which covers 2028–33.
- Data centres were not a category in the tRESP Pathways (which standardised planning for high volumes of small-scale demand technologies) but could be included in the Strategic Energy Needs.
- The Strategic Energy Need component of the tRESP determines geographic areas where a strategic approach to electricity network investment may be required to enable key priorities across Great Britain, and identifies the drivers of related additional capacity, including data centres. The Strategic Energy Need is not a comprehensive view of all demand from data centres. It includes only data centres which were included in response to NESO's Request for Information, and that met certain assessment outcomes (not yet connected and with no connection agreement, but meeting thresholds of strategic value, uncertainty, scale and timing).
- In addition to further reviewing the Strategic Energy Needs, DNOs will also consider additional data centres – both connected and agreed – in their network plans.
- For information, data centres may also connect at transmission rather than distribution level. The Strategic Energy Need informs ED3 and strategic planning but does not itself indicate any allocation of energy demand for data centres in Scotland.

This concludes our response to your request.

Further information

Information on the modification of connections contracts is available on the following webpages:

- [Your Connections journey | National Energy System Operator](#)
- [Gated Modification Guidance](#)

In collaboration with government and Ofgem, NESO is working at pace to identify and implement solutions that ensure fair and efficient access to the transmission network for demand projects. A critical part of this effort is ensuring that decisions are based on accurate, up-to-date data about the existing queue. Activities supporting this include NESO's Demand Call for Input, which was issued in November 2025, and more recently, NESO's Demand Information Request Notice (IRN). More information on the IRN as well as high level insights from NESO's Call for Input can be found here: [Demand Information Request Notice \(IRN\) | National Energy System Operator](#).

Further information from Ofgem on the demand connections programme is available: [Demand connections update | Ofgem](#)

Next steps

If you are dissatisfied with our handling of your FOI/EIR 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)