

Public

Ref: FOI/26/178 and

Ref: FOI/26/179

National Energy System Operator

Faraday House

Gallows Hill

Warwick

CV34 6DA

InformationRights@neso.energy

www.neso.energy

21 September 2026

Dear requester

Request for Information

Thank you for your two requests for information which were both received by NESO on 21 August 2026. You asked us about transmission projects required for the Clean Power 2030 Action Plan. The full requests are in the Appendix. This is a combined response to both requests.

Your requests have been considered under the Environmental Information Regulations 2004 (EIR) as the requested information falls within the definition of environmental information in Regulation 2(1)(c) of the EIR

Our response

Overall, responding to the long list of questions in your requests represents a significant amount of resource and we could apply the “manifestly unreasonable” exception at Regulation 12(4)(b) to the full requests. We have instead broken down our responses and applied this exception to only one of your questions. We have explained our use of four EIR exceptions below. You can also find information about the exceptions at: [The Environmental Information Regulations 2004](#) and [Information Commissioner's Office](#).

Response to information request FOI/26/178

Questions 1-4

- Of the projects in the N1 list we can confirm that all but one are currently tagged by NESO as required for CP30.

- The Beyond 2030 Update published in June this year included a Data Workbook which includes information about projects required for CP30. You can find this on our website: [Beyond 2030 – Electricity Transmission Update | National Energy System Operator.](#)
- We currently receive updates on the progress of transmission projects from the Transmission Owners (TOs), but this information is not received specifically for the purposes of tracking against the CP30 timelines. Information relating to the status of specific projects has been provided to NESO by TOs on a confidential basis and NESO owes a duty of confidence to the TOs under the provisions of the System Operator Transmission Owner Code (STC), NDAs, and/or the common law duty of confidence. We are unable to disclose information beyond what we have already published, and we have explained our application of the exception at Regulation 12(5)(e) in the ‘Engagement of exceptions provided by the EIR’ section below.
- NESO has not carried out detailed analysis to re-evaluate the whole CP30 Plan. Neither has NESO completed any independent analysis or audit of delivery dates. These are provided to us by the TOs.
- The National Audit Office undertook an audit on Upgrading the Electricity Transmission Network: [Upgrading the electricity transmission network – NAO report](#). This was published after NESO received your request, but the content of the report does provide updated information on the status of projects at aggregated level which responds at least in part to your questions. You will see that the NAO audit relied on data from a number of sources, and we advise that you may wish to request information from the TOs and Ofgem or to contact the National Audit Office for further information.
- You have asked us to provide any assessments outside of the Transmission Works Report (TWR). We do not hold any data to this effect. Where information is not held by a public authority at the time a request is received that request (or part of a request) may be refused under Regulation 12(4)(a) of the EIR – further information on the engagement of this exception is provided in the ‘Engagement of exceptions provided by the EIR’ below.

Question 5

We have identified recorded information in scope of this question however we are withholding this information on the basis that it is draft/unfinished/incomplete. Please see our explanation of the exception provided at Regulation 12(4)(d) of the EIR in the ‘Engagement of exceptions provided by the EIR’ section below.

Question 6

Requests which include questions about a broad set of documents including correspondence are often a challenge for public authorities. We have undertaken preliminary centralised IT searches which have returned high volumes of potential information (approximately 80,000 results). Further refinement of this centralised search to limit results to documents, correspondence etc in

which Ofgem, DESNZ or any of the three TOs were participants returned over 13,000 items. We have looked at alternative methods of searching for this information and would need to ask staff within two directorates (comprising 400 FTE in total) to individually check their files.

In view of the considerable resource that it would take to review the search results, we are refusing this part of your request as “manifestly unreasonable”. We are in no way suggesting that your intention is unreasonable, but the effect of the request is that it would require disproportionate resource and would divert employees from their other key activities. Further explanation on the use of the EIR exception at Regulation 12(4)(b) is provided in the ‘Engagement of exceptions provided by the EIR’ section below.

Question 7

NESO has published transmission network investment estimates for Clean Power 2030 in Figure 19 of its CP2030 analysis. This includes average annual onshore transmission investment of £4.7 billion between 2025 and 2030, equivalent to approximately £28.2 billion over the six-year period. Separate offshore network investment estimates are also provided for the CP2030 pathways.

The approximately £80 billion figure referred to in your request does not appear in NESO’s published CP2030 analysis.

NESO does not hold analysis specifically estimating how these investment costs would be recovered through consumer bills. Transmission network costs are generally recovered through Transmission Network Use of System (TNUoS) charges. Further information is available on NESO’s <https://www.neso.energy/industry-information/charging/transmission-network-use-system-tnuos-charges>.

NESO does not hold updated CP2030 transmission network investment cost estimates. Although network-related figures have since been published through Future Energy Scenarios 2025 and Ofgem’s RIIO-3 price control process, these are not directly equivalent to the CP2030 investment estimates and do not constitute revisions to them.

Where information is not held by a public authority at the time a request is received that request (or part of a request) may be refused under Regulation 12(4)(a) of the EIR – further information on the engagement of this exception is provided in the ‘Engagement of exceptions provided by the EIR’ below.

Response to information request FOI/26/178

As we explained above, we currently receive updates on the progress of transmission projects from the TOs. This includes planning consents and other milestones or issues. As explained, this

information is received from the TOs on a confidential basis. NESO cannot comment on specific projects and considers this information exempt under the exception at Regulation 12(5)(e) of the EIR. NESO does not estimate or assess the delivery dates for specific projects as these are provided to NESO by the TOs.

Engagement of exceptions provided by the EIR

- Regulation 12(4)(a) – information not held

The EIR only apply to information held by the public authority at the time that the request for information is received (Regulation 3). As we do not hold recorded information in scope of your request, we are engaging Regulation 12(4)(a) of the EIR which allows a public authority to refuse a request if it does not hold that information when an applicant's request is received. All EIR exceptions are subject to a 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.

- Regulation 12(4)(b) – manifestly unreasonable

This Regulation states:

- 12.—(4)For the purposes of paragraph (1)(a), a public authority may refuse to disclose information to the extent that—*
- (b)the request for information is manifestly unreasonable;*

We note that you submitted two related requests to NESO on the same day, one at 12:42 and the second at 12:51. You may not be aware that under Section 12 of the FOIA, public authorities are able to aggregate two or more separate requests for the purpose of estimating the costs of complying with those requests. The ICO references this in its guidance on costs and Section 12: [Requests where the cost of compliance exceeds the appropriate limit \(section 12\) | ICO](#).

In particular, you may find it helpful to understand the conditions for aggregation which are set out in regulation 5 of the Fees Regulations:

- *The requests are made by one person, or by different persons who appear to the public authority to be acting in concert or in pursuance of a campaign;*
- *The requests relate, to any extent, to the same or similar information; and*
- *The requests are received by the public authority within any period of 60 consecutive working days.*

There is no direct equivalent under the EIR, however, costs and burden that a request poses to a public authority can be taken into account when determining whether a request is manifestly

unreasonable and therefore covered by the EIR exception at Regulation 12(4)(b). The ICO guidance on manifestly unreasonable requests provides further explanation: [Manifestly unreasonable requests – Regulation 12\(4\)\(b\) \(Environmental Information Regulations\) | ICO](#)

Although the FOIA fees regulations do not apply under the EIR and there is no specific provision for the aggregation 'of substantially similar' requests, the ICO takes the view that it is permissible to consider a number of EIR requests together when deciding if they are manifestly unreasonable because of cost or burden. This approach was taken in a ICO case [FS50464000](#) and is in line with the approach to requests considered manifestly unreasonable on the grounds that they are vexatious in the wider sense, where the context in which they are made can be taken into account.

NESO endeavours to consider all elements of the FOIA and EIR when responding to a request for information. We are mindful of the differences between the two sets of obligations, the presumption in favour of disclosure that applies to the EIR, the requirements to conduct public interest tests, and the guidance on cost limits. As the ICO guidance sets out, whilst the fees regulations do not apply to requests made under the EIR and public authorities may be required to accept a greater burden when providing environmental information than under the FOIA, *"we take these regulations to give a clear indication of what Parliament considered to be a reasonable allocation of resources when dealing with requests in terms of staff time."*

We consider that question 6 of your first request (FOI-26-178) is 'manifestly unreasonable' and have limited our use of this exception to that question rather than applying it to your two requests overall.

To ensure that we locate all relevant recorded information, we have conducted a centralised search of our Microsoft tenancy. This search returned a significant number of results. Based on our experience of these searches, it is likely that in most cases, there are references to CP30 and linked or separate references to transmission projects or delays in correspondence and attachments and that many of these will not fall within the scope of your request, but we would need to review all the recorded information to determine this. We would then need to consider whether any of the information in scope of your request was exempt from disclosure. It is likely that some correspondence, especially that with the TOs, would include or comprise commercially sensitive project-specific information which would be exempt from disclosure under the EIR exception at Regulation 12(5)(e). The alternative to a centralised IT search would be to ask multiple colleagues in multiple teams to individually search their emails and chat messages. This would be equally time consuming for NESO as a whole. At 10 mins per member of staff, we estimate that this would represent over 90 hours of staff time.

The Information Rights Team would need to review each search result to determine whether it fell within the scope of the request and whether it was likely to be exempt. We may also need to consult with colleagues in relation to potentially exempt information

- **Regulation 12(4)(d) – Material in the course of completion, unfinished documents, and incomplete data**

This regulation states:

12.-(4) For the purposes of paragraph (1)(a), a public authority may refuse to disclose information to the extent that—

(d) the request relates to material which is still in the course of completion, to unfinished documents or to incomplete data.

We confirm that we hold additional recorded information which falls within the scope of question 5 of your first request (FOI/26/178), but this is information that comprises material still in the course of completion, and incomplete or draft documents.

The ICO guidance states:

A draft version of a document is still an unfinished document, even if the final version of the document has been published.

Where we have published final documents, we still hold previous draft versions and are withholding these also under this EIR exception.

- **Regulation 12(5)(e) – Commercial or industrial information**

This regulation states that a public authority may refuse to disclose information to the extent that its disclosure would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest.

Information is covered by Regulation 12(5)(e) if:

- The information is commercial or industrial in nature;
- Confidentiality is provided by law;
- The confidentiality is protecting a legitimate economic interest;
- The confidentiality would be adversely affected by disclosure.

Information relating to specific transmission projects is commercial in nature and our use of this exception is primarily in respect of the potential consequence to the TO's commercial interests. The System Operator – Transmission Owner Code (STC) includes confidentiality requirements for NESO when the TOs provide information to NESO for our System Operator purposes. You can find more information about the STC on our website: [System Operator Transmission Owner Code](#)

(STC) | National Energy System Operator. NESO has to be able to obtain confidential, commercially sensitive information from TOs to fulfil its statutory and licensed activities and that confidentiality would be adversely affected by disclosure.

NESO also falls within the scope of the Utilities Act 2000 and Section 105 of that Act makes it a criminal offence to disclose information: a) obtained under the Utilities Act 2000 and any other key energy legislation such as the Gas Act 1986 and the Electricity Act 1989, subject to specific exceptions; and b) where the information relates to the affairs of any individual or any particular business during the lifetime of the individual or so long as the business continues to be carried on.

Public Interest Test (Re Regulations 12(4)(b), 12(4)(d) and 12(5)(e) of the EIR)

- We are required to complete a public interest test for all EIR exceptions (see note above relating to the exception provided at Regulation 12(4)(a)).
- Where more than one exception is engaged, we can aggregate the public interest arguments.
- As always, we are mindful of the presumption in favour of disclosure and the general public interest in transparency and accountability. We acknowledge that there is ongoing public interest in and debate around energy related issues at the current time and in climate change related matters, in particular information relating to the cost of achieving clean power and the cost of energy to consumers. There is a public interest in facilitating a public understanding of the progress of infrastructure projects that support clean power. We recognise that the disclosure of information can assist the public's understanding of the issues and make it easier for them to participate in public debate, and understand decisions, policies, and plans.
- ICO guidance acknowledges that a request can impose a significant burden where it requires a public authority to sift through a large volume of material, isolate relevant information, and consider exceptions and redactions. Public authorities must be protected from any disproportionate burden which requests for information may impose. It is not in the public interest for NESO's resources to be diverted away from its public tasks and licensed activities where the burden of responding would be excessive. Taking all these factors into account, we have concluded that the public interest lies in maintaining the exception in Regulation 12(4)(b). We also considered whether it would be more appropriate to extend the time for responding under Regulation 7(1) of the EIR. We have concluded that an extension would not resolve the burden in this case.
- It is not in the public interest to release information which is still in draft format as this could result in public misinformation and loss of trust amongst wider stakeholders. Similarly, where a final version of a document has been published, it is unhelpful to publish earlier draft versions as this would cause confusion and earlier drafts will contain incomplete information. We have, therefore, concluded that the public interest lies in maintaining the exception at

Regulation 12(4)(d) and are withholding information still in the course of completion, and draft and unfinished documents.

- There is a public interest in ensuring that TOs are not materially disadvantaged through disclosing confidential commercial information. The transmission network upgrades are essential projects. NESO is the designated independent system operator and planner under the Energy Act 2023 and must remain independent, fair, and consumer focused. Disclosure could erode trust within the sector, hampering NESO's role and our ability to drive forward reforms and initiatives that would bring benefits to consumers and to the environment. On balance, we have concluded that the public interest lies in withholding the information under Regulation 12(5)(e).

Advice and assistance

- You may wish to address some of your request questions to the Transmission Owners who are also subject to the EIR.
- The National Audit Office report may also provide a helpful overview.
- In terms of the question which we have refused as manifestly unreasonable, we have provided an explanation of the time and resource involved. You may wish to refine your request further. It is likely that much of the correspondence with the TOs would relate to specific projects which would be exempt from disclosure as commercially sensitive/confidential. Limiting the organisations that you have set out in your request may assist with refining your request to a more manageable scope. Many of our employees send information to DESNZ as part of routine activities and CP30 shapes much of our work. You could consider limiting the correspondence to senior managers or think about whether you can be more specific about your request.

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)

Appendix

FOI/26/178

1. Please confirm, as of the most recent version of the Clean Power 2030 Data Workbook: (a) how many rows on sheet NI are currently marked 'Required for CP30'; (b) how this figure relates to the figures of 80 projects ('needed for Clean Power 2030') and 88 projects ('needed for cost-effective delivery') referenced in NESO's Clean Power 2030 Advice and Annex 2 of the DESNZ Clean Power 2030 Action Plan; and (c) whether the set of projects, or the total number, has changed since the Data Workbook and/or the CP2030 Advice were first published, and if so how and when.

2. For each of the projects identified in response to Q1, please provide NESO's current assessment of the date on which the relevant network capability or reinforcement is expected to become operationally available – that is, the date NESO itself considers relevant to delivery of that project's contribution to Clean Power 2030, as distinct from any Transmission Works Register 'MW Effective From' date attached to an associated customer connection, enabling work or substation work.

3. Based on the assessment in Q2, please state NESO's current estimate of how many of the NI 'Required for CP30' projects are expected to be delivering their intended contribution to the electricity network by 31 December 2030, and how many are not.

4. Does NESO maintain any internal tracker, dashboard, risk register or equivalent document that monitors delivery of the NI 'Required for CP30' projects specifically against the Clean Power 2030 timetable (as opposed to the Transmission Works Register, which NESO has said is not designed for this purpose)? If such a document exists, please provide a copy, or the underlying data in the format in which it is held. If no such document exists, please confirm this in terms.

5. Please provide any assessment, analysis, advice, briefing or correspondence produced or held by NESO since 1 January 2026 concerning: (a) the overall likelihood of the Clean Power 2030 target (a 95% decarbonised electricity grid by 2030, as set out in the Clean Power 2030 Action Plan) being met; and (b) the level of grid decarbonisation NESO expects to be achievable by 31 December 2030 if it is not met in full.

6. Please provide copies of any submissions, advice notes, board papers or correspondence sent by NESO to DESNZ, Ofgem, or transmission owners since 1 January 2026 that discuss the risk of delay to transmission projects identified as critical to Clean Power 2030, including (but not limited to) any discussing Eastern Green Link 2 or the Beaulieu–Denny upgrade, which NESO has separately acknowledged (in correspondence with the Daily Telegraph, August 2026) have

Transmission Works Register dates of December 2035 and November 2036 respectively against NESO delivery years of 2029 for both.

7. Please confirm the total capital cost currently estimated for the transmission network investment associated with Clean Power 2030 (reported elsewhere as approximately £80bn), how this is expected to be recovered through network charges and consumer bills, and whether this estimate has been revised since it was first published, and if so, why.

FOI/26/179

Sea-Link (Suffolk–Kent subsea link)

NESO's Clean Power 2030 Advice records Sea-Link as one of a small number of projects needing acceleration to meet CP2030 (alongside the Norwich-to-Tilbury corridor below).

Project / code	Description	NESO due year (NI)	Latest TWR date	Match confidence
SCDI – Sea-Link	New offshore circuit between Suffolk and Kent	2031	31 Oct 2032	High

East Anglia–Thames Estuary corridor ("Norwich to Tilbury")

NESO's own workbook records several segments of this corridor – which carries East Anglian offshore wind power south to London and the South East – as already Built, yet the Transmission Works Register shows associated works on the same route running to October 2033. This corridor includes the Bramford hub referenced in our earlier correspondence.

Project / code	Description	NESO due year (NI)	Latest TWR date	Match confidence
AENC	New circuit in north East Anglia	2031	31 Oct 2030	Medium
ATNC	New circuit in south East Anglia	2031	31 Oct 2032	Medium
BPRE	Reconductor new 2nd Bramford–Braintree–Rayleigh Main circuit	2028	31 Jul 2035	Medium
BRRE	Reconductor remainder of Bramford–Braintree–Rayleigh route	2025	31 Jul 2035	Medium
BTNO	New circuit between Bramford and Twinstead	2029	30 Oct 2033	High
NBRE	Reconductor Bramford–Norwich double circuit	Built	30 Oct 2033	Medium

CTRE	Reconductor remainder of Coryton South–Tilbury circuit	Built	30 Oct 2033	Medium
RTRE	Reconductor remainder of Rayleigh–Tilbury circuit	Built	30 Oct 2033	Medium
NBEU	Thermal upgrading of Bramford and Norwich substations	2025	30 Oct 2031	Medium

Eastern Green Links

Project / code	Description	NESO due year (N1)	Latest TWR date	Match confidence
E4D3 – Eastern Green Link 2	New offshore HVDC link, Peterhead to Drax	2029	31 Dec 2035	High
E2DC – Eastern Green Link 1	New offshore HVDC link, Torness to Hawthorn Pit	2030	30 Oct 2035	Medium

Beaulieu–Denny corridor

Project / code	Description	NESO due year (N1)	Latest TWR date	Match confidence
BDUP	Upgrade Beaulieu–Denny network to higher voltage	2029	11 Nov 2036	Medium
DNEU	Denny North 400/275kV second supergrid transformer	2025	31 Oct 2035	High

Feckenham hub (Worcestershire)

On our analysis this is the single most delayed cluster in the entire N1 list, relative to both NESO's own delivery years and the CP2030 calendar-year cutoff.

Project / code	Description	NESO due year (N1)	Latest TWR date	Match confidence
CDP1 / CDP2 / CDP3	Power control devices on the Cellarhead–Drakelow circuit (three phases)	2027	30 Nov 2037	High
IFR1	Reconductor Feckenham–Ironbridge circuit	2028	30 Nov 2037	High
FHRE	Reconductor Feckenham–Hams Hall circuit	TBC	30 Nov 2037	High

FMR2	Reconductor Feckenham– Minety circuit	2029	30 Nov 2037	High
------	--	------	-------------	------

Rye House voltage support

Project / code	Description	NESO due year (N1)	Latest TWR date	Match confidence
RHM1 / RHM2	Voltage support equipment at Rye House (two phases)	2028	31 Oct 2037	Low

Information requested

For each project or cluster listed above, please provide:

- 1. NESO's current best estimate of the date on which the project (or, for a cluster, each constituent project) is expected to be operationally available and capable of making its intended contribution to the electricity network – as distinct from the Transmission Works Register date shown, which we understand may reflect an associated customer connection or enabling work rather than delivery of the core reinforcement.*
- 2. Confirmation of whether NESO still assesses the project as deliverable in time to make its intended contribution to Clean Power 2030 by 31 December 2030, and if not, NESO's current estimate of when it will be delivered.*
- 3. For NBRE, CTRE and RTRE, which sheet N1 records with a delivery status of 'Built': an explanation of what 'Built' denotes in this context (for example, whether it reflects full operational capability of the reinforcement identified in the Clean Power 2030 pathway, or a partial/interim stage), and an explanation of why Transmission Works Register entries associated with these schemes show works continuing until October 2033.*
- 4. Any risk register entries, delivery confidence ratings, or reasons for delay recorded by NESO or the relevant transmission owner (National Grid Electricity Transmission, SP Transmission, or Scottish Hydro Electric Transmission, as applicable) in respect of each project or cluster.*
- 5. Any consenting, planning, supply chain, or grid-connection-queue barriers recorded against each project or cluster that NESO considers material to its delivery timetable.*