

Public

Ref: FOI/26/208

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8 October 2026

Dear requester

Request for Information

Thank you for your request for information which was received by NESO on 9 September 2026. Your request has been considered under the Environmental Information Regulations 2004 (EIR) as we have determined that the requested information falls within the definition of 'environmental information' at Regulation 2(1)(c) of the EIR.

Request

Following our response to a previous information request (FOI-26-167) you asked us on 9 September for the following information:

I am now interested in what PwC have produced. Anticipating it may be extensive, could I see copies of their reports, or if too great, a list of titles/abstract. My main area of interest is in how the value of natural capital has been included in spatial planning

We asked you clarify your request, and following your response of 10 September, we confirmed that we understood your request to be for recorded information in scope of:

PwC's guidance (reports) relating to:

- *the SSEP only (which has a spatial element); and*
- *how it [the SSEP] aligns with the Green Book (which includes natural capital valuation)*

Our response

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

PwC are providing external independent assurance across NESO's SEP (Strategic Energy Planning) portfolio, including the Strategic Spatial Energy Plan. This includes assurance relating to the alignment of SEP projects, including SSEP, with the HMT 'Green Book'. Further information on the assurance process for the SSEP is available in the [SSEP Transparency Update](#).

Information disclosed:

We enclose with this letter copies of the following documents in response to your request:

- *NESO SSEP Methodology Review – Final Report – 30 May 2025*
- *Gap Analysis and Roadmap – June 2025*
- *Strategic Spatial Energy Plan (SSEP) Programme Management Review – Final Report – June 2025*
- *NESO SSEP approach actions from PwC review – Final Report – June 2026*
- *NESO SSEP data controls actions from PwC review – Final Report – June 2026*
- *Strategic Spatial Energy Plan (SSEP) Assurance Framework Review – Final Report – July 2026*

Please note that we have provided an extracted section from the Gap Analysis and Roadmap, to provide you with the information within that document that is in scope of your request. The redaction in this document has been applied to information that is out of scope; it does not indicate that we are applying an exception.

The names and job titles of NESO staff have been withheld from disclosure and redacted from the above documents, in accordance with the exception provided at Regulation 13 of the EIR. Information is exempt from disclosure under Regulation 13 of the EIR where it is personal data (i.e. information that would enable the identification of an individual) and where disclosure of that personal data would contravene one of the data protection principles provided at Article 5(1) of the UK General Data Protection Regulations (UK GDPR). We have redacted names and job titles to ensure compliance with the principle of 'lawful, fairness and transparent' processing of personal data, taking into account the likely expectations of individuals regarding the processing of their personal data, and recognising that we do not have a lawful basis for such processing.

Information withheld

Regulation 12(4)(d) of the EIR states that a public authority may refuse to disclose information to the extent that the request relates to '*material which is still in the course of completion, to unfinished documents or to incomplete data*'. Regulation 12(4)(d) may also be engaged if the requested information *relates to* material still in the course of completion, to unfinished documents or to incomplete data.

The ICO's guidance on this exception confirms that: *"Draft documents will engage the exception because they are, by definition, unfinished."* The guidance also confirms that: *"A draft version of a document is still an unfinished document, even if the final version of the document has been published."*

We have identified three further documents as recorded information in scope of your request, but are withholding these from disclosure under Regulation 12(4)(d):

- *NESO SSEP data controls actions from PwC review – DRAFT – May 2026*
- *NESO SSEP approach actions from PwC review – DRAFT – May 2026*
 - We are disclosing the final versions of these two documents in response to your information request.
- *NESO SSEP Pathway Options Report review – DRAFT – August 2026*
 - At the date of your request, a final version of this document was not held by NESO nor held by any other organisation on our behalf.

We are required to complete a public interest test for all EIR exceptions.

As always, we are mindful of the presumption in favour of disclosure and the general public interest in transparency and accountability of public authorities. We also recognise that the disclosure of environmental information can also inform public debate and acknowledge that there is public interest in NESO's role in strategic energy planning, and in understanding how we develop plans and recommendations like the SSEP, including the assurance processes that are in place.

It is not in the public interest to release information, which is still in draft format, where that information will not demonstrably add to the public's understanding of an issue or process. Where a final version of a document has been published or will be disclosed, it is unhelpful to publish earlier draft versions as this could cause confusion and will not further inform any understanding or public debate.

On balance, we have, concluded that the public interest lies in maintaining the exception at Regulation 12(4)(d) and are withholding information that is 'still in the course of completion, draft and unfinished documents'.

This concludes our response to your request.

Further information

Our obligation under the EIR is to identify recorded information in scope of a request and disclose that information unless an exception provided by the legislation applies. We have complied with the legislation by providing you with the response above and accompanying documents.

As the reports disclosed alongside this response letter date back to June 2025 and represent the position and guidance as at the date of each report, we would also like to provide you with some further information on the work of the SSEP programme in the ensuing months. This information is provided outside our obligations under the EIR.

As an independent public corporation NESO is not mandated to follow the Green Book but refer to the guidance as a guide for good practice. In many cases, we will follow the Green Book given that these principles and measures generally reflect good economic practice or latest research. In all approaches used by NESO the work undertaken remains valid and our methodologies are approved by the regulator following engagement with stakeholders to ensure they are robust. The SSEP methodology was also approved by DESNZ.

As you will see, a number of recommendations were made by PWC, which is to be expected. For context, at the time of sending this response, 77% of the 117 recommendations across the reports have been closed, with plans for the remainder in place. Many of the recommendations raised in 2025 had been addressed by the time the pathways were developed for the second time in 2026 utilising updated data. It is worth noting that some of the recommendations are for consideration in future versions of the SSEP and are included in the 23% for which there are plans in place.

Given the focus of this and previous information requests, we thought it may be helpful to provide some additional information on the recommendations related to the Green Book

We believe that SSEP 1 applies an appropriate and proportionate approach to appraisal of pathways, reflecting the programme's strategic, whole-system nature and the maturity of the available evidence. The Green Book provides guidance, while allowing programmes such as SSEP to exercise judgement to identify and apply methods that are proportionate to the specific programme.

The SSEP is not suited to a conventional Cost Benefit Analysis (CBA) approach because it is a whole-system pathway planning exercise, rather than a discrete project or investment appraisal. SSEP appraisal intentionally considers factors broader than cost – including environmental, societal, policy, spatial, operability and deliverability – which could not be reliably monetised,

particularly within the timing available for the development of SSEP 1. The programme is therefore better assessed through system optimisation modelling, scenarios, sensitivities and multi-dimensional pathway appraisal than through a traditional benefit-cost comparison.

The decision to adopt a modified MCA (multi-criteria analysis) was driven by a combination of data maturity, the need for a practical GIS-compatible methodology and practical considerations such as timescales and resource requirements. MCDA (multi criteria decision analysis) was considered but judged disproportionate and not feasible for the first SSEP, with enhancements incorporated into the MCA approach to improve transparency, robustness and alignment with good practice. It was also concluded that, in the circumstances, MCDA was not expected to provide sufficient additional decision-making value to justify its practical demands.

The Spatial Evaluation Framework (SEF) was developed to provide a transparent, spatially based multi-criteria assessment framework that integrates environmental, societal, spatial-use and technical evidence. This was used to identify the most suitable zonal locations for future energy infrastructure and support decision-making within the Strategic Spatial Energy Plan.

The SEF also was not the sole decision-making tool. Potential limitations associated with MCA, particularly around weighting and subjectivity, were mitigated through subsequent Down-Selection and Appraisal stages, where pathway trade-offs were considered alongside additional evidence, including economic appraisal and cost-effectiveness analysis aligned to Green Book principles. Stakeholder feedback also informed these later stages, providing qualitative evidence to test assumptions, identify practical considerations and support a more rounded assessment of pathway trade-offs.

Following the modified MCA used in the SEF, down-selection and appraisal assessments, further sensitivity analysis was conducted to test the robustness of the results under different assumptions and scenarios. That, alongside that the analysis and narrative of the POR report, provides further evidence on the relative costs, benefits and trade-offs of the pathways, supporting the Secretary of State with the information needed to make informed judgements.

The programme will consider whether a different approach would be beneficial for the next SSEP, recognising that potentially longer lead times could provide greater scope to develop the evidence base, improve data maturity, undertake more extensive analysis and testing, and assess whether alternative appraisal methodologies would add proportionate value to decision-making for SSEP2.

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)