

Public

Ref: FOI/25/283

National Energy System Operator
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11 March 2026

Dear requester

Request for Information

Thank you for your request for information which was received by NESO on 11 March 2026.

Your request has been considered under the Environmental Information Regulations 2004 (EIR). This is because information about connection agreements 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:

Thank you for your response to FOI/25/214.

Please accept this email as a submission of a refined request intended to minimise the burden on your organisation and avoid any requirement for manual reconciliation or creation of a new dataset.

I am therefore not requesting aggregated totals or derived analysis. I am requesting:

1. *A copy of the existing internal milestone report mentioned in your previous correspondence (or equivalent extract) which records milestone entries for projects as at the G2WQ cut off date:*
 - *Project category*
 - *Milestone type: i.e. M1 (Initiate Planning Consent); M2 (Obtained Planning Consent) etc*
 - *Milestone status: achieved or not*

2. *The extract should be for projects located in:*
 - (a) *Scotland; and*
 - (b) *England and Wales*
3. *I do not require:*
 - *Any aggregation*
 - *Capacity summation*
 - *Cross-checking*
 - *Reconciliation*
 - *Explanatory commentary*
 - *Manual validation*

I would be happy to receive the data in a form that creates the minimum effort for you to provide it i.e:

- *A direct system extract in its native format; or*
- *A PDF printout; or*
- *Screenshots of the filtered milestone report; or*
- *A simple list containing:*
 - *Project identifier*
 - *Region (Scotland/England)*
 - *Phase (1 or 2)*
 - *Milestone type (M1/M2)*
 - *Milestone achieved date*

This request is intentionally limited to information already held in recorded form as identified in your recent response to our previous request and does not require NESO to create a new dataset or perform manual reconciliation.

Our response

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

We explained in our response to your previous request (FOI/25/214) that our Connections tool does have an internal milestones report that shows M1, M2 and other milestone entries for each project. However, we also explained that this report cannot be exported (e.g. to a spreadsheet). The underlying data model records milestones as multiple line items per project rather than as a structured dataset. The current system is very much designed for the management of individual cases and is not set up for the kind of reporting required to meet your request. We referred to a Decision Notice (Reference IC-402508-Z0G9) from the Information Commissioner which includes a useful analysis of how our current connections information is held. The full decision is available on the Information Commissioner's Office (ICO) website: [National Energy System Operator \(NESO\) | ICO](#).

We fully appreciate that your intention in submitting your refined request FOI/25/283 was to minimise the disruption to NESO. Unfortunately, due to the way in which milestone data is currently held in our system, it cannot easily be extracted, and we are also unable to comply with your refined request without significant effort.

FOI/25/283 covers all projects located in Scotland, England and Wales, which would include projects with existing agreements to connect at the transmission or distribution level. We have recently undertaken an analysis of a small subset of ~400 projects for another purpose and this exercise took a data scientist 5 days full time effort to extract the relevant aggregated data. There are approximately 2,300 projects in the current [TEC Register](#). Based on the recent exercise, we estimate that it would take approximately 28 days to extract aggregated milestone data for projects with an existing agreement to connect to the transmission network.

However, FOI/25/283 seeks information at an individual project level, rather than aggregated data. We would therefore need to assess the M1 and M2 information we hold for each project in scope of your request to determine if it is publicly available via local authority planning mechanisms or whether there are any commercial sensitivities. For the 2,300 projects in the TEC Register that would require review we have calculated that, at a very conservative estimate of just 10 minutes per project, this would take an additional 383 hours of staff time. We may also need to consult with the third parties in some instances.

Regulation 12(4)(b) of the EIR allows a public authority to refuse a request where the request is manifestly unreasonable. While we are in no way suggesting that your intention is unreasonable, we have determined that responding to your refined request will impose a disproportionate burden on NESO. The ICO's guidance advises that burden can be thought of in terms of cost, including the cost of staff time spent dealing with the request. However, it 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.

The exception in regulation 12(4)(b) is subject to the public interest test.

NESO is mindful that the EIR requires us to apply a presumption in favour of disclosure when considering the public interest test. There is a public interest in NESO, as a public corporation, being accountable and transparent for its activities. Disclosure of the information may increase public understanding of decision making and increase public understanding of connections and connections reform.

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. This activity would necessitate resource from NESO teams that are currently assigned to the connections reform programme. Whilst we intend to build the functionality to support such requests in the future, our priority at the time being is delivering the next stage of the connections reform programme.

Despite the presumption in favour of disclosure, the excessive burden of responding to your request means that we conclude the public interest lies in maintaining the exception in Regulation 12(4)(b) of the EIR. There is already a certain amount of information in the public domain that you could access from other sources, e.g. planning information.

We are mindful that the ICO's guidance recommends that before applying Regulation 12(4)(b) solely because of cost or burden, a public authority should consider whether it's more appropriate to rely on regulation 7(1) of the EIR to extend the time for complying with a request. However, we have concluded that an extension would not be appropriate in this case.

This concludes our response to your request.

Advice and assistance

Regulation 9 of the EIR requires a public authority to provide advice and assistance to requesters. When refusing a request under Regulation 12(4)(b) as manifestly unreasonable because of the burden or cost, there is an expectation that a public authority should provide the requester with reasonable advice and assistance to help them submit a less burdensome request.

We have carefully considered whether we are able to provide reasonable advice on how you may refine this request. The request is for a large dataset, and it is difficult for us to advise on how you may refine your request aside from suggesting that you limit the scope of the request to a small number of projects.

The current TEC Register is available here: [Transmission Entry Capacity \(TEC\) register | National Energy System Operator](#). To assist in narrowing your request to a smaller number of projects, you can filter the TEC Register by Host Transmission Owner and then add further filters by project status, plant type and/or MW effective date. If you would be interested in requesting information on projects in a specific geographic location the [Connections 360 portal](#) provides a map view of electricity network infrastructure and network capacity. You could, for example, select a group of projects based on their location, a specific plant type and MW effective date of a single year.

We do not know whether a more focussed request would meet your requirement. A request for information on a more focussed number of projects may enable us to comply with your request without it imposing a disproportionate burden on NESO to respond. It is difficult to provide a clear time estimate per project as the circumstances and records for each will differ.

There is no requirement under the legislation for you to explain the reasons for your request or how you intend to use the requested information, but if you feel able to provide some further context or explanation, this may help us to understand your requirements and assist you in further refining your request.

Should you submit a refined request relating to a significantly more discrete set of projects, we will reassess the impact on the organisation of compliance and respond accordingly.

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)