

Public

Ref: FOI/24/0032

National Energy System Operator

Faraday House

Gallows Hill

Warwick

CV34 6DA

InformationRights@nationalenergyso.com

nationalenergyso.com

14 February 2025

Dear requester

Request for Information

Thank you for your request for information which we have considered in accordance with the Freedom of Information Act 2000 (FOIA).

Request

You asked us:

This is a request for information held by NESO. It is made under the Freedom of Information Act. It concerns electricity supply and demand on 8 January, 2025.

- 1. Please supply me with the electricity Margins Reports for 8 January, 2025, listing which assets would have been available if required in the event of supply loss.*
- 2. What was the exact difference between available supply and demand at the peak on 8 January?*
- 3. What was the actual 1-minute peak demand on 8 January (rather than the half-hourly peak) – i.e. the highest instantaneous demand that had to be met?*
- 4. What was the corresponding actual available supply from generators, batteries, interconnectors and demand side response at the peak on 8 January?*
- 5. Which units exactly provided the margin by which available supply at the peak exceeded demand at the peak on 8 January?*

6. *What was the peak demand forecast at the moment when NESO cancelled the EMN issued on 8 January?*

Our response

We have re-grouped your questions for the purpose of our response. The first part of our response addresses three of your questions.

Question 1: Please supply me with the electricity Margins Reports for 8 January, 2025, listing which assets would have been available if required in the event of supply loss.

Question 4: What was the corresponding actual available supply from generators, batteries, interconnectors and demand side response at the peak on 8 January?

Question 5: Which units exactly provided the margin by which available supply at the peak exceeded demand at the peak on 8 January?

NESO systems do not retain and store data at the granularity that you are requesting, but NESO does hold some information which falls within the scope of your request.

The System Operating Plan key data points are published through the NESO data portal, this data and data glossary shows the aggregate view of the control room at the point of time of planning the system: [System Operating Plan \(SOP\) | National Energy System Operator](#).

From this, you can see the view of operating margin at each point a plan was generated which is the main tool used in margin forecasting.

The data that populates the system operating plans and margin calculations at unit level is strictly confidential and commercially sensitive as they contain non-public pre-gate closure data which was provided to NESO by third parties.

The exemption at Section 43 of the FOIA allows us to withhold information where its disclosure would prejudice the commercial interests of NESO or another party. In this case, the disclosure of the information would prejudice the commercial interests of the companies which provide the pre-gate closure data.

Data used in the generation of an Electricity Margin Notice is pre-gate closure data, (including pricing, physical positioning and dynamic capabilities of units), that is non-firm, able to change over time and is representative of the commercial positioning of units ahead of the active market window. Publishing this data risks sharing company commercial strategies with the current market.

This exemption is a qualified exemption and we are therefore required to conduct a public interest test. There is a public interest in transparency and accountability regarding the

public tasks that NESO performs and the security of energy supply. NESO also acknowledges that there is a public interest in furthering public understanding of the supply of energy, the use of renewable energy sources, and the cost of energy to consumers.

NESO has a duty under its license to facilitate competition in the energy sector, to ensure that market participants are able to compete fairly, and to ensure competitive pricing in order to reduce costs to consumers. It is not in the public interest for the market competition to be distorted by disclosures of confidential information relating to the commercial strategies of a limited number of market participants which would disadvantage them and provide a competitive advantage to other participants in the energy market. This would, in turn, be likely to result in the public benefit of having an efficient competitive market being to some extent eroded, with a knock-on effect for consumers of electricity and the security of the supply of energy.

Having weighed up the public interest arguments, on balance we find that the public interest lies in maintaining the exemption and not publishing this commercially sensitive information.

The exemption at Section 41 of the FOIA also allows us to refuse information which was provided to NESO in confidence by a third party. Pre-gate closure information is provided to NESO in confidence and under the Grid Code [The Grid Code | NESO](#). The Grid Code contains a confidentiality section at GC.12 which confers an obligation of confidentiality to other users of the Code. In our opinion, the Grid Code confidentiality requirements which form part of our licence obligations engage the Section 41 FOIA exemption. This exemption is an absolute exemption which does not require us to conduct a public interest test.

NESO is subject to the Utilities Act 2000 which contains restrictions on the disclosure of information received by NESO. Under Section 105 of the Utilities Act there is a prohibition on NESO disclosing information that we have obtained which “relates to the affairs of any individual or to any particular business”. Failure to comply with this restriction is a criminal offence. In our opinion, the disclosure of the pre-gate closure information provided by BM units, would be likely to be a breach of Section 105 of the Utilities Act. This information is therefore also exempt from disclosure under Section 44 of the Freedom of Information Act which allows us to withhold information where its disclosure is prohibited by or under any enactment. The exemption at Section 44 is an absolute exemption which does not require us to conduct a public interest test.

On 13 February NESO updated the explainer article: [What happened with margins on 8 January? | National Energy System Operator](#) with an additional dataset which records the actual outturn numbers by BM Unit (and non-BM unit holding a reserve contract). This is publicly available already via an Elexon API request and the NESO data portal for non-BM units but, as it requires understanding to use APIs and to build a picture of availability from

this data, we have published this directly. We are considering how to do this more quickly in the future.

Question 2: What was the exact difference between available supply and demand at the peak on 8 January?

This data is public, provided by Elexon, including availability via API request. The exemption at Section 21 of the FOIA (*Information is accessible to the applicant by other means*) therefore applies to this information.

Please see the following Elexon pages for published information:

[Rolling system demand | Insights Solution](#)

[Balancing Mechanism data by BMU view | Insights Solution.](#)

NESO's published explainer article also provides further details:

[What happened with margins on 8 January? | National Energy System Operator.](#)

Question 3: What was the actual 1-minute peak demand on 8 January (rather than the half-hourly peak) – i.e. the highest instantaneous demand that had to be met?

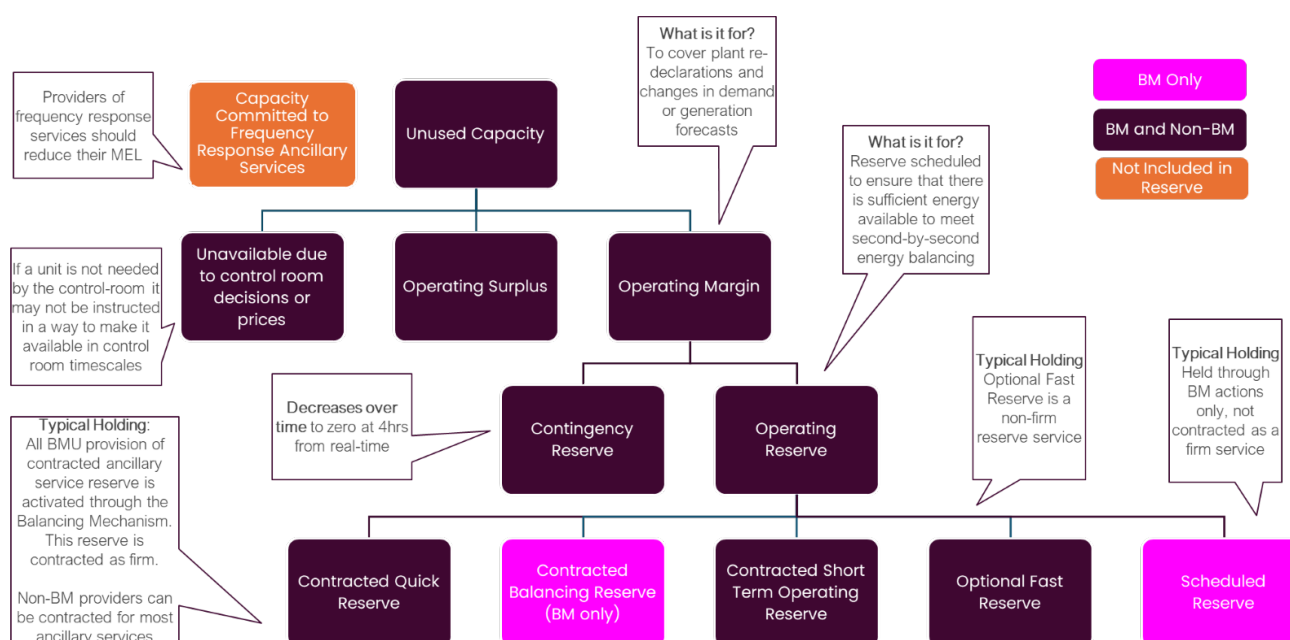
Peak **Transmission System Demand** as measured by operational metering was 46,679.6MW at 17:22:20.

Question 6: What was the peak demand forecast at the moment when NESO cancelled the EMN issued on 8 January?

You can see the Electricity National Control Centre (ENCC) demand forecasts that are used in system operating plans alongside considered reserve and generation components that inform use of an Electricity Margin Notice (EMN) here: [System Operating Plan \(SOP\) | National Energy System Operator](#) 'DP' (Darkness Peak) refers to the peak demand inflection point in the evening which was peak demand for the 8th. This includes all iterations run over time with a customer demand forecast.

In the final SOP for darkness peak on the 8th, peak **National Demand Forecast** was for 17:20 and produced at 15:24. In this document the **National Demand Forecast** was 45,576MW. As this held an operating surplus after all operating reserve requirements were met, the EMN could be cancelled. This analysis already included decisions made to allow large CCGTs such as Ryehouse to de-synchronise before this peak period, therefore removing their capacity from held operating reserve (see diagram below to interpret data).

Cardinal Point	Datetime of Cardinal Point	Total SOP National Demand Forecast	Short Term Operating Reserve	Regulating Reserve (Held in scheduled reserve + Quick Reserve + Balancing Reserve + optional Fast Reserve)	Total operating reserve held (Sum of STOR + Reg Reserve)	Operating Surplus
DP	17:20	45,576MW	1042MW	1163MW	2205MW	136MW



Next steps

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. 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)