

Public

Ref: FOI/24/0039

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13 March 2025

Dear requester

Request for Information

Thank you for your request for information which we received on 13 February 2025.

You have asked that your request be considered under the Freedom of Information (Scotland) Act 2002 (FOISA).

NESO is subject to the Freedom of Information Act (2000) and the Environmental Information Regulations 2004 (EIR). As with FOISA, both these pieces of legislation provide access to information held by NESO to members of the public. We have determined that the information requested meets the definition of 'environmental information' at Regulation 2(1) of the EIR, and your request has therefore been managed under that legislation.

Request

You asked us:

*I formally request disclosure of all documents, reports, and assessments related to the necessity of the **SSEN 400kV Overhead Line (Spittal–Loch Buidhe–Beauly)**. Specifically, I request:*

- 1. All studies demonstrating the need for this project, including **demand forecasts and capacity analyses**.*
- 2. Any alternatives considered, including **underground or subsea options**.*
- 3. Economic impact assessments showing **public benefit justification**.*
- 4. Environmental and climate impact reports used in decision-making.*

5. *Public consultation records and responses to community objections.*

In your original request you included a sixth question, requesting communications between SSEN and Scottish Government. As your request was sent to SSEN, the Scottish Government and NESO, we understood this part of your request to be directed to SSEN and the Scottish Government and not to NESO. In our email of 17 February 2025, we confirmed that, as NESO is not one of the parties named in this question, we would not be responding to this part of your request. We have not received any further correspondence from you in relation to this part of your request.

Our response

The National Grid Electricity System Operator (NG ESO) was part of the National Grid PLC group of companies until 30 September 2024. On 1 October 2024, we became the National Energy System Operator (NESO).

As NG ESO was subject to the EIR, our searches for information in response to your request have included information prior to 1 October 2024. We can confirm that NESO holds some information that meets the scope of your request relating to work undertaken by NG ESO.

The SSEN 400kV Overhead Line (Spittal – Loch Buidhe – Beaully) is comprised of two recommended reinforcements:

- Beaully to Loch Buidhe 400kV reinforcement (BLN4)
- Loch Buidhe to Spittal 400 kV reinforcement (SLU4).

The National Energy System Operator (NESO) is responsible for balancing electricity supply and demand across Great Britain and oversees the coordination of the electricity transmission network system planning processes.

The role of NESO, and previously NG ESO, in strategic energy planning is to make recommendations, which are then taken forward by the energy industry. We specify the future requirements of the transmission system, based on our Future Energy Scenarios (more information on FES is available here: [Future Energy Scenarios \(FES\) | National Energy System Operator](#)). Transmission Owners (TOs) then provide us with options to meet those requirements – sometimes only a limited number of options are provided to meet a need. We undertake an assessment, to determine the right strategic set of reinforcements for GB. NG ESO was required under its licence to recommend a network which is compliant with the relevant technical standards (such as the [Security and Quality of Supply Standard \(SQSS\)](#)) and to undertake an economic assessment of options related to the wider operation of the electricity network. At the time of the recommendations made relating to BLN4 and SLU4, some recommendations were based on system economic cost-benefit assessment, and some were driven by a compliance need to connect generation and maintain a resilient network.

The TOs, in this case Scottish and Southern Electricity Networks (SSEN), are responsible for the detailed design process for any strategic option recommended, including technical choices, routing consenting, and stakeholder engagement. It is the responsibility of the TOs to decide what, where and when they invest, and how they plan and implement their options. NG ESO did not (and NESO currently doesn't) evaluate the specific designs of any option, such as the choice of equipment, route, community and environmental impacts. These types of decisions can only be made by the TOs or other relevant parties when the options are at a more advanced stage. The precise details and routing of the options are made by the relevant TO, who need to undertake and obtain the relevant environment and land planning requirements, before the scheme can be built.

Licensed activities within the energy industry are regulated and overseen by Ofgem. Although our recommendations support needs cases, as TOs progress projects through the planning and consents processes, our recommendations have previously not had a direct legal basis in planning legislation, nor do they act as consent to construct. The [National Policy Statement for Renewable Energy Infrastructure](#) streamlines planning processes but refers to critical national priority infrastructure still being subject to legal consent requirements under planning legislation.

OFGEM decided to fund both BLN4 and SLU4 through the Accelerated Strategic Transmission Investment (ASTI): [Decision on accelerating onshore electricity transmission investment | Ofgem](#).

Documents, reports, and assessments related to the necessity of the SSEN 400kV Overhead Line (Spittal–Loch Buidhe–Beauly).

National Grid Electricity System Operator's (NG ESO) findings on network upgrades needed to meet the Government's ambition to connect up to 50GW of offshore wind generation by 2030 are published in the:

- Pathway to 2030 Holistic Network Design Report (July 2022)
- Networks Options Assessment 2021/22.

The [Pathway to 2030 HND Report](#) (July 2022) lists the Beauly to Loch Buidhe 400kV reinforcement (BLN4) as *HND Essential requiring acceleration to 2030* and identifies a new network need *essential for HND* between Loch Buidhe and Spittal (SLU4). Supporting documents for the Pathway to 2030 HND Report, including methodologies and appendices, are also available on the NESO website: [A Holistic Network Design for Offshore Wind | National Energy System Operator](#).

The [Network Options Assessment Refresh 2021/22](#) fully integrates the HND's offshore network and confirms the wider onshore network requirements. Both BLN4 and SLU4 are listed as *HND essential options* for North Scotland. They were identified as HND essential as they are works identified as required to facilitate the connection of 50GW of offshore wind by 2030 (see page 19 of the NOA Refresh linked above). Key resources and documents, including methodology reports for the NOA, are available here: [Key documents \(NOA\) | National Energy System Operator](#).

We also hold a draft Network Options Assessment (NOA) committee brief dated June 2022 that relates to the two reinforcements:

- Beauly to Loch Buidhe 400kV reinforcement (BLN4)
- Loch Buidhe to Spittal 400 kV reinforcement (SLU4).

EIR Regulation 12(4)(d) allows for a public authority to refuse to disclose information where the request relates to material which is still in the course of completion, to unfinished document(s) or to incomplete data. The information held within the paper was not tabled at a NOA Committee and the information was not part of decision making on the reinforcements. The paper was superseded by the Holistic Network Design decision making which is explained above.

All exceptions within the EIR are subject to a public interest test.

We recognise that there is a general public interest in transparency and that there is a public interest in information about the recommendations NESO, and formerly NG ESO, make for Great Britain's electricity network. We are mindful of the EIR's presumption in favour of disclosure.

NESO does not believe, however, that there is a public interest in releasing draft and unfinished data which may lead to confusion of versions and public misinformation, particularly where the draft document in question was not tabled at a NOA committee or used in the decision-making process. The NG ESO recommendations for these reinforcements are publicly available in the HND and NOA reports available on our website.

We have concluded that the public interest lies in maintaining the exception at Regulation 12(4)(d) and are withholding this draft committee report.

You also specifically requested the following information:

1. *All studies demonstrating the need for this project, including demand forecasts and capacity analyses.*
2. *Any alternatives considered, including underground or subsea options.*
3. *Economic impact assessments showing public benefit justification.*
4. *Environmental and climate impact reports used in decision-making.*
5. *Public consultation records and responses to community objections.*

NESO does not hold any further recorded information that falls within the scope of the specific records requested. Please note that the EIR state that a public authority may refuse a request where "it does not hold that information when an applicant's request is received" (Regulation 12(4)(a)) and we are not required to create or obtain new information in order to respond to an EIR request.

This concludes our response to your request.

Advice and assistance

We have provided some contextual information that may aid understanding of the role of NESO (and formally NG ESO) in strategic energy planning. We would normally advise contacting the TO as they are responsible for the detailed design process for any recommended strategic option. We are aware however that you have contacted both SSEN and Scottish Government to request the same information.

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)