

Public

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Consultation Feedback Response

Our response to comments
received in the CSNP High-Level
Principles consultation



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1. Introduction and Background

The Centralised Strategic Network Plan (CSNP) will provide an independent, coordinated, and long-term approach to transmission network planning in Great Britain (GB) to help achieve its net zero ambitions and meet future energy transmission needs.

Through the CSNP framework, we will determine the transmission infrastructure required to deliver the energy networks of the future. This will focus on the electricity network initially, with gas and hydrogen included in future iterations. This will enable a whole system perspective to help meet GB’s net zero ambition and support wider economic growth.

During December 2024 and January 2025, we conducted a consultation to gather feedback on our proposed approach for the CSNP Methodology, which was outlined in our High-Level Principles document. We are using these comments to develop the draft methodology ahead of a second consultation period in the summer and subsequently submitting the final methodology to Ofgem by the end of the year.

At the same time as the CSNP Methodology High-Level Principles consultation, NESO also held a consultation on the tCSNP2 Refresh and the SSEP Methodology. A link to the tCSNP2 Refresh document and the consultation feedback is available [here](#). The SSEP Methodology is available [here](#). The SSEP consultation feedback will be published in May 2025.

The documents were promoted on our website, through our working groups, and by a webinar open to all interested parties. A copy of the CSNP High Level Principles document that was consulted on is available [here](#). A recording of the SEP webinar is available [here](#).

The CSNP Methodology High-Level Principles consultation generated more than 50 responses from organisations across the UK. Participants included national and local governments, transmission operators, distribution networks, energy industry stakeholders and experts, interest groups, advisory bodies, and local community groups. We are extremely grateful to all the respondents, together they have provided a range of feedback and insight about our plans.

Since the consultation closed on 20 January 2025, we have reviewed all the comments we received and have continued engagement through the working groups.

This document sets out a summary of the feedback, detailing the main areas of support as well as areas for further consideration. Please be aware we will not be responding to comments made on this document, however there will be a further public consultation on the CSNP methodology later this year.

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2. Summary of Engagement

Overall, positive feedback was received for the CSNP Methodology High-Level Principles. A key theme of feedback received is that respondents want to see more granular details and explanations in the next publication, which will be published in Summer 2025.

A range of additional stakeholder types were proposed for us to consider and engage with as we continue to develop the CSNP Methodology. We are considering ways to broaden our engagement approach to make sure we are engaging with the right stakeholders at the right time, in the right way while also delivering on our objectives. We recognise that creating a nationwide transmission network plan needs to consider views from a range of stakeholders with differing levels of knowledge and perspectives on our work. We also acknowledge that insights from stakeholders both within and outside of the energy sector are invaluable to make sure the CSNP is robust, considerate of the whole energy system and is inclusive.

Although what we do is technical in nature, we are taking steps to ensure that the next document continues to be clear and accessible as it can be by presenting information in different ways such as using more diagrams and worked examples to support the technical information. We will also consider how we can present the relationship to other NESO initiatives and publications, providing clarity for stakeholders on how these work together and impact on one another.

Many suggestions and insights were shared across topics covered in the consultation document. We will carefully consider stakeholder views as we continue to refine the CSNP Methodology processes ahead of our next publication which will be published on our website by Summer 2025.

We'd like to thank everyone who participated in the consultation.

3. Environmental Considerations

Overall, the feedback we received supports the integration of a Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Plan in the CSNP. This integration is seen as essential for ensuring energy infrastructure developments have adequately assessed any potential environmental impacts.

Many stakeholders emphasised the importance of protecting and enhancing the environment in the development of the CSNP. Emphasis was placed on the need to integrate environmental assessments, such as SEA, HRA, and Marine Conservation Zones (MCZs) assessments, into the planning process and the integration of the mitigation hierarchy. The mitigation hierarchy is a principle of environmental planning which broadly states that developments should look to firstly avoid and minimise impacts on biodiversity and restore habitats and compensate losses last.

There is support for the aim to achieve net zero by 2050, highlighting that nature recovery has the potential to result in benefits for both biodiversity and climate change, as well as to local communities.

We received a number of comments about involving stakeholders, including local communities, developers, and statutory bodies in the SEA and HRA processes to ensure comprehensive and transparent assessments.

The areas of concern reflect the need for a more comprehensive and flexible approach to environmental assessments, considering both local and national factors. Additionally ensuring timely stakeholder engagement whilst considering environmental constraints, protection of designated areas, and ensuring nature recovery and biodiversity net gain.

Comments emphasised the need for more consideration of marine and environmental factors, including Marine Conservation Zones and Highly Protected Marine Areas.

We asked a question in the consultation regarding the use of quantitative as well as qualitative data in our approach to the assessment criteria when considering the environment. There was strong support for using both, with qualitative input allowing for a more rounded view and taking into consideration views expressed by stakeholders.

Our response

The proposed framework approach will allow for a high-level view of environmental and community impacts. These outputs will be shared alongside the economic assessment and the other assessment criteria; deliverability and operability to inform decision making.

The approach will balance the quantitative outputs with a substantial qualitative narrative. Providing additional qualitative information is crucial to overcome any issues due to lack of data or specificity of the solutions at the time of appraisal.

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Due to the strategic high-level nature of the CSNP, NESO will be focusing on avoidance of constraints. Compensation and mitigation is determined at the project level. We will work with stakeholders to understand the potential ways in which the mitigation hierarchy and biodiversity net gain could be facilitated through strategic plans.

The approach will be shared with stakeholders as the methodology is refined and finalised.

4. Stakeholder Engagement

Respondents felt the engagement approach and stakeholder categories were logical and appropriate and welcomed the alignment with SSEP, where possible. Most respondents proposed suggestions to expand the list of stakeholders, and the categories captured. Different communication channels were proposed by various respondents to allow for a broader range of stakeholders to help develop relevant aspects of the CSNP. Several respondents felt that the consultation timing and review period was too short and not considerate of stakeholders’ capacities to respond. Other feedback was that the documents would benefit from an increased number of diagrams and worked examples to allow the reader to better understand the information being shared.

Respondents suggested alternative methods for capturing feedback outside of consultations and working groups, although the need to balance engagement activities with stakeholders’ limited resources was also acknowledged.

Our response

As a result of the feedback, we have received we will review the way we provide information to make technical or complex information more accessible to a wider audience, such as through using more diagrams and practical examples. The draft CSNP Methodology will be published by Summer 2025 on the NESO website. We are working closely with the NESO digital team to make improvements to NESO’s structure to make it more accessible and easier to navigate.

The CSNP Methodology will expand on the High-Level Principles document and is likely be a longer publication. We recognise this needs to be understood by a range of stakeholders, not all of which are within the energy sector. Where possible, we will supplement text with diagrams to aid understanding of the narrative and new processes set out in the document.

We will continue to align with Strategic Energy Planning (SEP) engagement activities but will focus on broadening and refining our CSNP stakeholder categories, and our engagement approach to make sure we are able to capture the views of a range of diverse stakeholders so that our transmission network planning approach is considered holistically.

In the CSNP Methodology, we will provide indication when documents will be available and how you can get involved and provide feedback into the process. So, where appropriate, stakeholders can prepare resources accordingly.

We will consider the timings of our publications, coordinating with other NESO teams and proactively look at timings of other industry initiatives where possible to make sure stakeholders can prepare for consultation periods, and we can help alleviate capacity issues mentioned in the responses.

5. The Change Control Process

Responses concerning the staged change control process were mostly supportive of our proposal. Several respondents said that they would like more information regarding what this process will entail such as the timelines associated with it and how it will be applied. Clearer definitions on what is meant by a ‘material change’ and ‘trigger’ were requested. Additional triggers were proposed related to:

- changes in energy demand and generation forecasts
- technological advances
- policy and regulation changes
- market dynamics

Respondents would also like clarity on the roles and responsibilities of involved parties within the process.

Our response

The purpose of the High-Level Principles consultation was to communicate an outline of the process before we publish the CSNP Methodology in June 2025. We welcome the comments received and we will review how we can share more specific information on the change control process while ensuring it does not delay meeting net zero ambitions.

We will consider the proposed ‘triggers’ suggested by respondents as we refine the change control process ahead of the next publication.

6. Integrating an Indicative Offshore Design

There was significant support for the proposal to conduct an indicative offshore design exercise in the CSNP. Respondents felt that including an offshore design exercise follows on well from the UK Governments Clean Power 2030 Action Plan ([Clean Power 2030 Action Plan – GOV.UK](https://www.gov.uk/government/policies/clean-power-2030-action-plan)) and the

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transitional Centralised Strategic Network Plan 2 Refresh (TCSNP2 Refresh) process and ensures proactive holistic network planning. Some respondents would like to see more details before they commented further.

Although most respondents were supportive of integrating an offshore design, several respondents would like more clarity from the next publication including alignment with the Strategic Spatial Energy Plan (SSEP) and Regional Energy Strategic Plans (RESPs). Some organisations highlighted the need for the energy transition, which the CSNP will facilitate, to happen in a way that creates least impact on other offshore stakeholders that sit outside of the energy industry, and proposed that robust impact assessments are undertaken.

Some of the feedback also discussed costs and ensuring any assumptions underpinning the exercise are credible and in sync with the latest supply chain information.

There were a number of organisations that, although offering conditional support for the integration of offshore designs, want to understand if environmental and consenting risks would be considered, and if so, how. The need to ensure that onshore reinforcement plans are not disadvantaged was also shared in the feedback.

Some respondents expressed their interest in engaging with NESO to help shape the process and support our work. There were also requests to include all forms of interconnectors including offshore hybrid assets, offshore energy hubs or islands and a meshed offshore grid.

In addition to consulting on the integration of offshore designs, this chapter contained two questions on interconnectors. The first question asked whether responders agreed that identifying parameters within the CSNP will support the regulatory and the development process for future interconnector expansion.

Some respondents would like to see the range of parameters expanded to:

- include flexibility for emerging technologies
- account for floating wind, hydrogen hubs, and energy islands
- consider local economic impacts
- include metrics to evaluate regional job creation and economic benefits.

Feedback was also received from a small number of respondents asking for more clarity on the relationship between the CSNP and the following regulatory process towards enabling future interconnector expansion. As part of this we are also considering the roles and responsibilities of NESO and Ofgem going forward.

The second question asked whether the parameters were suitable, or whether any should be removed or added. Responses to this question broadly support the parameters proposed and the overall strategic approach towards considering interconnection within the strategic planning

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processes. A small number of respondents emphasised the need to embed environmental principles into the offshore exercise to ensure any consenting risks associated with environmental impact are identified at an early stage.

Additional criterion suggested included:

- community projects / local energy transition plans
- regulatory approval in the other country
- capex costs
- market forecasts
- delivery constraints

One respondent did not agree with the timelines implied by the use of an indicative Offshore design.

Our response

We are pleased that most respondents support the integration of an offshore design as set out in the High-Level Principles document. We will endeavour to address feedback received and will provide more information on how this will interact with the other strategic energy plans in the CSNP Methodology in June 2025.

NESO are working closely with Ofgem and DESNZ (the UK government’s energy department) as we develop the offshore approach for the CSNP Methodology. This is to ensure that any outputs produced by this process, such as parameters for theoretical interconnector expansion, align with wider policy objectives and regulatory processes. These parameters are:

- Connection location in Great Britain
- Connecting international market
- Capacity
- Technology type - for example point-to-point or offshore hybrid asset (OHA)
- Ideal delivery year
- System costs

DESNZ will continue to lead on wider offshore policy direction. Ofgem will continue to work through the details to understand how the regulatory process can support the delivery of projects, aligning to the strategic plan. We recognise the importance of incorporating the views of a range of stakeholders to inform our thinking and ensure any offshore designs are robust and considerate of a broad range of needs whilst supporting GB’s long-term energy targets. As with other CSNP outputs, the offshore design approach will also need to consider a range of

criteria and the strategic impact, such as environmental and community factors. We appreciate views from stakeholders on these topics. We will share a more complete and detailed view on our approach and seek feedback from all interested parties as we develop our draft methodology.

The CSNP Methodology will explain how an offshore design will be incorporated into the CSNP, including interconnectors and offshore hybrid assets (OHAs). It will also give greater detail on how coordination between offshore infrastructure can be considered, such as identifying opportunities for future OHAs.

7. System Requirements

Over half of responders were supportive of the proposed approach to system requirements. However, many additional proposals were submitted for consideration to make the approach more inclusive of:

- decentralised energy
- regional diversity
- considerate of environmental factors
- community energy
- adopting a regional approach for specific areas

Whilst some respondents provided additional proposals for consideration, some highlighted that additional analysis could add complexities and make analysis time consuming and consequently could impact the overall planning timescales.

One respondent felt the proposals perpetuate the risks of a constrained and sub-optimal approach in identifying the next round of investments, stating that a lack of view on how they would fit into overall delivery will result in a higher cost and an inefficient programme.

The consultation asked for more information from respondents to:

- enable us to learn from or align to what other infrastructure providers are doing regarding climate risk
- help identify credible extreme climate events and other high impact, low probability (HILP) events
- discuss the governance process to agree on the credible HILP events that need to be considered in the CSNP
- likely HILP events or uncertainties that could happen in the future with higher renewable production.

A range of insights were shared. Example themes included:

- wildfires

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- extreme flooding for rivers, surface water and sea-bed levels
- HILP solar events
- likely HILP events or uncertainties that could happen in the future with higher renewable production.

Some respondents added that we need to consider where resilience will be considered and within which assessment criteria of the CSNP project process.

Several respondents discussed the need for governance on HILP to help define the credibility and classifications of HILP events and the need to collaborate with other stakeholders on this topic.

Overall, feedback received emphasised the importance of having a robust process to identify extreme climate and high impact, low probability (HILP) events.

Our response

Ahead of the Draft CSNP Methodology, we will engage with stakeholders to identify the credible climate-related risks and high-impact, low-probability (HILP) events that are relevant to the CSNP. We will provide more details on how the resilience aspects will be incorporated in the detailed CSNP methodology.

We welcome the additional considerations and insights stakeholders provided and the links provided for direct access to the information.

8. Options Development

There were three questions included within this chapter. The first question focussed on the assessment criteria applicants would need to meet before progressing project options into the delivery pipeline. The criteria are referred to as high level design requirements in the consultation document.

Most respondents agreed with the proposed high-level design requirements. Some requested more clarity on the bullet points (page 42) stating they couldn't provide a conclusive view on their appropriateness because of this.

Some respondents felt the design requirements need to ensure they are designed to be technology agonistic allowing for a range of stakeholders to participate in the CSNP process. Suggestions proposed for additional considerations around the design requirements include:

- outages
- cost breakdown
- strategic undergrounding
- Earliest In Service Date (EISD)

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- hydrogen solutions
- decentralised energy

To avoid delays in the CSNP process, as the design requirements evolve, respondents proposed the need to ensure the requirements are subjective and do not introduce debate on projects.

The second question asked respondents to propose ways that can help support stakeholders without a transmission licence in proposing projects that can help address long-term network needs.

Responses varied. Overall, engaging with different non-network stakeholder types and using a range of mechanisms to facilitate knowledge of the optioneering process, and digital solutions were the key themes. Introducing clear timelines and information on decision-making criteria, and local market-based solutions was also proposed. Access to the right data to enable stakeholders to propose projects, and enhanced data sharing was also raised.

The existing NESO Pathfinder process, where a score-based matrix is used, was proposed as an approach that could allow for a broader range of stakeholders to participate.

Some proposed equal licences and funding for stakeholders.

Our response

We welcome the feedback and additional high-level design requirements suggested. As the design requirements are refined ahead of the CSNP Methodology being published, we'll consider these comments.

We will ensure the design requirements included in the next publication provide more information to ensure stakeholders can provide more detailed insights.

The feedback received will all be considered as the optioneering process evolves.

Funding and network operator licensees are managed by Ofgem. Ofgem will continue to understand how the regulatory process can support the delivery of projects, aligning to the strategic plan.

9. Assessment Criteria

This chapter of the High-Level Principles document contained ten questions. We have separated the feedback summaries and our response in the same way as the consultation document to make it easier to read.

Bringing all the criteria together

Many respondents agreed on the need to effectively integrate the assessment criteria, enhancing the robustness and transparency of our assessment process for consistent decision-making.

Some respondents who provided feedback highlighted the need for a weighted scoring approach that takes into consideration both economic and non-economic factors equally. In contrast, the need to put economic efficiency ahead of the other assessment criteria was also proposed. Many respondents emphasised the need for any weighting system to be transparent, well documented and easily understood.

The balance between assessment projects that address immediate deliverables versus long-term stability was emphasised. Some respondents felt that ideally, a project should perform well across all the criteria. Other respondents suggested that given the urgency of meeting net zero targets, economic efficiency, deliverability, and operability may need to take precedence in the short term.

Multi-Criteria Decision Analysis (MCDA) was also recommended as a viable methodology for integrating the assessment criteria, ensuring that the process is effective and transparent.

Stakeholder involvement throughout the assessment process was deemed critical, especially involving stakeholders within the energy industry and communities, to ensure that the recommendations are credible and reflective of diverse perspectives. The need to carefully manage quantitative and qualitative scorings/information was also highlighted.

Our response

We will develop an assessment framework that considers multiple criteria, incorporating stakeholder feedback where possible. Additionally, in the CSNP Methodology we will provide detailed methodologies for each criterion and outline the approach for integrating criteria into the decision-making process. We will ensure these methodologies are transparent and all criteria use robust data.

Alternatives to Least-Worst Regret (LWR)

Most respondents agreed that the ‘Least-Worst Regret (LWR) is not suitable for future transmission network planning. Many cited that LWR is characterised as being “risk-averse” and may lead to underinvestment: significant increases in electricity demand and generation as GB aims for net zero by 2050 will require decision making tools that support a greater willingness to invest. Some respondents suggested that NESO should consider quantifying the benefit of investing ahead of need to “futureproof” the network.

A range of solutions were proposed with most highlighting the need for the new approach to be futureproof and flexible, or able to adapt to new information or unprecedented changes. A few respondents suggested NESO use scenario analysis and sensitivities to ensure any decisions were suitable for potential future extreme weather events due to climate change or to allow for developments in new technologies.

Some respondents indicated that NESO should consider incorporating regional socio economic and environmental benefits in our decision making.

Outcomes of decisions from the government’s Review of Electricity Market Arrangements (REMA) was raised as an important milestone to ensure robust analysis.

Our response

Using the feedback captured from the High-Level Principles consultation, we are refining the assessment criteria. Currently, we are working closely with stakeholders in Strategic Energy Planning working groups to help make necessary changes. We will provide an update in the next Methodology which will be published in Summer 2025.

Societal Costs and Benefits

Overall, the responses indicate strong support for considering broader societal costs and benefits in the CSNP economic assessment, with an emphasis on using robust methodologies, ensuring transparency, and aligning with net-zero goals.

Some respondents supported the broadening of the valuation of benefits to include wider societal values of decarbonisation and acknowledging additional economic and societal benefits. However, there was challenge on how to quantify societal costs. Respondents also highlights that there needs to be a clear and transparent assessment methodology that demonstrates objective assessment to reassure stakeholders, particularly communities. Several respondents stated that any approach must be consistent with HM Treasury Green Book guidance.

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Some respondents suggested additional societal and economic benefits to consider including:

- inward investment
- UK security of supply including reducing reliance on imported gas
- balance of payment benefits of reducing imports (such as gas and hydrogen) and potentially increasing exports
- employment benefits
- system flexibility
- impact to consumers' bills
- reduced environmental impact

Consideration of and compliance with wider government policies and analysis and tools was highlighted.

On the proposal to remove Balancing Mechanism (BM) costs from Contracts for Difference (CfD) on final BM costs, more clarity was needed for some respondents. Others highlighted that additional costs, such as ancillary services provision need to be considered.

Our response

We will ensure that we incorporate societal costs and benefits within the CSNP. We will ensure that our assessment of these costs is undertaken using a methodology that is transparent and robust, that is as easy to understand as possible and is underpinned by robust data.

Earliest in Service Date (EISD) and Optimal Delivery Date (ODD)

Overall, the responses indicate strong support for NESO providing its perspective on optimal project delivery dates. Emphasis was placed on transparency, stakeholder engagement, and balancing economic, environmental, community, deliverability and operability elements. Respondents believe optimal delivery dates could drive equitable and effective decisions that benefit both the energy system and consumers.

Respondents felt that any analysis of the potential benefits of earlier service dates needed to cover all possible elements, such as economic, environmental, community, deliverability and operability and that there needed to be an emphasis on transparency and stakeholder engagement.

Some respondents believe that earlier delivery of projects may accelerate decarbonisation and support achieving net zero by 2050. Some respondents questioned the potential impact of delays on other projects and would like to understand the economic impact of delays on consumers.

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Some respondents expressed concern that accelerated delivery of a mature proposal with bigger economic benefits could lead to the selection of a route that may have a greater impact on the environment and communities. Other respondents emphasised the importance of selecting the right strategic option rather than attempting to accelerate other suboptimal projects.

Our response

We will work closely with Transmission Owners and other parties to ensure that the right projects are delivered at the right time by quantifying the potential benefits by analysing all available criteria. We will consider a range of potential in service dates as this aligns with the significant additional network capability required to meet net zero by 2050.

We intend to deepen our knowledge and understanding of this complex technical area so that we can provide a centralised, strategic solution.

Use of Benefits Cost Ratio (BCR) in the CSNP

Overall, the responses indicate that while BCR can be a valuable tool for economic assessment, it must be used carefully and supplemented with broader metrics to capture the full range of benefits and ensure fair treatment for decentralised energy projects. Some respondents would like more clarity to understand how the BCR would be undertaken.

Some respondents felt BCR underrepresents broader social, environmental, and resilience benefits, such as enhanced grid reliability, community empowerment, and carbon emissions reductions. Others noted that applying BCR to a single option may provide inaccurate results due to the complex interactivity between transmission upgrades in a power system, and hence BCR is best applied at the GB plan level.

Other respondents suggested a tiered BCR process, accounting for localised social and environmental benefits. Others suggested robust scenario testing, to check how benefits vary across credible scenarios. Other respondents highlighted that BCRs should be calculated in line with HM Treasury Green Book guidelines.

Our response

We welcome the feedback regarding BCR. Our previous network options assessment activities have tended to focus on Net Present Value as a key metric for decision making. We agree with many of our stakeholders that BCR could be a valuable additional tool in ensuring that the optimal mix of projects are developed. We acknowledge that care needs to be taken in using BCRs and that a robust, transparent and broad methodology must be developed that captures the full range of benefits and costs that can be applied consistently across all projects.

Separating Deliverability and Operability

Respondents support the separation as it allows for a more transparent and focused evaluation of each criterion as this approach can enhance the clarity, precision, and comprehensiveness of project assessments.

Several consultees highlight that deliverability and operability address fundamentally different challenges. Deliverability focuses on feasibility, timelines, permitting, resource availability, and supply chain constraints. Operability deals with real-time network design challenges, grid stability, etc.

Respondents note that separating the criteria can improve stakeholder communication and understanding ensuring both criteria are well-defined and transparently evaluated to support better decision-making processes.

However, a minority of respondents said splitting the criteria depends on the wider approach used for bringing together the criteria. This is because it could dilute the strength of the other criteria. They believed assessments should be undertaken at an individual option level and at a plan level.

The following factors were suggested to consider under deliverability and operability:

The consultation also asked what factors we should cover under operability and deliverability criteria. Respondents proposed:

- benefits of changing operational procedures
- workforce availability
- project readiness
- alignment with grid infrastructure plans
- realistic timelines for construction and commissioning
- supply chain and system access type criteria

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The feedback that we received in relation to Operability was that there was a need to consider system flexibility and reliability. The feedback received was that we should assess the network's ability to adapt to changes in supply and demand and to withstand and recover from disruptions, such as extreme weather events or technical failures.

In addition, there was also a suggestion that grid stability and operational efficiency was important to consider and that any options considered need to:

- maintain voltage and frequency stability to ensure continuous and safe operation
- optimise the use of existing infrastructure and resources to minimise operational costs and maximise performance.

Feedback received was that compatibility with renewable intermittency was important to ensure the network's compatibility with the intermittent nature of renewable energy sources, maintaining grid stability.

Our response

We are continuing to work with stakeholders on developing the assessment framework, we are looking to incorporating many of the suggestions into the Methodology, along with feedback that we are receiving in workshops to develop a more detailed explanation in the Draft Methodology due to be published by the Summer of this year.

10. Next Steps

To develop the Draft Methodology, we will continue to work with stakeholders involved in the Strategic System Energy Plan working groups, designed to help shape and refine content in our Draft Methodology which will be published on our website by Summer 2025. Stakeholders will get another opportunity to provide feedback on this document. More details on how to respond on the next consultation will be included in the document. The Methodology will then be further refined using the feedback received and will then be submitted to Ofgem for their approval. We will publish the final Methodology once it has been formally approved by Ofgem before the end of 2025.

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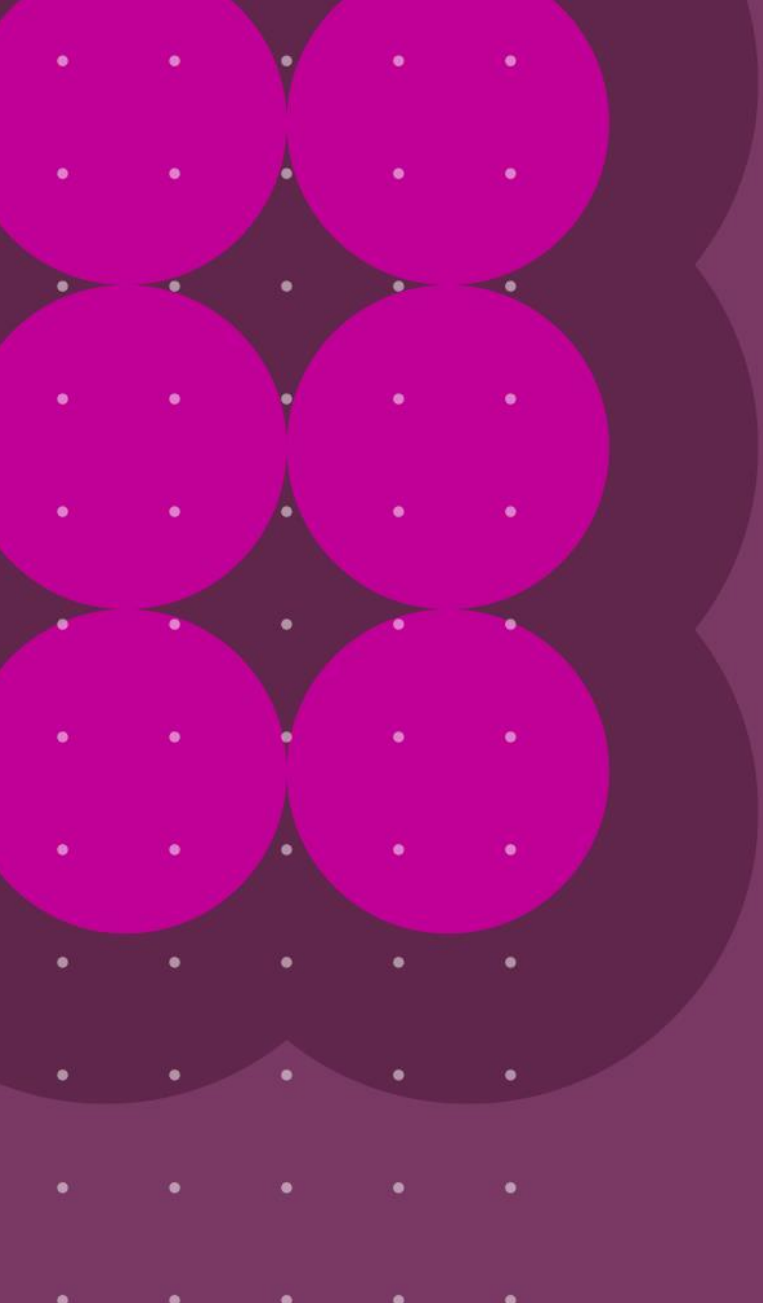
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NESO has prepared this report pursuant to its statutory duties in good faith and has endeavoured to prepare the report in a manner which is, as far as reasonably possible, objective, using information collected and compiled from users of the gas and electricity systems in Great Britain, together with its own forecasts of the future development of those systems.

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