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November 3, 2025

Dear NESO RESP team,

Response to Transitional Regional Energy Strategic Plan Consultation

Scottish Renewables is the voice of Scotland's renewable energy industry. The sectors we represent deliver investment, jobs and social benefits and reduce the carbon emissions which cause climate change. Our 360-plus members work across all renewable energy technologies, in Scotland, the UK, Europe and around the world. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can help sustainably heat and power Scotland's homes and businesses.

Scottish Renewables welcomes the opportunity to respond to the National Energy System Operator's (NESO) consultation on the transitional Regional Energy Strategic Plan (tRESP).

We fully recognise the value of NESO's efforts to clarify the role of the tRESP within strategic business planning and its implications for the upcoming price control period (RIIO-ED3), particularly given its impact on Distribution Network Operators (DNOs) and wider industry.

The consultation correctly highlights the need for transparent communication between NESO, DNOs, and industry regarding expectations and the regulatory treatment of strategic investment needs. We welcome the consultation's aim to balance the urgency of investment needs with the importance of meaningful stakeholder engagement and the integration of feedback into strategic planning.

We have not responded to your questions in detail, but we would like to draw your attention to the following key points:

Product development for final deliverables

The tRESP consultation material has been recognised by NESO as a 'work-in-progress', with a final version expected in January 2026 to support the RIIO-ED3 business planning process. The current tRESP product includes a Regions and Nations context, Pathways, and Consistent Planning Assumptions that we think are **broadly sensible but require refinement**.

The **Region and Nations context requires more detailed insights** to improve its applicability and relevance. The **Pathways and CPAs** are on the right track, but need further development to meet stakeholder expectations. **Ongoing feedback and collaboration with stakeholders will be essential** to refine these elements before the final product is released.

We understand that technical discussions regarding the Pathways and CPAs have been constructive, progressing towards a tRESP output that can be incorporated into DNO planning processes for ED3.

Clarity and development of strategic investment needs

Scottish Renewables notes that the **strategic investment needs section of the tRESP remains one of the least developed and most challenging areas for stakeholders** to interpret. The current presentation—particularly the use of greyed-out and highlighted dots on maps—lacks clarity around the assessment process and its implications for network planning. There is uncertainty about how these strategic needs are being prioritised and assessed, and how they relate to existing network assessments and initiatives. Stakeholders are also unclear about their own roles and responsibilities regarding these identified needs, which may affect their ability to plan effectively. Concerns have been raised around the potential for double-counting and overlapping efforts, especially where local energy plans may already capture similar projects. NESO has, however, acknowledged this gap and committed to improving clarity and stakeholder guidance ahead of the January update.

We welcome plans for NESO to develop comprehensive documentation and host workshops to support stakeholder understanding. Given the importance of this section in shaping future investment decisions, it is **essential that NESO provides clear criteria, guidance, and integration pathways** to ensure strategic needs are assessed consistently and transparently across the sector.

Timeline and data concerns

Scottish Renewables has some **concerns regarding the proposed timeline**, which is crucial to aligning with the upcoming ED3 business planning cycle. We consider this timeline to be very tight. While NESO has expressed confidence in delivering a fully usable product by January 2026, we are cautious about the pace of progress and the potential for inaccuracies or uncertainties in the final outputs. We question whether there is enough time for meaningful industry feedback to be adequately considered and acted upon before the final product is released, especially given the upcoming Christmas and New Year break. There is a risk that the consultation process may feel tokenistic if stakeholder input cannot be effectively integrated within such a short timeframe.

Furthermore, any slippage will impact DNOs' ability to prepare their long-term integrated network development plans as required in Ofgem's Sector Specific Methodology Consultation¹. We understand that networks are already undertaking this work, which has a lengthy timeline. Due to the timing mismatch, they've had to develop ex-post checks and reviews to integrate the final tRESP. Given the delicate moving pieces, we believe it is reasonable to ask what contingency plans are in place should the January 2026 deadline not be met—particularly in light of previous delays experienced in related areas such as connections reform. This uncertainty highlights the importance of transparency and clear communication from NESO as the process progresses.

Scottish Renewables also notes **concerns regarding the data sources currently being used** to inform the tRESP and RESP processes. For instance, during the recent Scotland RESP Forum, questions were raised about the use of the Renewable Energy Planning Database (REPD), which is

¹ [Sector specific methodology consultation: electricity distribution price control \(ED3\) | Ofgem](#)

known to have certain limitations. We are not confident in the accuracy of the data contained in the REPD, and in some cases, it reveals significant discrepancies compared to RenewableUK's (RUK) EnergyPulse database². For example, the current RESP figures for distribution-connected onshore wind in Scotland are approximately 500MW lower than the RUK EnergyPulse database indicates.

There is also a need to include region-specific data, as excluding this from tRESP weakens its accuracy, which in turn hampers local authorities' ability to make decisions and limits their capacity to address unique regional challenges and needs. For example, the north of Scotland feels particularly under- or misrepresented in several datasets and any future portal will need careful source selection to avoid reinforcing population bias, i.e., where more populated areas have more data, appear to have a greater need, and then attract more investment. NESO should explain how it plans to address gaps and data scarcity to avoid the feedback loop of data scarcity leading to underinvestment and vice-versa to ensure a Just Transition and effective policy implementation that balances supply and demand across various regions.

Within the north of Scotland, Pentland Firth and Orkney Waters more specifically, marine renewables are not adequately captured with tidal not featuring within any of the tRESP components. As part of the Nations and Regions context, tidal should be recognised as regionally important as well as being reflected within Strategic Investment Needs as the main barrier to projects such as MeyGen is grid constraints. Similarly, co-located and hybrid systems, such as Nigg and Cromarty and Firth clusters, should be considered more closely in the full RESP as these projects will be vital for providing greater flexibility and reducing reinforcement costs.

While we appreciate NESO's willingness to consider alternative data sources and its invitation for stakeholders to suggest improvements, this approach highlights the importance of ensuring that data inputs are robust, validated, and fit for purpose. **A more proactive approach to identifying and addressing data quality issues** would help build confidence in the outputs and support more effective planning. While tRESP may be a transitional prototype ahead of ED3 decisions, its publication will influence investor perception and thus, NESO must explain any data discrepancies.

Granularity of data and land cost implications

Scottish Renewables would welcome **further clarity from NESO regarding the level of granularity in the data provided** through the tRESP. Specifically, it would be helpful to understand at what geographical scale the data will be aggregated, as highly granular outputs may pose risks for generators with development projects located outside areas identified as having further capacity—for example, for onshore wind. Likewise, overly high-level outputs can also be problematic; for example, metrics like population density by council area fail to indicate large regional differences within areas such as the Highlands.

² [EnergyPulse | RenewableUK business intelligence platform](#)

Additionally, we seek **clarification on how the designation of development and non-development areas may influence land cost assumptions** within NESO's modelling. Understanding these potential knock-on effects is important for stakeholders to assess the broader implications of spatial planning outputs on project viability and investment decisions. It would also help if the full RESP ultimately includes other environmental-capacity and spatial-saturation indicators, such as cumulative pressure and restoration zones, to fully reflect both opportunity and constraint. At present, the data mostly shows development potential in isolation from environmental and social factors, which can be misleading. These factors directly affect where infrastructure can realistically be delivered, and therefore where investment is needed to enable projects and assure supply. Including these layers would make the outputs more realistic and better aligned with Scotland's planning frameworks.

Our members have flagged several suggestions to improve the tRESP data, including enhancing data accessibility by transforming static maps into a functional data portal for better stakeholder use, implementing user-friendly interfaces that allow stakeholders to easily navigate and extract relevant data and ensuring regular updates and maintenance of the data portal to reflect the latest information and insights. Presenting data at multiple scales and using normalised metrics for comparison would help capture the regional differences more clearly, especially with Scotland being treated as one RESP region. We would also encourage NESO to share how it intends to update the data and how it will align with devolved frameworks.

Stakeholder engagement and feedback will be vital in refining the product before its final release.

Interaction with Connections Reform

Scottish Renewables has **concerns that there appears to be limited alignment across NESO's various initiatives**, particularly between tRESP and Connections Reform. During the recent Scotland RESP Forum, NESO indicated that the tRESP would align with the reformed connections queue. However, this alignment is not clearly reflected in the tRESP consultation document, and with the reformed queue not expected to be finalised until early December, the timeline for incorporating this into the January 2026 tRESP outputs appears very tight. Additionally, NESO's current approach to protecting projects awaiting consent raises questions, especially as tRESP—like SSEP and CP2030—does not appear to account for projects protected under the 3a and 3b protections within Connections Reform. These projects are well advanced and could play a key role in addressing any gaps that emerge due to varying rates of attrition or technical/commercial challenges at Gate 2.

While NESO acknowledges in the consultation that tRESP will not incorporate outputs from SSEP or CSNP due to timing constraints, it remains **unclear how these initiatives will interact with one another in the longer term, and an opportunity to start working this through would be to understand how the January 2026 tRESP feeds into the first SSEP expected mid to late 2026**. Greater **clarity on how these various workstreams will be integrated** would help stakeholders better understand the strategic direction and ensure more coherent planning outcomes.

Regulatory and price control alignment

Aligning NESO's tRESP with Ofgem's price control frameworks is a key challenge that requires early resolution. DNOs are currently preparing responses not only to the tRESP consultation, but also to the Ofgem sector-specific methodology consultation (ED3), due in December 2025.

The ED3 consultation will address the regulatory treatment of strategic projects, and DNOs are encouraged to provide input to ensure that the methodology aligns with industry needs and expectations. Responses to this consultation will shape the development of business plans and strategic investments for the upcoming price control period. There is a **risk that NESO's outputs may not fit neatly into price control mechanisms**, which could impact their planning and resource allocation. **The lack of clarity on how NESO's methodologies will integrate with price control mechanisms could also delay project implementation and impede progress towards regulatory objectives.**

Regulatory frameworks will be designed to adapt to evolving technologies and market conditions, facilitating timely investments in clean energy infrastructure. Stakeholder engagement must be prioritised to gather diverse insights and ensure that the regulatory approach aligns with industry needs and public expectations. Incentives must be implemented to encourage innovation and efficiency in energy production and distribution, driving progress toward the Clean Power 2030 objectives and delivering the right outcomes for customers.

Long-term methodology and industry preparation

The enduring RESP methodology, expected to be implemented by late 2027, will replace the current tRESP approach and involve a more structured stakeholder process, starting in mid-2026. **NESO must support industry members in preparing for this shift** by engaging through working groups and communications as the RESP methodology develops, and facilitate regular working group meetings to gather insights and feedback from industry members as the methodology evolves. We think targeted communication will be needed to keep stakeholders informed about key developments and the methodology's timelines. Support materials and resources must be developed to help industry members adapt to the changes and implement the new methodologies effectively.

We think this long-term vision would reflect a shift toward a more mature, transparent, and collaborative planning process, aligned with Scotland's decarbonisation and infrastructure goals, and emphasise the importance of stakeholder engagement in shaping infrastructure projects to meet decarbonisation targets. It promotes the integration of innovative technologies and practices to enhance the efficiency and sustainability of Scotland's energy systems. The approach must **establish clear communication channels and accountability measures** to foster trust and collaboration among all parties involved in the planning process. NESO must coordinate the transition to ensure timely stakeholder engagement and smooth adoption of the new methodology.

NESO must also **develop a comprehensive communication plan** to inform stakeholders about the new methodology and its implications. Regular workshops and feedback sessions should be organised

to gather insights and address stakeholders' concerns throughout the transition process. A dedicated support team will also need to be established to assist stakeholders in adapting to the new methodology and ensure seamless integration into existing practices.

Potential implications for local planning and development

Scottish Renewables also has some **concerns around how local authorities may interpret and apply the tRESP (and future SSEP) within their local development plans**. There is a risk that spatial planning outputs could be used as a basis for objecting to or refusing consent for projects deemed to be outside the identified strategic areas or beyond the grid needs outlined in the SSEP.

Not all projects consented through the planning system will reach a final investment decision. It is also likely that capacity requirements will be revised over time with successive iterations on the SSEP. It will always be necessary to consent more projects than indicated in a strategic energy plan to accommodate this project attrition, and the need to accommodate changing capacity requirements. Consenting to additional projects is also required to maintain competitive tension in the market.

We **recommend that NESO provide clear guidance that a project pipeline greater than the capacity indicated in the SSEP and RESP is essential for the effective delivery of the plan** to avoid unintended consequences and ensure that well-developed and viable projects are not inadvertently excluded from development opportunities. NESO should develop a short section on how RESP will align with all devolved and national frameworks such as NPF4, the Marine Planning Framework, SSEP, CfD framework and Ofgem's price-control processes. In this context, it should be noted that the Scottish National Planning Framework 4 (NPF4) states explicitly that grid availability is not a material factor in determining planning applications.

Overall, we generally support this approach, but we recognise that there are still some challenges in implementing and delivering the tRESP. Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely,

Stephen McKellar

Stephen McKellar

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Scottish Renewables**