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January 16, 2026

Dear NESO RESP team,

Response to Regional Energy Strategic Plan (RESP) Methodology 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 375-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) Methodology consultation on the Regional Energy Strategic Plan (RESP).

Terminology

Do you agree that in Scotland and Wales the strategic plans outlined in this methodology should be known as the Scotland RESP and Wales RESP respectively?

- Strongly Agree

Please provide your reasoning.

We agree with NESO's proposal to use terms like RESP Scotland and RESP Wales, and to clearly distinguish between nations and regions, which is sensible and aligns with existing policy frameworks. We think that adopting this terminology should improve stakeholder engagement and communication, facilitating a more cohesive approach to strategic energy planning across the UK.

Engagement

Do you agree with our approach to engagement as we develop the RESPs?

- Somewhat agree

Please provide your reasoning.

We welcome NESO's commitment to engagement in the development of Regional Energy Strategic Plans. However, we think there is a need for meaningful engagement that enables participants to contribute actively to discussions and decision-making processes, with clear mechanisms that enable stakeholders to express their views and influence outcomes, rather than just being passive recipients of information.

There is also a need for transparency in how stakeholder input is utilised, ensuring that contributions are acknowledged and integrated into the decision-making framework. This is vital to ensure that participants can see the impact of their involvement on final decisions.

Industry must have a real voice in decision-making processes via meaningful engagement rather than high-level presentations, and we are calling for clearer communication on how data is collected, utilised and shared to ensure that all parties understand its implications and can contribute effectively.

It is worth highlighting that previous consultations, particularly those on the Strategic Spatial Energy Plan (SSEP) with industry, have often lacked transparency, leading to a lack of trust and insufficient input from industry stakeholders. NESO should explicitly specify what constitutes engagement at each phase of development and ensure greater clarity on how stakeholder feedback will be addressed and integrated into the final decisions.

We have previously raised concerns based on our experience of the t-RESP consultation process. The short timeframe between the close of consultation and publication of the t-RESP left limited scope for substantive changes in response to stakeholder input. NESO should avoid setting a precedent that risks undermining confidence in engagement or leaving key stakeholders feeling that their contributions are not meaningfully reflected in outcomes.

Local Actor Support

Do you agree with the approach we have outlined on local actor support, and how we have phased the delivery?

- Somewhat agree

Please provide your reasoning.

We broadly agree with the proposed approach to local actor support and welcome the recognition that some participants, particularly local authorities, will require additional support to engage effectively in the RESP process. Given the important role assigned to local government within the RESP governance framework, including participation across the decision-making structure, it is essential that those involved are adequately equipped to fulfil this role. While we support the phased delivery model and welcome NESO's acknowledgement of capacity and technical capability challenges, further clarity is needed on how support will be tailored to reflect the differing needs of local authorities and to ensure equitable access to resources and engagement opportunities.

We also consider it important that local authorities and community energy groups are consistently involved throughout the process, with transparent mechanisms to manage dissenting views, ensuring that all local interests are meaningfully considered. Targeted measures such as energy literacy training would help ensure decision-making remains balanced and informed by system-wide considerations, alongside appropriate opportunities for input from industry stakeholders with deep knowledge of the national energy system.

Governance

Do you agree that local authorities should be able to decide whether to send a political representative or officer to the strategic board?

- Somewhat disagree

2. Please provide your reasoning.

While we recognise the importance of local authority involvement, we believe Strategic Boards should remain politically neutral. Political representation risks introducing inconsistencies during election cycles and may disadvantage communities without locally elected representatives. To maintain neutrality, officer representation is preferable. However, the overriding priority should be ensuring that board members have the necessary expertise to make informed decisions and support the effective delivery of RESPs, given their critical role.

3. Do you agree with our proposed voting structure for strategic boards?

- Somewhat Disagree

4. If you think we should change it, please provide your reasoning.

We do not fully agree with the proposed voting structure. While we support the inclusion of local government and Ofgem's role as the ultimate decision-maker when consensus cannot be reached, the current approach risks giving local authorities disproportionate influence. Holding 50% of the vote could allow RESPs to be blocked even where there is broad support from technically informed and delivery-focused participants.

We believe a more transparent and structured voting process is needed, with greater balance between local input and cross-sector representation. Industry voices should have a higher share, particularly given the complexity of cross-sector interactions and the need for consensus to avoid conflicts.

The absence of commercial-scale renewable generation and hydrogen developers within the governance framework represents a significant gap that risks undermining effective decision-making. Currently, these developers have no direct representation on Strategic Boards and their input is limited to recommendations submitted via generator working groups rather than active participation in strategic discussions.

Local perspectives remain vital, but they should sit within a clearly articulated national framework to ensure decisions reflect system-wide needs and enable the timely delivery of nationally significant energy infrastructure.

5. Do you feel any changes should be made to the proposed terms of reference?

- Yes

6. Please provide us the details.

We welcome NESO's proposal for Strategic Boards and Working Groups and are broadly supportive of the proposed terms of reference but think that additional clarity is needed in several key areas to ensure effective and transparent governance.

First, transmission, gas and heat networks need to be explicitly included within these arrangements. Strategic planning increasingly requires a 'whole-system' approach and NESO should clarify how transmission, gas and heat network perspectives will be represented and inform RESP development.

Second, the interactions between Strategic Boards and Working Groups require clearer definition. The terms of reference should set out respective roles, escalation routes and decision-making responsibilities to avoid duplication or gaps in oversight. For example, while the framework sets out a staged approach focused on resolving disagreements at working group level, it is unclear how situations will be handled when consensus cannot be reached at strategic board level, particularly when regional and national priorities diverge. Although Ofgem has been identified as the final decision-maker, there is currently no clarity on when matters would be escalated to Ofgem or on the timescales for reaching a final decision. A defined, time-bound conflict resolution process is therefore needed, including clarity on when issues will be referred to Ofgem and when decisions can proceed without meeting consensus thresholds. Clear timelines are essential to prevent further delays and ensure unresolved disagreements do not materially impact RESP delivery.

Third, while the RESP end-to-end process indicates that Strategic Boards will be engaged throughout RESP development, the terms of reference do not clearly define the Board's role at each stage. NESO should update the terms of reference to specify the Strategic Board's responsibilities across each phase of RESP delivery. Clear definitions are essential to address past data-transparency challenges and ensure that issues are not carried forward into later stages of RESP development.

We are also concerned that data oversight is not clearly addressed. While Working Groups will not scrutinise or approve datasets, it is not explicit whether this responsibility sits with the Strategic Board. Given data transparency challenges during the SSEP, we consider it essential that the Strategic Board has a clear role in scrutinising and where appropriate, approving key datasets.

Finally, NESO should be clearer about what information from Strategic Board discussions can be shared externally. Lessons from the SSEP highlight that excessive confidentiality limited wider industry engagement and the ability to draw on 'on-the-ground' project knowledge. We therefore ask that NESO commit to sharing meaningful summaries and feedback from Strategic Board meetings with the wider industry.

7. Do you agree with our proposals for appointing members of the strategic boards?

- Neither agree nor disagree

8. If you think we should change it, please provide your reasoning.

We think greater clarity is needed on the criteria and methods for selecting board members. The current proposals are too vague and risk bias in the selection process. NESO appears to hold responsibility for appointing cross-sector actors, yet there is no clear indication of which industries will be guaranteed representation. Given that Clean Power 2030[1] (CP30) references a wide range of players—from data centres to gigafactories—it is essential that NESO sets out a transparent approach that ensures diverse representation across sectors and regions. We also recommend regular updates and feedback mechanisms to maintain accountability and openness in the targeted application process.

9. Do you agree with our proposed design for working groups?

- Somewhat Agree.

10. If not, what changes would you propose and why?

We welcome the proposal to establish technical working groups as part of the RESP governance framework, but consider that further clarity and coordination are required to ensure they operate effectively.

The technical working groups should ensure appropriate representation from a range of local interests to reflect regional and national circumstances and to address regional disparities effectively. NESO should also establish clear coordination mechanisms to support communication and collaboration among working groups across different regions and nations. Regular reviews of the groups' effectiveness and their ability to adapt to changing regional needs will be essential to ensure the arrangements remain fit for purpose.

Greater clarity is also required on the purpose and scope of the technical working groups. In particular, the methodology should explain how the role of each group will evolve across the different stages of RESP and how the working groups will interact with one another and with other governance bodies. While the methodology includes a generic term of reference, it should also highlight where roles, remits, or outputs vary between groups. Once this clarity is provided, it will be easier to assess whether the proposed membership and meeting frequency are appropriate.

[1] Clean Power 2030 Action Plan - GOV.UK

In addition, we would welcome further details on how NESO intends to manage potential stakeholder fatigue, particularly given the proposal for up to four working groups in each region or nation running in parallel.

Finally, we encourage NESO to explore the introduction of a cross-regional modelling steering group, covering all RESP regions and nations. This group should interface with the SSEP modelling team to promote consistency, transparency and coherence in the modelling assumptions and methodologies applied across RESP.

11. Do you agree with the proposed representation for the GB Steering Committee?

- Somewhat agree

12. If not, are there other participants you feel we should consider?

We support the proposal to establish a GB Steering Committee that brings together policy, delivery and stakeholder perspectives from across the energy system. While the proposed representation provides a positive starting point, it is important that NESO clearly sets out how members will be selected to ensure the committee is genuinely representative and capable of providing effective strategic oversight. We believe the committee would be strengthened by the inclusion of a broader range of stakeholders, including representation from both local and national government bodies, to ensure alignment of strategic objectives across different levels. In addition, representation should reflect the full range of views across the energy system, including network users and operators and strike an appropriate balance between regional and national perspectives. The effectiveness of the GB Steering Committee will ultimately depend on its ability to facilitate meaningful collaboration between industry, regulatory authorities and government, ensuring that diverse perspectives are heard and inform strategic planning.

Nations & Regions Contexts

1. Do you agree with the approach for the Nations and Regions Contexts?

- Somewhat Agree

2. Please provide your reasoning.

We consider the approach to incorporating Nations and Regions contexts appears to be sensible and we particularly welcome the shift from the transitional RESP (t-RESP) to include additional data gathered from local actors. This is an important improvement, as it helps capture issues unique to specific RESP nations or regions.

However, we note that data availability and granularity can vary significantly between regions, which may affect the level of detail incorporated. It is essential that these differences do not inadvertently

influence the Strategic Infrastructure (SI) needs case, given that inputs from Nations and Regions contexts form the initial basis for this assessment. Clear acknowledgement of variations in data resolution and appropriate adaptation of methodologies will be critical.

Data is a core component of the Nations and Regions Contexts, with SSEP outputs forming a key initial input to RESP. We continue to have concerns about data accuracy and transparency within the SSEP, which must be addressed, given that these outputs will directly inform RESP development. Robust governance, quality assurance and transparency arrangements for SSEP data are therefore essential to avoid reproducing errors into subsequent RESP stages. There is also a need to include region-specific data, as its absence weakens accuracy and limits local authorities' ability to address unique challenges. For example, the north of Scotland is often underrepresented in datasets, and any future portal must avoid population bias, where more populated areas attract more investment. NESO should clarify how it will address data gaps to prevent a cycle of scarcity and underinvestment, ensuring a Just Transition and balanced policy implementation. Notably, marine renewables in the Pentland Firth and Orkney Waters—such as tidal—are not adequately captured in RESP components.

Several interactions between the SSEP and RESP are unclear. For instance, it is uncertain whether the capacity of generation expected to connect at the distribution level or the transmission level will be specified by the SSEP. Additionally, it is unclear if the boundary will be permeable (as was the case for solar in CP30) or if the capacity balance will be at least partly determined through a bottom-up approach by the RESP. We would appreciate further clarification on how this will be established. Consequently, it remains unclear how projects advancing through the connection queue and the RESP will interact.

Finally, coherence between RESP and SSEP methodologies is essential to avoid differing approaches emerging across NESO teams. While we recognise that this methodology is more mature than the t-RESP and regularly references the SSEP, ensuring practical alignment will be key to delivering consistent and robust outcomes.

3. How do you envisage using the Nations and Regions Contexts and what would make the output work best for your needs?

Without greater clarity on the nature of the outputs, it is difficult to determine how to make them easier to use or understand.

Pathways

1. Do you agree with the scope of 'Whole Energy' for RESP Outputs?

- Somewhat agree

We support NESO's recommendation that the 10-year short-term pathway and multiple 25+ year-long-term pathways must cover credible routes to net-zero and include a counterfactual slow-decarbonisation scenario. The short-term plan must include immediate, practical steps to be taken within the next 10 years which support reaching the net-zero emissions target, and the various long-term plans should also be flexible enough to adapt to future uncertainties in energy demand and technological progress.

The inclusion of a counterfactual slow-decarbonisation scenario, serving as a benchmark to assess the effectiveness of proposed strategies and to emphasise the consequences of inaction, is also welcomed. The pathways should support a comprehensive energy-planning approach by integrating distribution networks into the existing framework—improved coordination between distribution and transmission systems will be vital to prevent potential bottlenecks at boundary points. Any wider risks, beyond failure to meet the net-zero target associated with this pathway, should be noted.

2. How do you envisage using the RESP Pathways and how can we communicate pathways to support you to use them effectively?

Without greater clarity on the nature of the outputs, it is difficult to determine how to make them easier to use or understand. However, our understanding is that RESP pathways will primarily serve as a guide for investment decisions. To ensure usability and avoid creating additional burden, data sharing for each proposed pathway should be provided in an industry-friendly format that allows quick translation and integration into existing processes.

3. Do you agree with the approach for the RESP Pathways?

- Somewhat agree

4. If not, please provide your reasoning.

We broadly support the proposed approach to the RESP Pathways but consider that further clarity and supporting detail will be needed to build confidence in their practical application. In particular, we think there is a need for well-developed case studies to demonstrate how the pathways would be implemented across different regional and network contexts, and how they would operate in practice to inform planning and decision-making.

We also emphasise the importance of clear communication around the expected outputs, outcomes and indicative timelines for the pathway development process. Continued and meaningful engagement with local actors will be essential to ensure the pathways accurately reflect regional needs, constraints and complexities and to secure buy-in.

Finally, while we welcome NESO's openness to alternative data sources and its invitation for stakeholders to suggest improvements, this reinforces the importance of ensuring that all data inputs are robust, validated and fit for purpose. A more proactive approach to identifying, addressing and clearly communicating data quality issues would help build confidence in the resulting outputs and support more effective and credible planning overall.

Consistent Planning Assumptions (CPAs)

1. Do you agree with our prioritisation approach and criteria set out to evaluate the validity of the Consistent Planning Assumptions values?

- Somewhat disagree

2. Please provide your reasoning.

While we recognise the intent behind the CPA process to provide a standardised framework for evaluating network impacts, greater clarity is needed on the criteria and data underpinning these assumptions to avoid misinterpretation. Collaboration among industry participants is essential to ensure assumptions reflect real-world conditions and diverse regional needs. We also have concerns regarding the accuracy and reliability of NESO's RAG rating system for consistent planning assumptions (CPAs). A transparent process for updating and validating these ratings, supported by collaborative reviews between NESO, network operators, and developers, is critical to maintaining stakeholder confidence and enabling effective decision-making.

Do you agree with our approach for the Consistent Planning Assumptions?

- Somewhat agree

4. Please provide your reasoning.

We somewhat agree with the proposed approach to Consistent Planning Assumptions (CPAs) and welcome some elements of the methodology. We agree that multiple half-hourly profiles for flexed and non-flexed behaviour are needed and that reactive power should be considered, as not all technologies will operate at unity power factor. Further guidance on assumed power factors or reactive profiles would support consistency. We support the use of parameter ranges to reflect efficiency and technology uptake, as well as geospatial analysis at the licence-area level, noting that greater granularity could create inconsistencies if RESP areas are not well aligned. We also agree with the need for clear methodology and application guidance, such as a workbook or user guide, to support consistent interpretation and use of CPAs across stakeholders.

Some larger developers may consider CPAs at transmission and larger-distribution levels to be of greater practical value than more localised assumptions. Transmission-level CPAs provide clearer visibility on how generation technologies such as onshore wind and solar are modelled and can therefore offer more meaningful signals for both future generation and demand development.

In principle, we agree that CPAs should enable Distribution Network Operators to model demand consistently and remove ambiguity arising from different modelling approaches across DNOs. However, our review of the CPAs proposed through the t-RESP consultation suggests that, in practice, these assumptions are largely GB-wide rather than regionally specific, and do not adequately reflect local weather or climate impacts.

We would welcome further clarity on how geographic variation within CPAs will be implemented, given the current GB-level approach in t-RESP. Greater transparency on how regional differentiation will be introduced and applied would increase confidence that CPAs provide locally meaningful inputs to RESP development. Additionally, this locational variation should be considered when determining whether CPA refreshes are needed under the three-year cycle, particularly for RESP areas that may evolve faster than expected. This is also relevant to the broader question of update frequency, as timely adjustments will be critical to maintaining accuracy and usefulness

Spatial Context

1. Our preferred approach is to move the RESP delivery dates back to enable option 2 (page 78). Do you support this approach and are there any other wider factors we should consider?

- Yes, we agree with the approach.

2. Do you agree with our proposed approach for the Spatial Context?

- Somewhat agree

3. Please provide your reasoning.

We somewhat agree with the proposed approach to Spatial Context development, as set out in the consultation, recognising that NESO has identified two approaches for developing the Spatial Context: the use of NESO-derived indicative peak demand or the use of detailed DNO demand calculations, with NESO expressing a preference for the latter despite potential timeline risks. We support the preferred approach of using detailed DNO demand calculations, as this will provide a more accurate and robust assessment of peak demand across regions. While this approach may extend the timeline for publishing the RESP, we consider the improved data quality and reliability to outweigh the risks associated with delay. By contrast, we have concerns about the use of indicative peak demand, which, while quicker to produce, may lack the granularity and robustness required to support effective strategic planning and investment decisions.

We think that the proposed Spatial Context will add value by providing stakeholders with information that is easy to view and compare across licensees and energy vectors, helping to identify areas of potential wider system constraints. However, it will be essential that the purpose and limitations of the Spatial Context are clearly communicated to stakeholders to avoid confusion. In particular, where RESP projections of supply and demand do not align with the current contracted position against which customers receive connection offers, this distinction must be clearly explained.

In addition, we encourage NESO to use the Spatial Context to highlight headroom and constraints at the transmission–distribution interface. These interfaces can be a critical capacity-limiting factor for distribution networks. While it is not appropriate for DNOs to publish capacity information on the upstream transmission network, this interaction should be explicitly factored into NESO's methodology for Spatial Context development.

4. How do you envisage using the Spatial Context output and how can we communicate the output to support you to use it effectively?

Without greater clarity on the nature of the outputs, it is difficult to determine how to make them easier to use or understand.

Strategic Investment Need

1. Do you agree with our description of the three types of complexity and the examples indicated?

- Somewhat agree

2. What additional considerations should we take to categorise complex strategic energy needs. Please provide your reasoning.

Specification of Strategic Investment Need and Network Planning Assurance

While we recognise the value of NESO's criteria—timescale, geographic scope and trade-off complexity—we consider that greater clarity is needed on what constitutes "complexity" in practice. Without clear guidance, the requirement to meet all criteria risks inconsistent interpretation across regions, potentially leading to uneven investment and planning outcomes. Regular engagement between NESO and Distribution Network Operators (DNOs) will be essential to ensure consistent application of these classifications.

We also see merit in explicitly recognising technology complexity as a further consideration, building on existing uncertainty around technology maturity. Emerging technologies can create additional challenges for networks in assessing system impacts and for developers in securing investment. Treating such projects as Strategic Energy Needs could help unlock investment by increasing investor confidence and giving networks time to study and plan for their impacts. This would align with NESO's Project Designation Methodology[2] and help ensure consistency between transmission- and distribution-level planning.

Finally, categorisation should clearly align with the outcomes of Connections Reform, ensuring that projects recognised as strategic through national processes are supported through the full RESP framework at distribution level.

3. What further considerations should we take as we develop the approach for specifying and categorising Strategic Investment Needs to ensure consistent regulatory treatment of network investments? Please provide your reasoning.

Currently, the step-by-step SI needs process relies on data from the nations and regions' contexts as its only initial input. While this provides a reasonable starting point, it risks overlooking energy needs

[2] Project designation | National Energy System Operator

that are highly significant at the national level but less so regionally. Also, alignment between SI Need specification, the ongoing Connections Reform and other regulatory frameworks is crucial to avoid duplication or gaps, thereby enabling coordinated investment and delivery across the full RESP framework.

Greater consideration should also be given to conflicting workstreams when identifying strategically important projects. We understand that DESNZ is working to specify and categorise Strategic Demand and to develop the Connections Accelerator Service (CAS). Further attention should be paid to the interaction between SI Need and DESNZ's strategic demand

In-Development Register

1. Will commercial sensitivities discourage you or other stakeholders from contributing to the in development register?

- Maybe

2. What measures could help build confidence in sharing information?

We recognise that commercial sensitivities can deter stakeholders from sharing data, which risks weakening the evidence base for strategic planning. To address this, we recommend that data requests prioritise aggregated and anonymised datasets, supported by clear, plain-English guidance on what is considered commercially sensitive in each context. Alternatively, NESO could adopt the approach taken by DESNZ and implement Non-Disclosure Agreements (NDAs) for sensitive data.

Confidence in data sharing can be strengthened through transparent communication on how data will be used and protected. We also encourage NESO to make greater use of established industry databases, such as RenewableUK's Energy Pulse Database[3], to reduce duplication and support collaboration.

Recent processes, including the NESO Demand Call for Input[4], highlight the importance of closing the feedback loop by clearly explaining how submitted data will inform future decisions. Finally, sharing information should be efficient and not create unnecessary burden; early clarification on data formats and the use of pre-determined templates would be beneficial for all parties.

Technical Coordination

1. What examples of whole system optimisation opportunities are you aware of and what considerations should we take to identify, prioritise and develop these collaboratively with you?

[3] EnergyPulse | RenewableUK business intelligence platform
[4] Demand Queue Call for Input (CFI) | National Energy System Operator

Network Planning Assurance

1. Do you support the selection of option 2 (page 156) as delivering best value in assuring alignment?

- Neutral

2. If not, please provide your reasoning.

The Network Planning Assurance model emphasises the importance of using detailed data from Distribution Network Operators (DNOs) to ensure accurate assessments. This approach must facilitate timely decision-making in the RESP process while maintaining alignment with network requirements. There is a need to ensure that the iterative assurance process fulfils regulatory requirements while allowing adaptive responses to changing operational conditions and stakeholder needs.

Ongoing collaboration between NESO and DNOs is essential to refine planning assumptions and enhance data accuracy over time, supporting timely decision-making by reducing bureaucratic delays and thereby enabling quicker implementation of necessary network investments and improvements.

3. What further considerations should we take as we develop the approach to Network Planning Assurance for gas distribution networks?

- Somewhat agree

4. **Please provide your reasoning.**

Gas distribution considerations

We agree that further considerations are needed as the Network Planning Assurance (NPA) framework for gas distribution networks is developed. Our overall observation is that the proposed approach for gas appears comparatively light-touch compared with the scope and depth of planning assurance being developed for electricity networks.

As gas distribution networks face increasing uncertainty—driven by decarbonisation pathways, changing demand profiles and the potential role of hydrogen and other low-carbon gases—it is important that planning assurance arrangements are sufficiently robust to test strategic assumptions and investment decisions. This lighter-touch approach risks under-scrutinising long-term planning choices at a time when strategic clarity is most needed.

In particular, we consider that there would be value in:

- **Greater transparency** around the assumptions used by gas distribution networks on future demand, decarbonisation pathways and regional variability.
- **Clearer alignment** between gas network planning, wider energy system planning and the planning assurance frameworks being developed for electricity networks, to ensure coherence across vectors.

- **Stronger assurance mechanisms** to ensure proposed investments remain appropriate under a range of credible future scenarios, including reduced gas demand or accelerated electrification.

As the energy system becomes increasingly integrated, we believe Network Planning Assurance for gas should evolve to provide a level of scrutiny and strategic alignment more comparable to that of electricity networks, while remaining proportionate to the scale and nature of future gas system use.

Societal Considerations

1. Do you agree with our approach to societal considerations? What additional considerations should we make on PSED (public sector equality duty) as we develop the RESPs?

- Somewhat agree

2. Please provide your reasoning.

We broadly agree with the proposed approach to societal considerations, but consider that further refinement is needed to fully meet Public Sector Equality Duty (PSED) requirements within the RESPs. In particular, it is essential to incorporate local community perspectives throughout the planning process so that RESP outputs reflect the diverse needs and values of different populations. Clearer, more accessible communication on the environmental impacts of proposed strategies, including potential trade-offs and benefits for local ecosystems, will also be critical to support inclusive engagement.

Finally, we see a strong need for NESO to establish mechanisms for ongoing community feedback, rather than one-off engagement, to ensure RESP outputs can adapt over time to changing societal expectations and environmental conditions, and that equality considerations continue to be given due regard as plans evolve.

Environmental Approach

1. Do you agree with our proposed environmental approach?

- Somewhat agree

2. Please provide your reasoning if you think we should be doing this differently

While we broadly support the proposed environmental approach, we consider that further refinement is needed to ensure RESP outputs fully reflect local and regional considerations. This is in line with our response to the above question on Societal Considerations.

Digital & Data

1. Do you have any observations or suggestions on our proposed approach to managing RESP data?

Industry has concerns that recent delays to the SSEP timeline could extend the RESP process, and that reliance on detailed data from DNOs may require additional analysis time, potentially impacting the overall RESP delivery schedule. Clarity is needed now on how the integration of new SSEP data will be managed to avoid further disruptions to the RESP timeline. Data quality and management will be essential for RESP's credibility and prompt delivery, highlighting the need for timely data updates to maintain accuracy and relevance in planning and decision-making. The three-year cycle allows for the inclusion of significant shifts in energy demographics and market conditions, thereby strengthening the reliability of the RESP outputs. Regular updates will help reduce risks posed by outdated data, especially amid evolving energy policies and technological progress.

However, we have concerns that delayed data updates could significantly delay the RESP process, mirroring issues experienced with the SSEP. We think it is important to establish fixed publication dates to ensure the timely delivery of updates and avoid uncertainty. Without these strict timelines, industry may be caught in a recurring cycle of postponements that could hinder progress.

Building confidence in data sharing can be achieved through clear communication about how data will be used and protected, ensuring stakeholders feel secure in their contributions. We encourage the use of established databases, such as the aforementioned RUK Energy Pulse Database, to facilitate access to reliable data and foster collaboration among industry players.

Clear communication of assumptions underlying the data assessments is essential to enable stakeholders to challenge and validate the findings. Establishing a robust framework for data quality and criticality will enhance trust among stakeholders and improve the overall effectiveness of the RESP process.

2. How frequently do you believe data refreshes should occur to ensure the RESP remains accurate and useful? What criteria should trigger a data refresh?

Please provide your reasoning.

We do not believe it is appropriate to set a fixed timetable for RESP data refreshes; instead, updates should be triggered by material changes to the evidence base. In particular, data should be refreshed following the Gate 2 offer issuance and acceptance under Connections Reform, as these milestones provide greater certainty on project progression and materially affect regional network needs.

Demand assumptions will also be critical to RESP accuracy and should remain flexible to reflect policy and methodological changes, including those arising from Ofgem's recent guidance on the treatment of demand[5] and NESO's related Call for Input. An event-led approach to data refreshes will therefore

[5] Demand connections update | Ofgem

ensure RESP outputs remain relevant, accurate and aligned with the latest system and policy developments.

1. Overall, do you agree with the approaches proposed across the RESP methodology?

Are there any elements of the methodology that you would like to see in more detail?

Strategic Plan Interaction and Connections Reform Concerns

We would welcome substantially more detail on how the RESP methodology interacts with other strategic plans, particularly the Strategic Spatial Energy Plan (SSEP) and Connections Reform, as current uncertainty is creating significant concern across industry.

Recent delays to the SSEP timeline, combined with limited clarity on how RESP modelling will interact with the reformed connections queue, risk undermining confidence in the planning framework. It is essential that industry clearly understands how RESP outputs are informed by, and feed into, connections reform outcomes—particularly to avoid unintended delays to project timelines and inefficient allocation of network and developer resources. Without this clarity, there is a risk of misalignment between strategic planning assumptions and the reality of the reformed queue.

Connections Reform will have a material impact on spatial and strategic planning, influencing which projects progress, where capacity is required and the timing of network reinforcements. These impacts must be explicitly reflected within RESP methodologies. Failure to do so risks RESP outputs being based on outdated or incomplete assumptions, reducing their value as a strategic planning tool.

For example, our understanding is that delays to SSEP delivery may push back updated views of the connections queue by at least one year. This could hinder timely decision-making for developers, networks and investors, particularly if RESP outputs continue to rely on outdated Future Energy Scenarios (FES) or queue data. Inaccurate or lagging data increases the risk of misinformed strategies, inefficient network investment, higher project costs and delays arising from unforeseen technical or capacity constraints. Investor confidence may also be affected where planning uncertainty and data gaps persist.

Furthermore, there is a lack of clarity regarding how the RESPs will reflect real-world changes to projects. It is not clear how RESPs will be updated in response to factors such as routes-to-market results (Contracts for Difference, Capacity Market, Hydrogen Allocation Rounds, etc.), Financial Investment Decisions taken, or projects being abandoned. In general, there is little information on how RESP development will interact with key policy development in DESNZ.

There is therefore an urgent need for a clear articulation of how data dependencies, assumptions, and updates are managed across SSEP, RESP and Connections Reform, alongside definitive, aligned timelines for these processes. Improved coordination and communication will be critical to avoiding cascading delays, reducing the burden of overlapping consultations, and ensuring that strategic, spatial and connections planning operate as a coherent and integrated system.

Treatment of near-term uncertainty

Although there will be multiple pathways in the longer term to manage uncertainty, it is not entirely clear how near-term uncertainty regarding generation/hydrogen development in each RESP region will be managed – it is natural for not all projects that begin their development journey (both for generation and demand) to reach Commercial Operation Date. It is important to understand how this uncertainty will be handled. For example, how will this be reflected in the "in development register"?

Recognition of Tidal Stream Energy with RESP

We would like to reiterate the importance of including tidal stream energy in the scope of the RESP. Within the north of Scotland, Pentland Firth and Orkney Waters more specifically, marine renewables are not adequately captured. 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.

Consultation Timing and Request for Extension

We would also like to express our disappointment that our request for an extension to the consultation deadline was not granted. While we fully recognise that the RESP consultation runs from November 7, 2025, to January 16, 2026, the timing has coincided with significant industry focus on the outcomes of NESO's connections reform[6], published on December 8. This has understandably absorbed member resources and attention.

This challenge has been compounded by NESO's announcement[7] on November 20 regarding the re-run of SSEP modelling and revised delivery timelines, which adds further complexity for stakeholders. Given these circumstances—and the fact that two weeks of the consultation period also fall over the festive season—we had requested a short extension as a gesture of goodwill. Unfortunately, this was declined without explanation, which is regrettable considering the competing demands on industry at this critical time.

Interaction between the RESP and grid plans

Given the need for DNOs to align their grid plans with the RESP, it is unclear how the risk of ongoing redesign will be managed. That is, the risk that the three-yearly publication of the RESP could result in a three-yearly redesign of the network, potentially causing significant delays to connections.

Interaction with Future Energy Scenarios (FES)

It is noted that the RESP covers more technologies than the SSEP and data gaps will be filled using the FES. However, it is not specified which FES scenario will be utilised or how its interaction with total capacity targets will be managed.

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[6] NESO implements electricity grid connection reforms to unlock investment in Great Britain | National Energy System Operator
[7] download

Geographic granularity

We note that new onshore wind farms or biomethane supply may occur at a lower spatial granularity than locations of electric vehicle charging points. Greater clarity on this level of granularity would be welcomed. Specifically, will the RESP identify individual projects that are proceeding, or will it focus on broader geographic areas within each RESP region? Clear guidance on this point will help stakeholders understand how the Spatial Context will be applied and how it can inform investment and planning decisions.

Empowering Ports for Scotland's Clean Energy Future

Ports are not only gateways to international trade, but they are also emerging as key enablers of Scotland's clean energy future. As ports around the country prioritise electrification and seek to attract new tenants, such as manufacturers, they face numerous challenges, including economic feasibility, grid capacity and environmental impact.

Shore power is a critical enabler of port decarbonisation, allowing maritime infrastructure to actively participate in the clean energy transition by reducing at-berth emissions, which on average account for approximately 16% of a vessel's carbon footprint. This proven solution also improves local air quality and eliminates noise and vibration from auxiliary engines—benefiting both port communities and maintenance teams. Despite its benefits, the uptake of shore power remains limited due to several challenges, including high upfront capital costs, high electricity costs, limited demand from vessels and critically constrained energy network capacity.

In addition to vessel shore power, many ports are working to modernise and improve their power supply, as well as decarbonise their activities by investing in electric vehicles and solar panels. The use of micro-grids and batteries is also emerging. Research by BPA suggests that 70% of UK ports are already at or near their capacity limit in terms of available power from the grid, with other ports worldwide experiencing similar issues.

Another crucial factor in ports' power demand is their role as a base for supply chain businesses, including manufacturers. To host large tenants and continue to attract inward investors, grid capacity must be available for these industrial centres, enabling them to facilitate local economic activity through suppliers looking to locate in strategic, coastal business hubs.

To further understand barriers to grid capacity and provide ports with the power they need to operate, electrify and expand to deliver critical renewable energy activities, as well as attract key manufacturing inward investors, Governments should recognise ports' position as nationally significant to energy infrastructure as well as strategic planning and must therefore prioritise their grid connections for both generation and demand.

Overall, we generally support this approach, but we recognise that there are still some challenges in implementing and delivering the RESP. 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