



Email to: strategicplanning@ofgem.gov.uk

4th September 2025

Dear Strategic Planning Team,

Draft Centralised Strategic Network Plan Guidance

ScottishPower Renewables (SPR) welcomes the opportunity to respond to your consultation on Draft Centralised Strategic Network Plan Guidance.

SPR is a leading developer of renewable energy generation, with over 3.1 GW of operational renewable capacity across over 40 sites using onshore wind, offshore wind, solar and battery technologies. SPR has ambitious growth plans to expand its existing onshore wind portfolio and to invest in large scale solar deployment and innovative grid storage systems including batteries, with future connections planned at the distribution network level as well as the transmission system level.

ScottishPower is fully supportive of the UK Government's ambitious targets to decarbonise the power sector by 2030 and achieve Net Zero by 2050. In this context we have been supportive of Ofgem and the Government's work to establish the National Energy System Operator (NESO) and give it a mandate to deliver strategic energy planning at national and regional levels.

We welcome the development of the Centralised Strategic Network Plan (CSNP) as a vital mechanism to coordinate strategic investment across electricity and gas networks. We broadly support the proposed framework and guidance, particularly its emphasis on whole-system planning, transparency, and stakeholder engagement.

Should you have any questions regarding any aspect of this response please do not hesitate to contact me.

Yours sincerely,

Deborah MacPherson

UK Grid Connection & Policy Manager

Draft Centralised Strategic Network Plan Guidance

ScottishPower Response

Do you agree that Chapter 2 – developing and submitting the CSNP Methodology - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree

We agree that developing and submitting the CSNP Methodology reflects the policy intent of the CSNP with the steps NESO must follow in developing and submitting the CSNP Methodology defined.

We do however believe there are areas where the guidance could be strengthened to better reflect the policy intent and ensure effective implementation. This includes providing further clarity on future iteration and stakeholder feedback, ensuring NESO demonstrates the steps taken to consider the policy objectives of regional and devolved policies and transparency of the modelling approaches adopted.

Do you agree that Chapter 3 – general requirements applying to all CSNP stages - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree

In general, the guidance reflects the policy intent of the CSNP, however there are areas where it could be clearer and improved to ensure alignment with the policy ambitions of the CSNP. For example, we feel greater emphasis could be given on spatial planning integration. Whilst it is clear the important of integrating the SSEP into the CSNO process, we feel Chapter 3 could more explicitly require NESO to demonstrate how spatial planning outputs are embedded across all CSNP stages. Chapter 3 also makes reference to the need to consider environmental and community impacts, however we feel it lacks detailed expectations on how NESO should balance trade-offs between cost, carbon, and community.

Do you agree that Chapter 4 – Stage 1: model future energy supply and demand - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree

We broadly agree that Chapter 4 reflects the policy intent of the CSNP, particularly in its ambition to move beyond traditional scenario-based forecasting and toward a more strategic, whole-system approach to modelling future energy supply and demand.

Chapter 4 recognises the need to model electricity, gas, and hydrogen systems in an integrated manner, and it sets out expectations for NESO to use transparent, evidence-based methodologies.

However, we believe there are several areas where the guidance could be strengthened to better reflect the policy intent and ensure robust delivery. Whilst the guidance refers to incorporating network constraints, it is not entirely clear how they will be modelled across scenarios. We believe this to be crucial to determining the outputs. This is critical for ensuring realistic and actionable outputs. We welcome the referencing to stakeholder engagement, but this area could be strengthened to ensure stakeholders have transparency and adequate opportunity to challenge assumptions and/or influence scenario design

Do you agree that Chapter 5 – Stage 2: identifying system needs – adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree

Chapter 5 of– Stage 2: identifying system needs – largely reflects the policy intent of the CSNP, particularly in its ambition to provide a robust, whole-system view of future infrastructure requirements. The focus on a whole system approach and scenario-based analysis is positive in terms of policy alignment, however we feel there are some areas that could be improved upon and the guidance strengthened to better support the strategic goals. For example, again we think stakeholder challenge could benefit from greater clarity. Whilst the guidance refers to regional needs, NESO must embed outputs from the SSEP into the system needs assessment. We also feel it is unclear how NESO will manage uncertainty identified as part of the system needs assessment. We would welcome more clarity on this setting out how this will be communicated to stakeholders.

Do you agree that Chapter 6 - Stage 3: identifying options - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree

Yes Chapter 6 - Stage 3: identifying options, does broadly reflect the policy intent of the CSNP, but there are areas where the guidance could be enhanced to better support the strategic goals for delivering a whole-system, transparent, and deliverable approach to network planning. For example, there is limited detail on how NESO should identify and assess non-network options. The SSEP could be more clearly embedded into the option identification process.

Do you agree that Chapter 7 - Stage 4: decision-making framework - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree

Chapter 7 - Stage 4: decision-making framework broadly reflects the policy intent of the CSNP, particularly in its ambition to support transparent, whole-system, and evidence-based investment planning. However, as noted before in this response, there are areas where the framework could be strengthened.

For example, the guidance is not clear on how NESO should consider the weighting against each decision-making criteria, without this, it could lead to inconsistent decision making. We also feel the guidance could be clearer on how government policy and CfD rounds will influence the decisions.

Do you agree that Chapter 8 – develop a CSNP - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree

We agree that Chapter 8– Stage 5: develop the CSNP generally reflects the policy intent of the CSNP, particularly in terms of ensuring a transparent, consultative, and robust process for finalising the plan. That said, there are some areas where the guidance could be improved upon, in particular to support stakeholder expectations. We would also welcome more clarity on how the CSNP outputs will relate to other frameworks such as RIIO, NOA and CfD rounds.

Do you agree that Chapter 9 – Stage 6: handover to a delivery body - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree

Yes, particularly in its aim to ensure a smooth transition from strategic planning to implementation.

Do you agree that Chapter 10 – Other planning roles in CSNP - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree. We're proposing that offshore connections should be planned within the scope of the CSNP. We set out our requirements on the licensee with regards to this additional scope (see chapter 10: Electricity - offshore network planning in the CSNP). What are your views on this proposal?

Yes – we welcome the inclusion of offshore network planning and clarification of NESO's role with respect to coordination of offshore planning alongside onshore. There does however appear to be lack of clarity as to how the CSNP will interact with likes of Offshore Transmission Network Review (OTNR) or Holistic Network Design (HND). We do welcome the reference that they be considered. There does not appear to be a formal route for offshore stakeholders to engage in the process. We believe this is a key area that requires further consideration.