

# Governance

## CSNP Coordination Governance Document

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Publication date: 16 December 2025

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### Overview

This governance document is designed to support the delivery of the Central Strategic Network Plan (CSNP), enabling whole-system network planning and supporting our funding decisions under RIIO-ET3. Strong collaboration between the National Energy System Operator (NESO) and electricity transmission network companies (for the purposes of this document 'ETOs' or 'licensees') is central to achieving these objectives.

This document sets out the roles, responsibilities, and reporting requirements for the NESO, ETOs and Ofgem relating to the timeliness, accuracy and completeness of data exchange for the CSNP.

This Governance Document is designed to complement existing industry codes such as the System Operator–Transmission Owner Code (STC) and associated procedures and is designed to operate alongside those existing codes.

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# 1. Introduction

- 1.1 This chapter sets out the background to the CSNP Coordination Governance Document, which applies exclusively to the electricity transmission (ET) and does not extend to other energy vectors.
- 1.2 The CSNP is a comprehensive whole-system planning framework. Its purpose is to identify and coordinate the most efficient investment and operational decisions across the system, ensuring that future network needs are met in a way that supports decarbonisation targets, delivers consumer value, and maintains security of supply. By providing a central, transparent view of network requirements, the CSNP enables informed regulatory decisions under RIIO-ET3.
- 1.3 Collaboration between the Electricity Transmission Owners (ETOs) and the National Energy System Operator (NESO) is essential for the successful delivery of the CSNP. Effective network planning depends on accurate, timely, and comprehensive information from across the system, enabling NESO to undertake power system analysis, optioneering, and other activities needed to produce a robust CSNP. Coordinated inputs from the ETOs help identify optimal investment pathways, manage interdependencies, and avoid duplication, while streamlined data sharing reduces delays and supports decarbonisation and consumer value objectives. This collaboration also underpins our ability to make informed funding decisions under RIIO-ET3.
- 1.4 This document is issued by the Authority in accordance with Special Condition 9.24 of the ETO licences.

## Context and related publications

- 1.5 The ETO's Special Condition 9.24 and the NESO's Condition C17 (Part G) are complementary obligations designed to ensure effective data exchange for the CSNP. Special Condition 9.24 places a direct requirement on ETOs to provide timely and accurate information to the NESO. Condition C17 requires NESO to monitor and report to Ofgem on the quality and timeliness of these submissions. Together, these obligations create a coordinated framework that promotes accountability, supports whole-system planning, and helps deliver consumer value and decarbonisation objectives.
- 1.6 This Governance Document sets out:
  - Roles and responsibilities for NESO, ETOs and Ofgem;
  - Data submission requirements for the ETOs to the NESO;
  - Reporting requirements for NESO to Ofgem; and
  - Routes for conflict resolution.

- 1.7 This Governance Document also sets out the roles, responsibilities, and principles for data exchange required between the ETO, NESO and Ofgem<sup>1</sup> to ensure the effective delivery of the CSNP. It also sets out reporting requirements for NESO to report to Ofgem on ETOs compliance with the requirements.
- 1.8 The CSNP Coordination Governance Document provides a governance framework to ensure compliance with NESO's Licence Condition C17 and Ofgem's CSNP Guidance Document, while maintaining alignment with existing STC principles for planning coordination and data exchange. It is designed to complement, not replace, existing industry codes and procedures. This document establishes a principles-based framework for information exchange and reporting obligations critical to CSNP development, recognising that the STC and associated STCPs will ultimately set out broader requirements for data exchange across a wide range of strategic planning activities. This approach ensures transparency, consistency, and accountability in strategic network planning.
- 1.9 This governance framework will operate alongside existing codes by:
- Aligning with STC/STCP processes where possible; and
  - Supporting future code development by helping inform any periodic reviews of STC/STCPs and other codes, helping identify gaps or overlaps and enabling rationalisation in future price control periods (e.g. RIIO-ET4).
- 1.10 This document is to be read in conjunction with the following documents:
- CSNP Guidance Document<sup>2</sup>
  - CSNP Methodology
  - RIIO-ET3 Final Determinations<sup>3</sup>
  - Electricity Transmission Special Condition 9.24
  - Electricity System Operator Licence<sup>4</sup>
  - Data Best Practice guidance<sup>5</sup>
- 1.11 Before directing any amendment to the CSNP Coordination Governance Document, Ofgem will publish on its website:
- the text of the amended CSNP Coordination Governance Document;

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<sup>1</sup> In this document we use the terms, 'Ofgem' and 'the Authority' as well as the terms 'we', 'us' and 'our' interchangeably. Ofgem is the Office of the Gas and Electricity Markets. The Authority is the Gas and Electricity Markets Authority and is the governing body of Ofgem, consisting of non-executive and executive members.

<sup>2</sup> [https://www.ofgem.gov.uk/sites/default/files/2025-11/Centralised%20Strategic%20Network%20Plan%20guidance\\_0.pdf](https://www.ofgem.gov.uk/sites/default/files/2025-11/Centralised%20Strategic%20Network%20Plan%20guidance_0.pdf)

<sup>3</sup> <https://www.ofgem.gov.uk/decision/riio-3-final-determinations-electricity-transmission-gas-distribution-and-gas-transmission-sectors>

<sup>4</sup> <https://epr.ofgem.gov.uk/c/9wgWVKeHRymQ3pBbiptyqA/p/0196c209-4e4c-4e2b-92ae-525b634f2f51/wvp/f4c47ea6-0982-4b58-86dd-e4bb3bf49019>

<sup>5</sup> <https://www.ofgem.gov.uk/guidance/data-best-practice-guidance>

- the date on which the Authority intends the amended CSNP Coordination Governance Document to come into effect;
- the reasons for the amendments to the CSNP Coordination Governance Document; and
- the period during which representations may be made on the amendments to the CSNP Coordination Governance Document, which will be up to 28 days.

## 2. Overview

This chapter sets out the roles and responsibilities for ETOs, NESO and Ofgem with respect to the governance of the information exchange between the parties.

### Roles and responsibilities

- 2.1 The ETOs and the NESO must assign a person or persons within the respective organisations as coordinator to manage the sending and receiving of relevant information that is relevant for the development of the CSNP. The way data is shared should be agreed between both sides and should be automated where possible.
- 2.2 If needed, different people within the respective organisations who can be assigned for specific types of data. The agreed contact details should be clearly referenced in against each type of data exchange.

### The National Energy System Operator (NESO)

- 2.3 The NESO is responsible for clearly defining the data that ETOs must provide to support the development of the CSNP. This includes specifying the type, format, and level of detail required, as well as the timing of submissions aligned to key stages of the CSNP lifecycle, such as initial scoping, optioneering, and final plan development. NESO must also set out the processes and channels for data submission to ensure consistency, transparency, and efficiency, enabling accurate analysis and timely decision-making.
- 2.4 The NESO must coordinate with ETOs to gather accurate and timely data on assets, planned works, and reinforcement options, and integrating this information into robust power system analysis and optioneering.
- 2.5 The NESO is responsible for the integrity of that data through the CSNP process, and any output data that it creates.
- 2.6 The NESO must maintain transparency and clearly communicate to ETOs its planning assumptions, and modelling methodologies set out in its CSNP Methodology.
- 2.7 The NESO must monitor ETO compliance with data submission requirements and reports performance to us and provides recommendations to address delays or quality issues.
- 2.8 The NESO should have due regard to Chapter 10: Strategic energy system planning of the NESO Licence Expectation Document<sup>6</sup> – that sets their roles and responsibilities in relation the development of the CSNP.

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<sup>6</sup> [Draft\\_NESO\\_Licence\\_Expectations\\_Document.pdf](#)

## Electricity Transmission Owners (ETO)

2.9 The ETOs are required to provide all data and information specified by the NESO to support the development of the CSNP. This includes submitting accurate, complete, and timely data in the format and through the channels defined by NESO. ETOs must ensure that submissions meet any deadlines set by NESO. In addition, ETOs must promptly notifying NESO of any material changes to previously submitted data to maintain the integrity of the planning process

2.10 The ETOs must provide to the NESO timely, accurate data in line with NESO's requirements that may include but not limited to:

- assets and asset condition;
- planned works;
- reinforcement options for both short- and long-term horizons as defined by the NESO;
- delivery dates and underlying justification;
- costs estimations and underlying justification;
- engineering justifications;
- information gathered via stakeholder engagement; and
- any methodologies and assumptions used to derive any of the items above.

## Ofgem

2.11 Ofgem will provide regulatory oversight and governance for the information exchange between ETOs and NESO.

2.12 Ofgem will monitor NESO's reporting on ETO compliance, ensuring that data submissions are timely, accurate, and complete. We will use this information to inform recommendations to improve the information exchange processes as part of the CSNP process

2.13 Ofgem will manage amendments to the governance document, publishing changes and consultation periods, and ensures alignment with wider regulatory frameworks and industry codes.

2.14 If disagreements arise between NESO and ETOs with respect to NESO's compliance report that cannot be resolved, we will act as an independent mediator.

2.15 Ofgem may seek technical advice from NESO and ETOs, where it identifies areas for improvement or issues relating to data reporting. Such advice may be requested to validate methodologies, assess data integrity, or recommend corrective actions. Any findings or recommendations arising from this technical review will be communicated to all parties and, where appropriate, incorporated into future reporting requirements or governance updates.

### 3. Strategic Planning Data Reporting Principles

#### Reporting principles

- 3.1 ETOs and NESO must consistently apply the following principles. These principles ensure that the CSNP outputs are transparent, accurate, and aligned with whole-system objectives.
- 3.2 ETOs and NESO should adopt common data standards and formats to maintain interoperability, comply with Ofgem's Data Best Practice guidance, and where possible align with relevant reporting principles under the System Operator–Transmission Owner Code (STC).
- 3.3 ETOs and NESO must observe the principles set out below:
- Transparency: Clearly document methodologies, assumptions, and reporting processes.
  - Accuracy and timeliness: Ensure data is complete, validated, and current.
  - Align reporting cycles with CSNP planning milestones: Include version control and change logs for updates.
  - Consistence and interoperability:
    - (i) Use common terminology and standard data formats across NESO and ETOs;
    - (ii) Apply Ofgem's Data Best Practice principles<sup>7</sup> for metadata and interoperability; and
    - (iii) Ensure compatibility with whole-system planning tools (electricity, gas, hydrogen).
  - Security and confidentiality:
    - (i) Comply with cyber security standards and data privacy regulations; and
    - (ii) Apply appropriate anonymisation for sensitive or commercially confidential data.
  - Whole-system alignment: Use common planning assumptions agreed under NESO's CSNP Methodology.
  - Alignment with codes and licences:
    - (i) Where feasible align with relevant STC principles for data exchange (Sections D & F), STCP 12-1 D and other relevant documents;
    - (ii) Follow NESO Licence Conditions (e.g., C17 for CSNP, C12 for methodology); and
    - (iii) Ensure alignment with Ofgem's Digitalisation Strategy and Action Plan Guidance.<sup>8</sup>

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<sup>7</sup> [Data-Best-Practice-Guidance-v3.5.pdf](#)

<sup>8</sup> [Digitalisation-Strategy-and-Action-Plan-Guidance-v3.5.pdf](#)



- Digitalisation and accessibility: Where feasible, provide machine-readable data formats and APIs where feasible.

## **Dispute resolution**

### **Scope**

- 3.4 Dispute resolution under this governance document applies exclusively to disagreements between an ETO and the NESO relating to the NESO's compliance and performance reports submitted to Ofgem.
- 3.5 Where an ETO disagrees with NESO's assessment in its report to Ofgem, parties should first seek to resolve the matter through direct discussions prior to escalation to Ofgem.
- 3.6 Any disputes arising in relation to the development, implementation, or interpretation of the CSNP shall be managed in accordance with the procedures set out under the CSNP Governance Framework.

### **Escalation**

- 3.7 If discussions do not resolve the disagreement, ETOs and NESO may escalate the matter to Ofgem. Escalation should occur promptly and be documented progression.
- 3.8 If there is a dispute between the NESO and an ETO relating to NESO's compliance and performance reports submitted to Ofgem, parties may escalate the dispute by sending a Dispute Notice to Ofgem as a last resort.
- 3.9 Ofgem's decision will explain what actions each party needs to take to implement the decision.
- 3.10 After the Authority's decision, each party must take all necessary steps promptly to comply. This may include issuing, including or withdrawing elements from NESO's compliance and performance reports submitted to Ofgem.

## 4. NESO Reporting Requirements

This chapter sets out the National Energy System Operator obligations in relation to the CSNP.

### Context

- 4.1 The NESO's reporting obligations apply across the entire CSNP planning cycle. They cover the quality and timeliness of data submissions from ETOs, any issues that could impact CSNP delivery, and recommendations for improvement.
- 4.2 The NESO must report regularly to Ofgem on the performance of ETOs in relation data exchanges for CSNP activities. These reports provide Ofgem with visibility of compliance, highlight any risks or delays, and support timely regulatory decisions.

### Establish data reporting requirements for ETOs

- 4.3 The NESO must clearly define the data that ETOs must provide to support the development of the CSNP.
- 4.4 The NESO must set out the processes and channels for data submission to ensure consistency, transparency, and efficiency. This obligation includes specifying the type, format, and level of detail for each dataset, as well as submission timelines aligned to the CSNP lifecycle stages.
- 4.5 The NESO must clearly specify the timing and frequency of all required reports throughout the CSNP lifecycle to ETOs. This includes identifying which reports are scheduled at key milestones and which may be provided on an ad-hoc basis.
- 4.6 The NESO should publish a reporting schedule that aligns with the CSNP stages and ensure that all stakeholders understand when updates are expected.
- 4.7 The NESO must establish standardised processes and secure channels for data submission to ensure consistency, transparency, and efficiency. These measures enable accurate analysis, timely decision-making, and compliance with governance requirements.
- 4.8 The list below sets out examples for illustrative purposes only and does not constitute an exhaustive list of data requirements:

#### Stage 1 – Modelling Future Supply and Demand

- Generation and demand forecasts: Long-term projections for electricity demand and generation, including low-carbon technologies and distributed energy resources.
- Connection pipeline data: Details of planned and contracted generation and demand connections.
- System constraints: Current and forecasted network limitations impacting supply-demand balance.

#### Stage 2 – Identifying System Need

- Network capability data: Thermal ratings, voltage limits, and stability margins for existing assets.
- Asset condition information: Age, health indices, and maintenance schedules.
- Constraint management data: Historical and forecasted constraint costs and operational limitations.
- Interdependency data: Links between transmission assets and other infrastructure (e.g. offshore wind connections).

#### Stage 3 – Identifying options

- Technical specifications: Design parameters for reinforcement or new build options.
- Cost estimates: Capital and operational expenditure for proposed solutions.
- Deliverability assessments: Construction timelines, supply chain status and planning consent status.
- Risk and dependency: Potential delays, supply chain risks, and interactions with other projects.

#### Stage 4 – Decision-making tools

- Cost-benefit inputs: Financial models, whole-system cost impacts.
- Risk analysis: Probability and impact assessments for technical, financial, and delivery risks.
- Environmental and social impact: Carbon savings, land use implications, and community considerations.

### Reporting requirements to the Authority

4.9 The licensee must report annually to Ofgem regarding the ETOs compliance with NESOs data requirements as part of its development of the CSNP.

4.10 NESO may use the template set out in Appendix 2 or adapt it for reporting. Each report should include:

- Compliance performance
- Data quality assessment.
- Issues and risks with mitigation steps.

4.11 NESO should establish a mechanism to report risks identified during the CSNP development process as soon as they arise, rather than waiting for scheduled reporting points. This includes risks that could impact data quality, timeliness, stakeholder engagement, or delivery of key CSNP milestones. NESO should provide clear guidance to ETOs and Ofgem on how such risks may be

documented, communicated to relevant parties. The process should ensure transparency, enable early intervention, and minimise disruption to the CSNP lifecycle.

#### Timing of reports to the Authority

- 4.12 NESO must submit an annual report covering the regulatory year from 1 April to 31 March. The deadline for submission is 30 September following the end of the reporting year, unless Ofgem agrees to an extension in writing.

## 5. ETO Reporting Requirements

This chapter sets out the ETO reporting obligations in relation to CSNP planning.

### Introduction

- 5.1 Timely, accurate, and complete data from ETOs is critical to the successful delivery of the CSNP. The NESO relies on this information to perform robust system analysis, identify network needs, and develop efficient reinforcement options that support whole-system planning. Without high-quality data, the CSNP process risks delays, cost escalation, and suboptimal investment decisions.
- 5.2 Consistent and transparent reporting ensures that planning assumptions are reliable, interdependencies are managed effectively, and we can make informed funding decisions under RIIO-ET3. In short, strong compliance with reporting obligations enables coordinated decision-making, reduces uncertainty.

### Reporting requirements

- 5.3 ETOs must provide timely, accurate, and complete data to NESO throughout the CSNP planning cycle.
- 5.4 All submissions should follow the formats and timelines specified by NESO and align with associated industry codes and procedures, where necessary. Additionally, ETOs are expected to collaborate with NESO to identify issues, share insights, and consider alternative solutions to ensure robust whole-system planning. This may include but is not limited to:
- Data on assets owned and operated by the licensee;
  - Condition information and site information;
  - Details of any planned programme of works and any asset reservation or allocation.
  - Reinforcement options for both long-term planning (covering at least a 25-year horizon) and short-term planning (covering at least a 12-year horizon). that includes:
    - (a) Estimated cost;
    - (b) Estimated delivery date;
    - (c) Justification for both cost and delivery date;
    - (d) Environmental or other relevant information, as required and reasonably available.
- 5.5 The licensee must provide, in a timely manner, any supporting information specified by the NESO. This includes information necessary for:
- Modelling future supply and demand;
  - Identifying system needs;

- Developing network reinforcement options;
- Assessing network reinforcement options.

5.6 Where an ETO engages with third parties and have distinct working arrangements—such as joint ventures, consortia, or other collaborative structures—to develop network options, the ETO remains fully responsible for meeting reporting obligations. This includes ensuring that any data, assumptions, and methodologies arising from such third-party arrangements are captured and submitted to NESO in accordance with the timelines, formats, and standards specified in this governance document. The involvement of third parties does not remove or dilute the ETO’s accountability for reporting. ETOs must clearly identify where third-party inputs have informed submissions and provide supporting evidence

# Appendix 1 – Dispute notice template

## Section subheading

A1.1 NESO and ETOs must use the template set out in this appendix when formally submitting a Dispute Notice to Ofgem.

### Dispute Notice Template

**To:** The Authority

**Other disputed party:** [Insert names of other disputed party]

**From:** [Your organisation name]

**Date:** [DD/MM/YYYY]

### 1. Details of the Dispute

- **Parties involved:** [List all parties]
- [Explain what part of NESO's compliance and performance reports submitted to Ofgem the dispute relates to]
- **Summary of the issue:**  
[Provide a brief description of the dispute, including relevant facts and circumstances.]

### 2. Background

[Explain the context leading to the dispute, including any previous attempts to resolve it informally.]

### 3. Relief or resolution sought

[State what outcome or resolution you are seeking.]

# Appendix 2 NESO annual report to the Authority

## NESO CSNP Compliance and Performance Report

### Overview

Reporting Period: [Insert period, e.g., Q1 2026]

Submission Date: [DD/MM/YYYY]

### 1. Executive Summary (Max 200 words)

Provide an overview of reporting performance, key milestones achieved, and summary of compliance status.

### 2. Compliance Assessment

Summarise compliance for each licensee and include evidence where required.

Requirement	Status	Evidence	Comments
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### 3. Data Assessment

Assess completeness, accuracy, and timeliness of data submissions for each licensee.

Data Category	Completeness	Accuracy	Timeliness	Overall Rating
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### 4. Issues and Risks Identified

Document current issues, risks, and mitigation steps.

Risk	Impact	Likelihood	Mitigation	Owner	Status
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### 5. Escalations and Dispute Status

Summarise any issues escalations raised and dispute resolution status.

### 6. Recommendations for Improvement

Provide recommendations for process improvements, system enhancements, and stakeholder engagement.

### 7. Appendices

Attach detailed compliance evidence, risk register, and dispute notices.