

# Decision

## RESP – Licence Modifications

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This document outlines our decisions regarding the responses to the Regional Energy Strategic Plan (RESP) statutory consultation on licence modifications which ran from 16<sup>th</sup> October 2025 to 28<sup>th</sup> November 2025. We consulted on modifications to the Electricity System Operator (ESO) Licence, the Gas System Planner (GSP) Licence, the Standard Conditions of the Electricity Distribution Licence and Part D of the Standard Special Conditions of the Gas Transporters Licence, to implement the RESP. We also consulted on the RESP guidance, an associated document which accompanies the licence modifications.

## Decision RESP – Licence Modifications

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# Executive summary

## Purpose

This decision implements modifications to licence conditions and associated RESP guidance to implement the RESP. This follows our April 2025 Decision on the RESP Policy Framework,<sup>1</sup> and extensive consultation on the proposed licence modifications.<sup>2</sup>

## Scope

Through our policy framework decision and this licence modification, we have established a new obligation for the Independent System Operator and Planner (“ISOP”, also known as the National Energy System Operator or “NESO”) to develop and deliver the RESP. This includes, but is not limited to, setting deadlines for submissions and publication of the RESP Methodology and RESPs themselves. This new obligation is achieved through modifications to NESO’s Electricity System Operator (ESO) and Gas System Planner (GSP) licences.

We have introduced a requirement for the Distribution Services Providers (DNOs) and holders of a Gas Transporter Licence with Distribution Networks (GDNs) as listed in Appendix 1 to Standard Special Condition D23 of the Gas Transporter Licence to participate and support NESO in the development of the RESP.<sup>3</sup> This new requirement is achieved through modifications to the Standard Licence Conditions of the Electricity Distribution Licence and Part D of the Standard Special Conditions of the Gas Transporter Licence.

Alongside these licence modifications, we have introduced associated RESP Guidance to provide further detail of obligations on and expectations of NESO, DNOs and GDNs in the development of the RESP. The RESP Guidance contains two parts: Part A – NESO Guidance and Part B – DNO & GDN Guidance. The RESP Guidance includes, but is not limited to, details on the requirements for delivering the RESP outputs, RESP governance arrangements, and details of requesting and sharing information.

## Next Steps

Following this decision, the changes to these licences will come into effect on 13<sup>th</sup> of May 2026, following a 56 day standstill.

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<sup>1</sup> Regional Energy Strategic Plan Policy Framework Decision: <https://www.ofgem.gov.uk/decision/regional-energy-strategic-plan-policy-framework-decision>

<sup>2</sup> Regional Energy Strategic Plan Policy consultation on Licence Modifications and Guidance Document: <https://www.ofgem.gov.uk/consultation/regional-energy-strategic-plan-policy-consultation-licence-modifications-and-guidance-document>

<sup>3</sup> We refer to these holders of an Electricity Distribution Licence as Distribution Network Operators (DNOs), and to relevant holders of a Gas Transporter Licence with Distribution as Gas Distribution Network Operators (GDNs) throughout this document.

# 1. Introduction

This section provides background on the RESP Policy Framework, published in April 2025. It also sets out what we consulted on in advance of reaching this decision.

- 1.1 As the UK transitions to net zero, reforming how we plan our energy infrastructure is essential to meeting the 2030 targets and delivering a clean and secure energy system for the long term. To support this, we introduced the RESP in April 2025. The RESP is a new framework designed to enhance accountability and coordination in the strategic planning of the distribution network. This framework builds on our review of local governance and institutional arrangements including our decision in November 2023<sup>4</sup> that NESO will deliver the RESP.
- 1.2 The purpose of the RESP is to develop a strategic view of the future of the energy system at a sub-national level and set the direction of distribution network planning. The scope is limited to the distribution level of the system; however, NESO should consider the wider context of the energy system and particularly boundary interactions with the transmission system.
- 1.3 RESPs will be developed and delivered by NESO in 11 RESP nations and regions across Great Britain (GB). NESO will bring together stakeholders in a region or nation to form a shared vision for how the energy system should evolve, aligning local priorities with GB-wide objectives. By coordinating development across multiple energy vectors, RESP will help enable confident, efficient investment in the journey to net zero.
- 1.4 In our April 2025 policy framework decision, we outlined the approach for implementing the framework. This included the intention to make modifications to NESO's, GDNs' and DNOs' licences, alongside a RESP Guidance Associated Document.
- 1.5 In July 2025 we consulted on the licence modifications and RESP Guidance, and we received 16 responses. Following this we developed the licences and RESP Guidance and published a statutory consultation in October 2025, to which we received 12 responses. This document outlines our decision following these two consultations and summarises the most recent responses to our statutory consultation.

## What we consulted on

- 1.6 In October 2025, we consulted on proposed modifications to NESO's ESO and GSP licences, as well as the Standard Licence Conditions of the Electricity Distribution Licence, and Part D of the Standard Special Conditions of the Gas Transporter Licence.

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<sup>4</sup> [Decision on future of local energy institutions and governance | Ofgem](#)

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1.7 In our consultation, we proposed licence conditions to ensure NESO, DNOs and GDNs deliver and comply with the RESP Policy Framework. The RESP Guidance details how NESO, DNOs and GDNs must fulfil licence obligations. This includes contributing to the development of the RESP Methodology and the creation of RESPs.

1.8 This consultation was a statutory consultation (in respect of the licence modifications) under s11A of the Electricity Act 1989 and s23 of the Gas Act 1986. This consultation was an opportunity for stakeholders to provide feedback on the proposed licence modifications.

1.9 The proposed modifications to the licences and RESP Guidance were included as annexes to this consultation:

- Annex A: Proposed Modifications to the Energy System Operator Licence
- Annex B: Proposed Modifications to the Gas System Planner Licence
- Annex C: Proposed Modifications to the Standard Licence Conditions of the Electricity Distribution Licence
- Annex D: Proposed Modifications to Part D of the Standard Special Conditions of the Gas Transporters Licence
- Annex E: Proposed RESP Guidance Associated Document
- Annex F: Notice to modify standard and special standard conditions

1.10 We proposed changes to the following DNO licences:

| Acronym | Group                                 | Licensees (and acronym)  |
|---------|---------------------------------------|--|
| NPg     | Northern Powergrid                    | Northern Powergrid: Northeast (NPgN)<br>Northern Powergrid: Yorkshire (NPgY)   |
| SPEN    | Scottish Power Energy Networks        | Scottish Power Distribution (SP Distribution)<br>Scottish Power Manweb (SP Manweb)<br>Scottish Power Electricity North West (ENWL) |
| SSEN    | Scottish and Southern Energy Networks | Scottish and Southern Energy Power Distribution:<br>Scottish Hydro Electric Power Distribution (SSEH)                              |

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|      |  |  |
|------|--|--|
|      |  | Scottish and Southern Energy Power Distribution:<br>Southern Electric Power Distribution (SSES)  |
| UKPN | UK Power Networks                      | UK Power Networks: London Power Networks (LPN)<br><br>UK Power Networks: South East Power Networks (SPN)<br><br>UK Power Networks: Eastern Power Networks (EPN)  |
| NGED | National Grid Electricity Distribution | National Grid Electricity Distribution (West Midlands) plc (WMID)<br><br>National Grid Electricity Distribution (East Midlands) plc (EMID)<br><br>National Grid Electricity Distribution (South Wales) plc (SWALES)<br><br>National Grid Electricity Distribution (South West) plc (SWEST) |

1.11 We proposed changes to the following GDN licences:

| Acronym | Group                            | Licensee (and acronym)   |
|---------|----------------------------------|--|
| Cadent  | Cadent Gas Limited               | Cadent Gas Limited   |
| NGN     | Northern Gas Networks Limited    | Northern Gas Networks Limited (NGN)                                |
| SGN     | SGN                              | Scotland Gas Networks plc (SGN)<br>Southern Gas Networks plc (SGN) |
| WWU     | Wales and West Utilities Limited | Wales and West Utilities Limited (WWU)                             |

## Related publications

[Decision on the Regional Energy Strategic Plan Policy Framework](#)

## **Decision RESP – Licence Modifications**

[Regional Energy Strategic Plan Policy consultation on Licence Modifications and Guidance Document | Ofgem](#)

[Regional Energy Strategic Plan: licence modifications and guidance document | Ofgem](#)

### **Decision-making stages**

**Stage 1** Consultation open: 16 October 2025

**Stage 2** Consultation closed: 29 November 2025

**Stage 3** Responses reviewed and published: 13 March 2026

**Stage 4** Consultation outcome (decision or policy statement): 13 March 2026

## 2. Modifications to the Electricity System Operator and Gas System Planner Licences

This chapter sets out our modifications to both the ESO and GSP Licences to formally introduce the role of delivering the RESP to NESO.

For each relevant section of the licences and RESP Guidance Associated Document, we (i) set out the purpose of the changes as we proposed in our October 2025 statutory consultation, (ii) summarise the points raised by stakeholders in response to these proposed changes; (iii) outline our decision and provide our rationale, as informed by stakeholder responses.

### Introduction

1.12 In our November 2023 decision,<sup>5</sup> we confirmed that NESO will deliver the RESPs. To implement this decision, we need to modify NESO’s licence, specifically to introduce new obligations and new definitions relevant to the introduction of the RESPs. The licence modifications are the same across NESO’s ESO and GSP licences.

1.13 To reach this decision on the required licence modifications, we have formally consulted twice, alongside working groups and extensive bilateral engagement.

1.14 The following section outlines the changes made to both the ESO and GSP Licences (Annex A and B). This includes a full list of the new definitions as set out at paragraph 2.14 below. We also summarise stakeholder feedback received and explain why we have taken the decision we have.

### Explainer

1.15 ESO Licence Condition C19 (New): Regional Energy Strategic Plan and GSP Licence Condition C13 (New): Regional Energy Strategic Plan are new licence conditions within Section C of the licences, ‘strategic and operational functions’. The full text of the proposed licence conditions is in Annexes A and B of this decision.

1.16 The reason for these licence conditions is to give effect to our April 2025 Policy Framework Decision for NESO to deliver a RESP for each of the RESP nations and regions.

1.17 The effect of the condition is to:

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<sup>5</sup> [Decision on future of local energy institutions and governance | Ofgem](#)

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- oblige NESO to create a RESP Methodology, develop RESPs for each of the RESP nations and regions and to carry out assurance activities to support alignment to RESPs;
- oblige NESO to establish the necessary governance to deliver the RESP including a GB Steering Committee and Strategic Board for each RESP nation or region;
- specify the key components that must be developed within each RESP, as well as key activities NESO must undertake to support RESP delivery;
- establish the process for approval and publication of the RESP Methodology that NESO must follow; and
- explain the nature of the RESP Guidance document and the process the Authority will follow when directing changes to that guidance.

## Consultation Q1 regarding modifications to both the ESO and GSP Licences

Q1. Do you agree that the changes made to the new licence text since our policy consultation, as set out in Annexes A and B, adequately reflect stakeholder feedback and the policy intent of the RESP? Please provide the reasons and any alternative suggestions if you disagree.

### Summary of stakeholder responses

There was consensus on the clarity and appropriateness of the revised terminology, with many stakeholders expressing agreement with, and support for, the recent changes made to the definitions, particularly those relating to RESP Information (previously called ‘RESP Intelligence’). Respondents did, however, suggest several specific drafting and wording improvements, including on the definition of Specification of Strategic Investment Need. While some stakeholders welcomed the requirement on NESO to use ‘best endeavours’ to operate in an efficient manner when requesting the provision of RESP Information, others raised concerns regarding the continued use of the term ‘best endeavours’ throughout the updated licences, including at C19.6/C13.6.

While there was general agreement on the updated definitions, one respondent expressed concern that the draft of ‘RESP Information’ implies that Transmission Network Operators (TOs) are outside the scope of RESP engagement.

The topic of timelines also featured prominently in stakeholder feedback. Some respondents advocated for timelines to serve as illustrative guides rather than strict deadlines. One stakeholder requested that timelines be reconsidered to better reflect achievable outcomes.

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Multiple stakeholders found the wording used in C19.9/C13.9 around “a targeted review” that NESO must carry out following the creation of the RESPs to be unclear, as it was not clear what this would entail or when this review would be triggered.

One stakeholder raised concerns that referring to Distribution Network Operators as ‘holders of an Electricity Distribution Licence’ would include independent distribution network operators (IDNOs) and therefore suggested that the term Distribution Services Provider is used in its place. Similarly, the term ‘holders of a Gas Transporter Licence with Distribution Network’ (as currently used in the licences) could be considered to include independent gas transporters (IGTs).

Several stakeholders raised concerns around a lack of clarity on the approval process for the RESP Methodology and the RESPs themselves, including (i) the role of Ofgem (for the Methodology and the RESPs), (ii) the role of the Secretary of State (for the Methodology only), (iii) the context in which Ofgem may issue a direction, (iv) who would be responsible for approval of the RESP in the first instance and (v) in the case Ofgem did need to take a role in RESP approval, what the scope of this role would be.

### Ofgem response

- 1.18 We have adopted suggested specific drafting and wording improvements to respond to stakeholder comments, including simplifying the definition of Specification of Strategic Investment Need and renaming “National Steering Committee” to “GB Steering Committee” to align with the NESO Methodology Consultation and to reflect the updated terminology of RESP regions and nations. While the scope of the updated RESP Information definition has not changed, we note the potential for this to be amended through future consultation, for example to specify information that NESO may require to inform how they support price controls to validate network companies have appropriately used RESP outputs when developing their plans – see paragraph 2.30 on network planning assurance.
- 1.19 We continue to consider ‘best endeavours’ to remain the clearest and most appropriate term, including regarding C19.6/C13.6 – though we have slightly updated the wording to make the obligation here clearer. Our use of the term ‘best endeavours’ is because we think it is vital to ensure RESP related information requests by NESO are executed in a manner which is efficient and reasonable. This should ensure RESP Information is gathered successfully, minimising burden and building trust between stakeholders. Further detail on why we have continued to use the term ‘best endeavours’ throughout the licences and RESP Guidance is set out at Paragraphs 3.9 – 3.12.
- 1.20 We acknowledge the feedback regarding the potential omission of Transmission Operators (TOs) from the licence and associated definitions. However, we do not consider it appropriate to specify TOs in the licence, as the licence is not intended to list every stakeholder involved in the RESP process, and we do not wish to be overly

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prescriptive about which parties NESO must engage. Licence conditions C19.7(e) and C13.7(e) already require NESO to undertake public consultation with relevant stakeholders in accordance with its RESP Methodology, which provides the appropriate mechanism for identifying the parties that should be involved. However, to respond to this feedback, we have strengthened the RESP Guidance to make explicit the requirement for NESO to maintain coherence of planning across the transmission–distribution boundary and to ensure alignment with wider strategic system plans, including the Centralised Strategic Network Plan (CSNP). The updated paragraph 2.10 now clarifies that the Methodology must explain how NESO will undertake this engagement, and we expect Transmission Operators to be included among the relevant stakeholders through that process.

- 1.21 The topic of timescales was raised in both consultations, and we acknowledge the feedback. We think it is important to have clear, specific deadlines set out in the licence to protect from delays to the delivery of the RESP. We accept some of the timescales were outside of NESO’s control and so have changed the deadline for publishing the RESP Methodology to a defined time after approval. We have not done the same for RESP publication, as we expect NESO to manage the approval process such that RESPs are not delayed beyond the three yearly publication date.
- 1.22 In relation to the requirement for a ‘targeted review’, we have removed clause C19.9/C13.9 from the ESO and GSP licence to clarify the intended point and avoid duplication elsewhere. This assurance activity is accounted for in the licence in C19.2(c) and C13.2(c) and we have clarified the intent and expectations for this assurance in Section 5 of the RESP Guidance.
- 1.23 We have updated the definitions in the licenses to refer to Distribution Services Providers, rather than holders of an Electricity Distribution Licence, to reflect that licence changes do not apply IDNOs. We have also amended the wording used in the licences to refer to holders of a Gas Transporter Licence to specify that this refers to holders of a Gas Transporter Licence with Distribution Network as listed in Appendix 1 to Standard Special Condition D23 of the Gas Transporter Licence.
- 1.24 Reflecting stakeholder feedback, we have updated wording on the approval process for the RESP Methodology, under Part C, to add in wording around the Secretary of State’s (SofS) approval. This responds to stakeholder feedback requesting clarity on the SofS’ and Ofgem’s respective review and approval processes for the RESP. Further information on the respective roles and expectations of Ofgem and the Secretary of State in signing off the methodology is set out in Section 6 of the RESP Guidance.
- 1.25 Several stakeholders requested greater clarity in the licence on the respective approval roles of the Strategic Boards and Ofgem, including how instances of a Strategic Board not being able to agree to approve a RESP should be handled and why Ofgem may intervene in specific circumstances. In response to this feedback, and

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consistent with the approach set out in the RESP Policy Framework and previous consultation drafting on this section, we have amended wording at paragraphs C19.24 and C13.24 to clarify that NESO before publishing any RESP must ensure the relevant Strategic Board has approved it, using reasonable endeavours to do so. Where no approval can be obtained from the Strategic Board, NESO will submit the proposed RESP to Ofgem. In addition, we have amended paragraphs C19.25 and C13.25 of the licences to define Ofgem’s role if Ofgem requires such a submission from NESO, to make clear the different options available to Ofgem in such a scenario. Alongside updated wording at paragraphs 7.6 – 7.7 of the RESP Guidance, this clarifies that Ofgem’s powers in this area are intended to supplement – rather than circumvent – the Strategic Board’s approval process, where possible.

1.26 We have retained paragraphs C19.26-C19.27 and C13.26-C13.27 of the licences from the statutory consultation while making minor revisions which respond directly to stakeholder feedback, e.g., concerns that in C19.27/C13.27 (previously C19.26/C13.26) the distinction between subparagraphs (a) and (b) was unclear. This clarifies Ofgem’s ability to intervene either where a RESP has or has not yet been approved. We consider that these changes maintain the original policy intent, provide the clarity requested by stakeholders, and remain within the scope of what consultees could reasonably anticipate based on the consultation materials and the RESP Guidance.

1.27 To note, we have also removed C19.15/C13.15 from the respective licences, as this is already stipulated by paragraph A2.24 of the licence.

### 1.28 Full list of definitions

**Consistent Planning Assumptions** means a single set of assumptions developed by the licensee which drive coherent derivation of network requirements resulting from the RESP Pathways.

**Distribution Services Provider** means any Electricity Distributor in whose Electricity Distribution Licence the requirements of Section B of the standard conditions of that licence have effect (whether in whole or in part).

**RESP Information:** means such information (other than information subject to legal privilege) to be provided by Distribution Services Providers and relevant holders of a Gas Transporter Licence with Distribution Networks<sup>6</sup> to the licensee which:

(a) relates to the Distribution Services Providers and relevant holders of a Gas Transporter Licence with Distribution Networks;

(b) is in the possession or control of the Distribution Services Providers and relevant holders of a Gas Transporter Licence with Distribution Networks; and

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<sup>6</sup> as listed in Appendix 1 to Standard Special Condition D23 of the Gas Transporter Licence

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(c) the licensee considers necessary to develop the RESP Methodology or the RESPs.

**GB Steering Committee** means a governance body that involves, at a minimum, the Authority, the licensee, and the Secretary of State. Together they provide strategic oversight, expertise, advice, and national-level coordination of strategic energy planning during development of the RESP Methodology and the RESPs.

**RESP Pathway** means a component of each RESP which provides a spatially modelled projection of energy demand and supply over the RESP nations and regions developed by the licensee in line with the RESP Guidance.

**Nations and Regions Context** means a component of each RESP which provides a long-term view of regional conditions and priorities in the relevant RESP nation or region developed by the licensee in line with the RESP Guidance.

**Regional Energy Strategic Plan (RESP)** means a whole-system energy plan developed for RESP nations and regions by the licensee comprised of a Nations and Regions Context, a single 10-year RESP Pathway and multiple longer-term RESP Pathways, a Spatial Context, a Specification of Strategic Investment Need, and Consistent Planning Assumptions. The plural acronym RESPs is used to refer to multiple Regional Energy Strategic Plans.

**RESP Guidance** means the document of that name issued and amended by the Authority from time to time pursuant to condition C19.9/C13.9.

**RESP Methodology** means the methodology, approved by the Authority and the Secretary of State, in accordance with condition C19.14/C13.14, describing how the licensee will develop RESPs.

**RESP nations and regions** means a geographic area, as defined in the RESP Guidance, for which a RESP is developed.

**Spatial Context** means a component of each RESP which provides a geospatial view of RESP Pathways against network data indicating network capacity requirements over the RESP nations and regions developed by the licensee in line with the RESP Guidance.

**Specification of Strategic Investment Need** means a component of each RESP developed by the licensee in line with the RESP Guidance which identifies areas of investment need within the RESP nations and regions which are of high economic and/or system value and necessary to the delivery of regional priorities as set out in the Nations and Regions Context.

**Strategic Board** means a governance body for the oversight of the delivery and approval of each RESP that involves Distribution Services Providers and relevant holders of a Gas Transporter Licence with Distribution Networks, devolved and local governments, and regional cross-sector bodies to provide oversight and steer to the RESP development process and strategic outputs.

## Associated Document – RESP Guidance

### Introduction

- 1.29 This section outlines the changes made to the Associated Document Part A – NESO Guidance following consultation. We also summarise stakeholder feedback received and explain why we have taken the decisions we have.
- 1.30 In order to reach this decision on the RESP Guidance, we have formally consulted twice, in addition to holding working groups and extensive bilateral engagement.

### Explainer

- 1.31 The full proposed RESP Guidance is published in Annex E of this consultation.
- 1.32 The RESP Guidance document is issued by the Authority pursuant to Condition C19 of the Electricity System Operator (ESO) Licence, Condition C13 of the Gas System Planner (GSP) licence, Condition 54 of the Standard Licence Conditions of the Electricity Distribution Licence, and Condition D23 of Part D of the Standard Special Licence Conditions of the Gas Transporter Licence.<sup>7</sup>
- 1.33 The RESP Guidance contains two parts: Part A – NESO Guidance and Part B – DNO & GDN Guidance.
- 1.34 Part A of the RESP Guidance (applicable only to NESO) sets out:
- the general requirements NESO must carry out for the RESP Methodology, including setting out roles and responsibilities, stakeholder engagement and support for local authorities, technical coordination, and data expectations
  - the methodology for the content of a RESP, including Nations and Regions Context, RESP Pathways, Spatial Context, Specification of Strategic Investment Need and, Consistent Planning Assumptions
  - the methodology for RESP governance detailing the establishment of both the GB Steering Committee and the Strategic Boards, as well as the engagement process and working groups
  - the methodology for carrying out assurance activities that NESO must undertake following creation of the RESPs
  - the development and approval process of the RESP Methodology

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<sup>7</sup> Ofgem - The RESP Draft Guidance. <https://www.ofgem.gov.uk/sites/default/files/2025-07/Annex-E-Proposed-RESP-Guidance-document.pdf>

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- the approval process of the RESPs
- the publication process of the RESPs.

1.35 Part B of the ESO and GSP licence conditions introduces the RESP Guidance as an Associated Document to the licences. For the avoidance of doubt, Part B of the RESP Guidance is not applicable to NESO. This is discussed at more length after paragraph 3.21 below.

## Consultation Q2 regarding the RESP Guidance Part A

Q2. Do you agree that the changes made to Part A of the RESP Guidance since our policy consultation, as set out in Annex E, adequately reflects stakeholder feedback and defines the expectations for NESO in their development of the RESP? Please provide the reasons and any alternative suggestions if you disagree.

### Summary of stakeholder responses

While half of stakeholders agreed with the question, half did not. We received several suggestions for changes, summarised below:

One stakeholder noted disappointment about the addition of wording emphasising that the RESP will not be taken to fetter or otherwise limit Ofgem’s discretion in the exercise of its functions, as they felt that it risked devaluing the process, if Ofgem ultimately chose not to use the RESP in its regulatory framework or decisions.

Stakeholders made a number of minor drafting suggestions across Section 2 of the guidance. We detail each of these below in our response.

Several respondents requested that the guidance sets out more clearly the requirements for information sharing between NESO and the GDNs/DNOs, including requiring NESO to share data gathered about distribution network needs. Stakeholders suggested we need to be clearer that the licensee must ensure that data and information requests are reasonable and clearly specified.

Specific amendments were also requested to Section 3 of the guidance, regarding the RESP Pathways, Strategic Investment Need and Consistent Planning Assumptions. For instance, one stakeholder requested that paragraph 3.10 was amended to focus on medium pressure rather than low-pressure tier for gas systems as the appropriate level for Pathway alignment. Another stakeholder raised concerns about the use of ‘Strategic Investment Need’ as well as ‘Strategic Energy Need’, specifically requesting an adjustment to the definition of Specification of Strategic Investment Need to ensure that NESO’s output provides a specification of energy need and does not specify how the DNOs invest in their own distribution systems.

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Several stakeholders requested we clarify the specific roles and responsibilities assigned to participants in the preparation of the RESP Methodology and the RESPs themselves, as set out at Section 4 of the guidance.

One stakeholder requested further clarity in the RESP Guidance regarding expectations around NESO's Network Planning Assurance activities (as set out in Section 5). There was a specific concern raised that forecasts arising from RESP development could be seen to take precedence over gas networks' own demand forecasting and subsequent investment planning. They therefore requested this be amended, with the expectation that RESPs take network planning into account, rather than RESPs defining network planning.

Stakeholders wanted further clarity on the RESP methodology approval process, including how it would be managed. They emphasised the importance of having detailed guidance to ensure that all parties understand their obligations and contributions. They also questioned the process for resolving conflict and requested this was clearer in the guidance.

One stakeholder noted disappointment about the addition of wording emphasising that the RESP will not be taken to fetter or otherwise limit Ofgem's discretion in the exercise of its functions, as they felt that it derisked devaluing the process, if Ofgem ultimately chose not to use the RESP in its regulatory framework or decisions.

### Ofgem response

- 1.36 We have retained wording noting Ofgem's continued discretion in the exercise of its functions, including decisions relating to price control, business plan approvals, or any other regulatory determinations (at paragraph 1.12). While Ofgem will seek to ensure the RESPs are developed in such a manner as to be able to inform its regulatory decisions, it is important to emphasise that we retain overall decision-making responsibility regarding how RESP inputs into price control funding decisions and other regulatory decision-making.
- 1.37 We have updated paragraph 2.10 to give examples of which stakeholders we expect NESO to include in the RESP methodology as those to engage in RESP development. We updated paragraph 2.13 to acknowledge existing engagement and relationships, and we updated paragraph 2.14 to clarify the discretionary nature of support to actors other than local authorities. In paragraph 2.17 we have clarified our expectations for what NESO will have to consider in technical coordination to maintain coherence of planning. Alongside some minor grammatical edits, we updated paragraph 2.31 and 2.33 to clarify the need for NESO to outline where data for the in-development register is sourced and how it intends to share information with DNOs and GDNs.
- 1.38 We acknowledge the request for further information from stakeholders on information sharing between NESO and the GDNs/DNOs, including requiring NESO to

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be obliged to share with the DNOs the data it has gathered as part of calls for evidence in relation to distribution network needs. We consider that the RESP Guidance clearly sets out our expectations that NESO use its best endeavours to share as much information as possible with DNOs and GDNs (and other relevant stakeholders), including at paragraphs 2.22 – 2.25 and 3.24. We think that any additions like specifying standardised data sharing agreements as well as real time or near real time access to critical data would be overly prescriptive and could undermine the benefit in taking a broad, best endeavours approach to data sharing. We believe it is appropriate for further detail on these points to be set out in the RESP Methodology, to allow NESO to weigh up the various factors and make a proportionate proposal. There is also a need to balance data sharing with confidentiality regarding commercially sensitive information. In line with existing obligations under Condition B7 of the ESO licence and B6 of the GSP licence, and provisions of the UK GDPR, NESO is responsible for protecting confidential data and detailing how it will be managed. The licensee must identify any confidential data and information it holds and ensure appropriate protections are in place.

- 1.39 We have updated paragraphs within section 3 regarding the RESP Pathways and Consistent Planning Assumptions in line with stakeholder feedback. For instance, we have updated paragraph 3.10 to reflect that electricity and gas distribution network plans will be expected to align to the RESP Pathways at primary substation and medium-pressure (75mbar to below 2bar) network level, rather than low-pressure level (as previously drafted); and to set out that these expectations have been clearly updated. Moreover, we have removed duplicative language in 3.12-3.14, 3.16 and amending paragraph 3.34, which now requires NESO to use worked examples, where possible, to demonstrate how Consistent Planning Assumptions will be applied in the RESPs.
- 1.40 We continue to believe that the RESP Guidance should utilise both the terms ‘Strategic Investment Need’ and ‘Strategic Energy Need’ and have taken care to ensure both are defined clearly, including through further updates to paragraphs 3.25 – 3.26 of the guidance. We have also sought to align this with further clarifications to our expectations around Consistent Planning Assumptions, through updates to paragraph 3.34.
- 1.41 In line with stakeholder feedback, we have updated Section 4 of the guidance to clarify our expectations for the RESP governance structure and respective roles and responsibilities, including in the production of the RESP Methodology and the associated terms of reference (ToR). We have also added a dedicated section on conflict resolution at paragraphs 4.15 – 4.18 of the guidance, reflecting stakeholder feedback.

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- 1.42 In response to stakeholder feedback to the statutory consultation regarding Network Planning Assurance (NPA), we have updated Section 5 of the RESP Guidance to clarify expectations for RESP assurance activities. The NPA remains a targeted review as per our intent set out in the RESP Policy Framework. However, our updated wording seeks to more clearly demarcate the roles of both NESO and Ofgem in relation to NPA, while ensuring that the specifics of NPA will be informed by Ofgem for each RESP. Therefore, we have set out our expectations around what NESO stipulates in the RESP Methodology, i.e. the framework and principles for assuring network plan alignment to the direction of the RESP, when required by Ofgem; and what we expect to review and approve at a subsequent date. i.e., a RESP network planning assurance specification which NESO will develop, once Ofgem has defined the network planning assurance output for a given RESP.
- 1.43 We acknowledge stakeholder concerns about the interaction between RESP pathways and gas network planning, and we confirm that in line with the Framework Decision, gas network alignment will follow RESP development to ensure planning responds to, rather than anticipates, projected changes in demand, meaning RESP outputs inform but do not define GDNs' own forecasting and investment decisions. It is for price control policy to further detail how RESP inputs into price control funding decisions.
- 1.44 As per stakeholder feedback outlined above, we have updated paragraph 5.3 of the RESP Guidance regarding our expectations of how NESO should set out – in the RESP Methodology – how it will validate that network companies have appropriately used RESP outputs when developing their network investment plans. We expect NESO to review the assurance provided by network companies explaining how they have used the RESP outputs to forecast network headroom (i.e., rather than a full independent assessment by NESO). The steps beyond this (i.e., determining any appropriate network interventions) will remain with Ofgem and depend on a range of interdependent factors, including asset health considerations, compliance and resilience matters.
- 1.45 In accordance with the updates to the ESO and GSP licences on RESP methodology and RESP approval (Parts C & D), we have updated Section 6 of the guidance to provide greater detail and clarification on the development and approval of the RESP Methodology. This includes clarifying Ofgem and the Secretary of State's respective approaches to and expectations around approval of the RESP (at paragraphs 6.5 – 6.10), in alignment with Conditions C19.2(a)/C13.2(a) of the licences. We have also updated paragraph 6.13 to note the Secretary of State and Ofgem's respective roles in approving any critical updates to the RESP Methodology outside of the planning cycle. Lastly, we have made brief changes to paragraphs 2.3, 2.17, 3.26 and 3.33 to further clarify expectations regarding coherence and alignment with UK Government energy policy and engagement with the Department for Energy Security and Net Zero (DESNZ).

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1.46 Lastly, we have updated Section 7 of the guidance to provide greater detail and clarity on the development and approval of the RESPs, including clarifying the circumstances in which Ofgem would intervene in the development and/or approval of the RESPs, including in the case of non-alignment with the RESP Methodology, or where consensus cannot be reached by a Strategic Board. We have also added wording at paragraphs 7.3 and 7.4 to clarify that NESO remains accountable for decisions within the plan development and for the final decision on the RESP following Strategic Board approval. We have set out the corresponding changes made to the ESO and GSP licences at paragraphs 2.14-15 of this decision document.

## 2. Modifications to the Electricity Distribution and Gas Transporter Licences modifications

This section sets out our proposed modifications to both the Standard Licence Conditions of the Electricity Distribution Licence and Part D of the Standard Special Conditions of the Gas Transporters Licence to oblige DNO and GDN participation in the development of the RESPs. For each relevant section of the licences and RESP Guidance Associated Document, we (i) set out the purpose of the changes as we proposed in our October 2025 statutory consultation, (ii) summarise the points raised by stakeholders in response to these proposed changes; (iii) outline our decision and provide our rationale, as informed by stakeholder responses.

### Introduction

- 2.1 In our RESP Policy Framework, we set out that the key to its success was ensuring the DNOs and GDNs are highly engaged throughout the process. Given that we found no existing licence conditions that would adequately ensure their participation, we set the intention to modify DNO and GDN licences obligating them to support NESO's development of the RESP.
- 2.2 This decision confirms this new licence condition for DNOs and GDNs and outlines the obligation to work transparently and collaboratively with NESO to support the development of both the RESP methodology and the RESPs. Our intent is to emphasise that RESP is a priority and ensure ongoing involvement and support.
- 2.3 To reach this decision on the required licence modifications, we have formally consulted twice, alongside working groups and extensive bilateral engagement.
- 2.4 The following section outlines the changes made to both the DNO and GDN licences (Annex C and D). This includes a full list of the new definitions applicable to both licences as set out below. We also summarise stakeholder feedback received and explain why we have taken the decision we have.

## Decision RESP – Licence Modifications

### Explainer

- 2.5 Condition 54 of the Standard Licence conditions of the Electricity Distribution licence and Standard Special Condition D23 in Part D of the Standard Special Conditions of the Gas Transporters Licence are new licence conditions for DNOs and GDNs respectively. The full text of the proposed licence conditions is in Annexes C and D of this decision.
- 2.6 The reason for these licence conditions is to give effect to our April 2025 Policy Framework Decision for DNOs and GDNs to participate in the development of the RESPs.
- 2.7 The effect of these conditions is to:
- oblige DNOs and GDNs to use their best endeavours to participate in the development of the RESP Methodology and the RESPs;
  - oblige DNOs and GDNs to provide appropriate representation on the Strategic Boards in the relevant RESP nations and regions;
  - make provisions for DNOs and GDNs to request to change their level of participation in a Strategic Board where there is justification to warrant a change;
  - oblige the DNOs and GDNs to share RESP Information with NESO within a suitable timeframe and of appropriate quality and format; and
  - explain the nature of the RESP Guidance document and the process the Authority will follow when directing changes to that document.

## Consultation Q3 regarding modifications to the DNO and GDN Licences

Q3. Do you agree that the changes made to the new licence text since our policy consultation, as set out in Annexes C and D, adequately reflects stakeholder feedback and the policy intent of the RESP? Please provide the reasons and any alternative suggestions if you disagree.

### Summary of stakeholder responses

Many stakeholders welcomed changes made to the Licence text in annexes C and D since the policy consultation, and agreed that it adequately reflects the policy intent of the RESP.

Stakeholders welcomed further clarification around the use of the term ‘best case endeavours’ not placing an undue obligation on DNOs to a level of cost and effort that would be detrimental to consumers. DNO and GDN respondents consistently highlighted legal, practical and financial concerns with the expected burden and level of compliance

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denoted by the continued use of the term ‘best’ as opposed to ‘reasonable’ endeavours. Respondents felt that this terminology could result in the RESP process becoming unduly resource intensive and requested that the use of this term be better explained. Several respondents requested that dedicated funding be provided by Ofgem to support GDNs and DNOs in meeting any ‘best endeavours’ obligations imposed by the licence.

Some stakeholders requested further detail regarding the Strategic Boards, with specific emphasis on the need for clarity on sufficient engagement and appropriate representation.

Concerns were again raised by one respondent about the potential exclusion of Transmission Operators as the updated licence obligations apply to DNOs, rather than TOs, and around the exclusion of TOs from RESP Strategic Boards.

One stakeholder requested changes to ensure that the definition for ‘Regional Energy Strategic Plan’ was aligned across the four licences in Annexes A, B, C and D.

### Ofgem response

- 2.8 Following further feedback, we have again considered whether ‘best’ or ‘reasonable’ endeavours is the most appropriate term for use in the licenses and associated guidance. Whilst stakeholders highlighted licence conditions in which the obligation required ‘reasonable endeavours’, there are also several similar licence conditions that use ‘best endeavours’. Following a review of how these terms are currently used in the licence, we consider that the use of ‘best endeavours’ aligns with its use for other such conditions about coordination or following guidance. For instance, in January Ofgem published its decision on the expansion of the Data Best Practice (DBP) as a Code Obligation. The corresponding update to paragraph 7hA, Standard Condition 9 of the Gas Transporter licence requires that the Uniform Network Code Panel must “use its best endeavours to act in accordance with Data Best Practice Guidance.” As with RESP, this is an obligation to input, collaborate, and act in accordance with a structured framework for creating data-related outputs (e.g., decisions, data processes, digital strategies).
- 2.9 Our view remains that ‘best endeavours’ is the appropriate level of obligation in this case, to affirm that DNOs and GDNs must be sufficiently engaged in the RESP development process, and to ensure this is enforceable. The RESP represents a major shift toward whole-system regional planning, requiring coordinated, iterative work across electricity, gas, hydrogen, flexibility, local authorities and NESO. Since network companies are central to system data, forecasts and constraints, NESO cannot produce a credible RESP without their active participation. A ‘reasonable endeavours’ standard risks minimal or delayed engagement and incomplete inputs. By contrast, ‘best endeavours’ signals that robust engagement is essential, supporting timely collaboration, problem-solving and transparent assumptions. This mirrors the similar level of obligation imposed upon NESO to, on best

## Decision RESP – Licence Modifications

endeavours basis, ensure requests for the provision of RESP Information are “efficient and coordinated” and to ensure requirements regarding the timescale, format, and quality of information are reasonable.

- 2.10 A ‘best endeavours’ obligation sets a stronger behavioural signal than ‘reasonable endeavours’ without mandating absolute outcomes that may be outside a network company’s control. Best endeavours is not an absolute requirement and does not entail actions be taken irrespective of cost, proportionality or commercial interest. The licences make clear that this obligation must be balanced with proportionality and existing information availability.
- 2.11 We note requests from some stakeholders for a dedicated, NESO-reflective pass-through to match a ‘best endeavours’ obligation for RESP engagement. However, we do not consider such a mechanism necessary or appropriate. Our expectation is that any costs associated with DNO and GDN participation should be met from existing price control allowances, as RESP should generate efficiencies elsewhere in the network planning process. RESP will provide networks with consistent planning inputs that demonstrate alignment with both GB-wide and local plans, helping to avoid inefficient or premature capital expenditure and reducing the risk of stranded assets. As reflected in Ofgem’s Final RESP Impact Assessment<sup>8</sup>, the quantified benefits of introducing RESP are potentially far greater than the costs, with savings relating to optimisation of future network investment enabled by improved long-term visibility and whole-system coordination.
- 2.12 We acknowledge the request for more clarity in the licences regarding the definitions of “sufficient engagement” and “appropriate representation” on the Strategic Boards, as per Conditions 54.2(b) of the Standard Licence Conditions of the Electricity Distribution Licence and D23.2(b) of the Standard Special Licence Conditions of the Gas Transporter Licence. However, we consider that these definitions are set out clearly at Part B of the RESP Guidance, in paragraphs 9.6 – 9.8, with exemptions set out at paragraphs 9.9 – 9.12. Terms of Reference for the Strategic Boards (see paragraph **Error! Reference source not found.**) will be set out in the RESP Methodology.
- 2.13 As per paragraphs 2.9 – 2.10, we acknowledge feedback on the potential omission of TOs from the licences and the governance of the RESP. However, as the RESP is focused on distribution-level system needs, we do not consider it appropriate to extend RESP-specific obligations to TOs through licence modifications. TOs are already explicitly referenced in the RESP Guidance as stakeholders NESO is expected to engage alongside all other RESP participants, and they are already required to participate in and support NESO’s CSNP process. This includes

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<sup>8</sup> [Final-RESP-Impact-Assessment.pdf](#)

## Decision RESP – Licence Modifications

responding to consultation, providing the necessary data and system information for whole-system modelling, and aligning their network planning with the CSNP. Given these existing obligations and the RESP's scope, imposing additional licence-based requirements for TO engagement would be unnecessarily duplicative and burdensome. Instead, alignment between the CSNP and the RESP will be secured through obligations on NESO under the RESP Guidance and through the ESO and GSP licences. Further detail on this is set out at point 1.22 above.

- 2.14 In response to stakeholder feedback, we have changed the definition of 'Regional Energy Strategic Plan' in Annexes C and D to align the definition across all licence modifications. In addition, we have included the defined terms for each of the RESP components as they are mentioned in the RESP defined term. We have also added the term 'Distribution Services Provider' to Annex D (but not to Annex C, as this is already a defined term in the Electricity Distribution Licence).

### Full list of definitions

- 2.15 **Consistent Planning Assumptions** means a single set of assumptions developed by the ISOP which drive coherent derivation of network requirements resulting from the RESP Pathways.
- 2.16 **Distribution Services Provider** means any Electricity Distributor in whose Electricity Distribution Licence the requirements of Section B of the standard conditions of that licence have effect (whether in whole or in part).
- 2.17 **RESP Information** means such information (other than information subject to legal privilege) to be provided by the licensee to the ISOP which:
- (a) Relates to the licensee's Distribution System;
  - (b) Is in the possession or control of the licensee; and
  - (c) the ISOP considers necessary to develop the RESP Methodology or the RESPs.
- 2.18 **GB Steering Committee** means a governance body that involves, at a minimum, the Authority, the licensee, and the Secretary of State. Together they provide strategic oversight, expertise, advice, and national-level coordination of strategic energy planning during development of the RESP Methodology and the RESPs.
- 2.19 **RESP Pathway** means a component of each RESP which provides a spatially modelled projection of energy demand and supply over the RESP nations and regions developed by the ISOP in line with the RESP Guidance.
- 2.20 **Nations and Regions Context** means a component of each RESP which provides a long-term view of regional conditions and priorities in the relevant RESP nation or region developed by the ISOP in line with the RESP Guidance.

## Decision RESP – Licence Modifications

- 2.21 **Regional Energy Strategic Plan (RESP)** means a whole-system energy plan developed for RESP nations and regions by the ISOP comprised of a Nations and Regions Context, a single 10-year RESP Pathway and multiple longer-term RESP Pathways, a Spatial Context, a Specification of Strategic Investment Need, and Consistent Planning Assumptions. The plural acronym RESPs is used to refer to multiple Regional Energy Strategic Plans.
- 2.22 **RESP Guidance** means the document of that name issued and amended by the Authority from time to time pursuant to Condition 54.7.
- 2.23 **RESP Methodology** means the methodology of that name describing how the ISOP will develop RESPs, approved by the Authority and the Secretary of State, in accordance with condition C19 of the ISOP’s Electricity System Operator Licence and condition C13 of the Gas System Planner Licence.
- 2.24 **RESP nations and regions** means a geographic area, listed in Appendix 1 and described in more detail in the RESP Guidance, for which a RESP is developed.
- 2.25 **Spatial Context** means a component of each RESP which provides a geospatial view of RESP Pathways against network data indicating network capacity requirements over the RESP nations and regions developed by the ISOP in line with the RESP Guidance.
- 2.26 **Specification of Strategic Investment Need** means a component of each RESP developed by the ISOP in line with the RESP Guidance which identifies areas of investment need within the RESP nations and regions which are of high economic and/or system value and necessary to the delivery of regional priorities as set out in the Nations and Regions Context.
- 2.27 **Strategic Board** means a governance body for the oversight of the oversight of the delivery and approval of each RESP that involves Distribution Services Providers and relevant holders of a Gas Transporter Licence with Distribution Networks<sup>9</sup>, devolved and local governments, and regional cross-sector bodies to provide oversight and steer to the RESP development process and strategic outputs, established by the ISOP in accordance with condition C19 of the ISOPs Electricity System Operator Licence and condition C13 of the Gas System Planner Licence.

## Associated Document – RESP Guidance

### Introduction

- 2.28 This section outlines the changes made to the Associated Document Part B – NESO Guidance following consultation. We also summarise stakeholder feedback received and explain why we have taken the decisions we have.

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<sup>9</sup> as listed in Appendix 1 to Standard Special Condition D23 of the Gas Transporter Licence

## Decision RESP – Licence Modifications

2.29 To reach this decision on the RESP Guidance, we have formally consulted twice, alongside working groups and extensive bilateral engagement.

### Explainer

2.30 The full proposed RESP Guidance is published in Annex E of this consultation.

2.31 Part C of the proposed Condition 54 of the Standard Licence conditions of the Electricity Distribution Licence and Condition D23 of Part D of the Standard Special Conditions of the Gas Transporters Licence introduces the RESP Guidance as an Associated Document to the licence. The RESP Guidance contains two parts: Part A – NESO Guidance and Part B – Network Guidance.

2.32 Part B of the RESP Guidance (applicable only to DNOs and GDNs) sets out:

- how the GDNs and DNOs are expected to participate in the RESP development, in particular, the RESP Methodology and the Strategic Boards; and
- details of how the GDNs and DNOs are expected to provide RESP Information to NESO, and further information about what we expect GDNs and DNOs to be asked by NESO.

2.33 For the avoidance of doubt, Part A of the RESP Guidance is not applicable to the DNOs and GDNs.

## Consultation Q4 regarding the RESP Guidance Part B

Q4. Do you agree that the changes made to Part B of the RESP Guidance since our policy consultation, as set out in Annex E, adequately reflects stakeholder feedback and defines the expectations for GDNs and DNOs in their participation of the RESP? Please provide the reasons and any alternative suggestions if you disagree.

### Summary of stakeholder responses

Most stakeholders expressed overall agreement with the changes made to the guidance. However, some respondents challenged the term ‘best endeavours’, aligned with feedback on licence modifications.

Stakeholders reiterated apprehensions about the handling and sharing of sensitive and confidential information within the RESP process and requested comprehensive details outlining how such information would be managed and protected throughout the process.

Stakeholders requested examples illustrating the type and format of information that the RESP would require from participants, and suitable timelines, be set out at Section 10.

Stakeholders also asked for a formal dispute resolution mechanism to be set out where participation levels are contested or a request for RESP Information is refused by a GDN/DNO.

In addition, there were requests for more information concerning voting rights on the Strategic Board.

## Decision RESP – Licence Modifications

Stakeholders noted the need to manage the transition between the tRESP and the RESP and the degree of change between the tRESP and RESP outputs.

### Ofgem Responses

- 2.34 As set out at paragraphs 2.9 and 3.9 – 3.12 above, our view remains that ‘best endeavours’ is the appropriate term for use in the licences and associated guidance, to affirm that networks must be fully and proactively engaged in the RESP development process, while NESO must ensure its requests for RESP Information are efficient, coordinated, and consistent.
- 2.35 We note the request for further information in the RESP Guidance on how sensitive information should be handled and processed by NESO, including for an update to Paragraph 10.3 of the guidance to reference the treatment of confidential information, commercially confidential information and information relating to critical national infrastructure. We note that NESO has existing obligations under Condition B7 of the ESO licence and B6 of the GSP licence, and provisions of the UK GDPR. The updated drafting of paragraph 3.24 further addresses this in obliging NESO to set out, in the RESP Methodology, its approach to balancing necessary commercial sensitivities and confidentiality requirements against transparency in development of the Specification of Strategic Investment Need output.
- 2.36 We recognise requests from stakeholders for more insight into the type and format of information that the RESP would require from participants under the auspice of requests for RESP Information. In requesting RESP Information from GDNs and DNOs as per paragraph 10.2 of the guidance, NESO will be subject to the obligations stipulated in paragraphs 2.22 – 2.30 of the guidance. This requires further detail regarding data sharing and requests, including expectations for stakeholder data and information sharing, be set out in the RESP Methodology. We therefore do not feel that it is within the scope of the RESP Guidance (as opposed to the methodology) to set out indicative examples of information that may be requested, nor to be prescriptive about the format that this information may be requested in.
- 2.37 We consider that there are already sufficient and proportionate routes for resolving any disputes that may arise where day-to-day collaboration is not working. In circumstances where a GDN or DNO considers a request for RESP Information from NESO to be inappropriate, or where NESO believes that a network is not meeting its RESP-related duties, the issue can first be raised directly between the parties. If it cannot be resolved informally, it can then be escalated through Ofgem’s established licence compliance and enforcement processes – including use of the issues log and, where necessary, formal investigation routes. Given the availability of these existing mechanisms, and Ofgem’s statutory powers to address

## Decision RESP – Licence Modifications

non-compliance, we do not consider it valuable or proportionate to introduce a distinct, prescriptive dispute resolution process at this stage.

- 2.38 Further clarification was sought on the voting rights of the Strategic Board, including the provision of a formal dispute resolution mechanism, where participation levels are contested. While we recognise the importance of setting out detail on voting mechanisms, we think this is best reflected in the RESP Methodology as stipulated by Paragraph 7.4 of the RESP Guidance. Several stakeholders noted the need to manage the transition between tRESP and the RESP, and the potential implications for DNOs' network development plans with regards to price control adaptability mechanisms and the degree of change between the tRESP and RESP outputs. We will set out our decision on this in our response to the ED3 Sector Specific Methodology Consultation, which closed on 3 December 2025.

## Send us your feedback on this decision

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this decision. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Do you have any further comments?

Please send your feedback to [stakeholders@ofgem.gov.uk](mailto:stakeholders@ofgem.gov.uk).