

Governance

CSNP Coordination Governance Document

Publication date: 01 April 2026

Contact: RIIO-3 Team

Team: Network Price Controls

Email: RIIO3@ofgem.gov.uk

Overview

This governance document is designed to support the delivery of the Central Strategic Network Plan, enabling whole-system network planning and supporting our funding decisions under RIIO-ET3. Strong collaboration between the Independent System Operator and planner, and electricity Transmission Owners is central to achieving these objectives.

This document sets out the roles, responsibilities, and reporting requirements for the independent system operator and planner electricity Transmission Owners 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 and data exchange processes and is designed to operate alongside them.

Document Version	Publication Date	Major/ Minor Amendments
1.0	1 April 2026	N/A

© Crown copyright 2026

The text of this document may be reproduced (excluding logos) under and in accordance with the terms of the Open Government Licence.

Without prejudice to the generality of the terms of the Open Government Licence, the material that is reproduced must be acknowledged as Crown copyright and the document title of this document must be specified in that acknowledgement.

This publication is available at www.ofgem.gov.uk. Any enquiries regarding the use and re-use of this information resource should be sent to psi@nationalarchives.gsi.gov.uk.

Contents

- Overview..... 1**
- 1. Introduction 4**
- 2. Overview..... 6**
 - Roles and responsibilities 6
- 3. Strategic Planning Data Reporting Principles 9**
 - Reporting principles 9
- 4. NESO Requirements11**
 - Introduction11
 - Reporting requirements11
 - NESO reporting requirements to Ofgem12
- 5. TO Reporting Requirements13**
 - Introduction13
 - Reporting requirements13
- 6. Submission of Representations by TOs.....15**
- Appendix 1 – Template for representations by TOs17**
- Appendix 2 – NESO report to Ofgem19**
 - NESO - CSNP Data Submission Report Template19

1. Introduction

- 1.1 This chapter sets out the background to the CSNP Coordination Governance Document, which applies exclusively to Electricity Transmission (ET) and does not extend to other energy sectors.
- 1.2 The Centralised Strategic Network Plan (CSNP) is a comprehensive whole-system planning framework. Its purpose is to identify and coordinate the most efficient investment 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 (TOs) and the National Energy System Operator (NESO)¹ 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 and TOs to undertake power system analysis, optioneering, and other activities needed to produce a robust CSNP. Coordinated inputs between the NESO and TOs help identify optimal investment pathways, manage interdependencies, and avoid duplication. This collaboration underpins Ofgem's ability to make informed funding decisions under RIIO-ET3.
- 1.4 This document is issued by the Authority² in accordance with Special Condition 9.22 of the TO's licence and Condition C17 of the electricity system operator licence. Together they set out the obligations relating to monitoring and reporting of CSNP-related information. This document should also be read in conjunction with the following:
 - CSNP Guidance Document³;
 - CSNP Methodology⁴;
 - RIIO-ET3 Final Determinations⁵;
 - Data Best Practice Guidance⁶;

¹ For the purposes of this document, the Independent System Operator (ISOP) as defined in Special Condition 1.1 will be referred to as the National Energy System Operator (NESO).

² For the purposes of this document, the Authority will be referred to as the Office of Gas and Electricity Markets (Ofgem).

³ https://www.ofgem.gov.uk/sites/default/files/2025-11/Centralised%20Strategic%20Network%20Plan%20guidance_0.pdf

⁴ The structured framework that sets out the principles, analytical steps, and assessment criteria used to develop the Centralised Strategic Network Plan.

⁵ <https://www.ofgem.gov.uk/decision/riio-3-final-determinations-electricity-transmission-gas-distribution-and-gas-transmission-sectors>

⁶ <https://www.ofgem.gov.uk/guidance/data-best-practice-guidance>

- Relevant STC and STCPs⁷ (including all associated System Requirement Forms⁸);

1.5 Regarding data sharing and coordination, this Governance Document sets out:

- Roles and responsibilities for NESO, TOs and Ofgem;
- Data submission requirements for both TOs and NESO;
- Reporting requirements for NESO to Ofgem; and
- Representation process regarding NESO's reporting to Ofgem.

1.6 The CSNP Coordination Governance Document is designed to complement, not replace, existing industry codes, procedures and relevant CSNP data exchange processes. This document establishes a principles-based framework for information exchange and reporting obligations critical to CSNP development, recognising that System Operator–Transmission Owner Code (STC) – alongside associated System Operator–Transmission Owner Code Procedures (STCPs) and associated guidance documents and data exchange forms, and the CSNP Methodology – alongside any relevant associated annexes and processes (together referred to as 'relevant CSNP processes' for the purpose of this document) will ultimately set out the requirements for data exchange across the CSNP lifecycle.

1.7 This governance framework will operate alongside all relevant CSNP processes and support their evolution and development as lessons are learned through each CNSP cycle.

1.8 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;
- the date on which Ofgem intends the amended CSNP Coordination Governance Document to take effect;
- the reasons for the amendments to the CSNP Coordination Governance Document; and
- A period during which representations may be made on the amendments, which will be up to 28 days unless Ofgem determines that a longer period is appropriate.

⁷ The STC and its associated STCPs are a set of codified rules and procedures that govern how NESO and the Transmission Owners coordinate, exchange data, and carry out their technical, planning and operational responsibilities.

⁸ SRFs are the operational data-collection vehicle NESO uses to gather consistent technical and planning information from TOs. It is not itself a code document and their use is set out in relevant STCPs ; it is a template governed by NESO's processes.

2. Overview

Roles and responsibilities

- 2.1 This chapter sets out the roles and responsibilities of NESO, TOs and Ofgem in coordinating the exchange of information necessary for the development of the CSNP. It establishes the requirement for each organisation to ensure clarity over who is responsible for sending and receiving specific types of data, and sets expectations for timely, transparent and well-managed communication flows.
- 2.2 The TOs and NESO must assign a person or persons within the respective organisations as coordinator to manage the sending and receiving of information that is relevant for the development of the CSNP.
- 2.3 Different people within the respective organisations may be assigned for specific types of data. The agreed contact details should be clearly referenced against each type of data exchange.

National Energy System Operator (NESO)

- 2.4 NESO is responsible for defining the data that TOs will submit to support the development of the CSNP, clearly articulating to TOs how and where in the CSNP lifecycle the data will be utilised; also recognising that aspects of relevant CSNP processes are mechanism through which reporting requirements will be set. This may include but is not limited to: specifying the data typology, format, level of detail, and timing of submissions – all of which must align with key stages of the CSNP lifecycle.
- 2.5 NESO must use best endeavours to set out the format of the data it requires and the channels through which that information should be submitted, recognising that the processes supporting CSNP activities will continue to evolve. NESO must specify interim formats, guidance, exchange routes and timelines that should be followed until updated processes are in place. NESO must communicate these requirements to TOs in a way that supports consistency, transparency and efficiency.
- 2.6 NESO must use best endeavours to clearly define a quality assurance methodology to help ensure data submitted into the CSNP process is consistent and complete.
- 2.7 NESO is responsible for ensuring the integrity, accuracy and internal consistency of all data it provides to TOs, including any derived or modelled outputs, and must maintain transparency by clearly communicating to TOs the planning assumptions, modelling assumptions, methodologies and parameters that underpin the development of the CSNP.
- 2.8 NESO must observe how effectively TOs are meeting the data submission requirements that are set out across relevant CSNP processes.

2.9 NESO must periodically submit to Ofgem a factual report detailing the degree to which the TOs have aligned with reporting requirements. This report must also inform Ofgem of the volume and types of data requested during the CSNP lifecycle, with specific references to the relevant CSNP processes.

Electricity Transmission Owners (TO)

2.10 TOs are required to provide to NESO information relating to the TOs assets and technical options for strengthening or upgrading the electricity transmission network with respect to the development of the CSNP. The information submitted to NESO must be accurate, complete, and timely data in the format and through the channels defined by NESO. TOs must use best endeavours to ensure that submissions meet any reasonable deadlines set out by NESO through relevant CSNP processes, and that data submissions align with any quality assurance methodology set by NESO.

2.11 The data that TOs will be required to provide to NESO set out in relevant CSNP processes may include but are not limited to the TOs:

- assets and asset condition;
- planned works;
- reinforcement options for both short- and long-term horizons as defined by NESO;
- project delivery dates and underlying justification;
- project 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.

2.12 Ofgem recognises that full compliance with Special Condition 9.22 (CSNP Coordination) of the TO's licence and with this Governance Document may not be fully achievable while the relevant CSNP processes are being updated to fully reflect the requirements of the CSNP. to avoid delay in the provision of information to NESOTOs must use best endeavours to follow any interim arrangements set out by NESO.

2.13 TOs are responsible for ensuring the integrity, accuracy and internal consistency of all data they provide to NESO, including any derived, modelled or third-party-informed outputs.

Joint responsibilities between TO and NESO

2.14 Whilst neither NESO nor the TOs control the timelines for updating certain industry codes such as STC and STCPs, both parties must work collaboratively to support any required updates that support the delivery of the CSNP.

- 2.15 NESO and the TOs are expected to work collaboratively to identify, develop, and implement data improvements. This includes amongst other thing, jointly proposing updates, refining data standards, and ensuring that any enhancements to data quality, formats, processes, or submission arrangements are progressed through the relevant CSNP processes.
- 2.16 Such collaboration must support consistency across industry processes, ensure transparency in how improvements are developed, and maintain alignment with the CSNP's strategic planning and regulatory requirements.
- 2.17 Both TOs and NESO must as soon as reasonably practicable, notify one another of any material changes to previously submitted data to maintain the integrity of the CSNP planning process and avoid planning against outdated assumptions/inputs.
- 2.18 Ofgem recognises that commercially sensitive information and third-party information may be shared between the TOs and NESO. Both parties must ensure appropriate procedures are codified in relevant CSNP processes to mitigate the unintentional sharing of sensitive information.

Ofgem

- 2.19 . Ofgem's role is to provide overarching regulatory oversight of CSNP Coordination, encompassing both the licence condition obligations and the requirements set out in this Governance Document. This oversight ensures that NESO's factual reporting on TO data submission is used transparently and proportionately to inform any improvements to CSNP-related data submission and coordination processes.
- 2.20 Ofgem will keep this governance document under review and will make any amendments in alignment with wider regulatory frameworks, industry codes and relevant CSNP processes.
- 2.21 Ofgem will review any representations made by TOs relating to NESOs report to Ofgem.

3. Strategic Planning Data Reporting Principles

Reporting principles

- 3.1 This chapter sets out the reporting obligations on NESO and the TOs, emphasising the need to use best endeavours to ensure effective, timely, accurate and consistent information exchange for the CSNP.
- 3.2 TOs and NESO should adopt common data standards and formats to maintain interoperability and comply with the most up to date version of Ofgem's Data Best Practice Guidance.
- 3.3 These reporting principles are intended to support effective information exchange for the CSNP and must be applied in a manner that is fully consistent with relevant CSNP processes. For the avoidance of doubt, nothing in this Governance Document shall override, amend, or substitute any requirements set out in relevant CSNP processes. As the relevant CSNP processes are further developed or updated, NESO and TOs must ensure that the application of these reporting principles remains aligned with those processes.
- 3.4 TOs and NESO must use best endeavours to observe the principles set out below to ensure:
 - **Timely submission of data** - means exchanging all relevant information required to support the development of the CSNP in line with:
 - deadlines set out in the relevant CSNP processes;
 - any earlier deadlines reasonably communicated by NESO where the information is needed for time-critical work; and
 - timescales for urgent or exceptional requests are clearly communicated between NESO and TOs.
 - **Quality data submissions** – means, in accordance with requirements set out in relevant CSNP processes, the data is:
 - accurate – correct, validated, and free from significant errors;
 - complete – including all fields, documents, assumptions and supporting information requested as well as relevant dependencies or interactions between submitted options, such as with known works that have other drivers;
 - consistent – follows specified formats, templates and terminology, and showing clear version control;
 - traceable – with methods, assumptions and sources clearly explained to allow for verification of how the information was produced.

- **Submissions reflect the most current information available** – means that data must reflect the most current information available to support the development of the CSNP. This includes providing updates to any information previously submitted where that information has changed in a way that could reasonably influence ongoing work in the development of the CSNP. Such updates may include but is not limited to:
 - supply and demand modelling;
 - identification of system needs;
 - technical options and their justification, including costs;
 - delivery dates and supporting evidence;
 - assessments of options proposed by either the TOs or NESO; or
 - information relating to environmental, community or planning matters.

TOs and NESO should notify each other as soon as reasonably possible of any information that requires updating, in line with the relevant CSNP timelines, where an update is significant enough to affect the CSNP.

4. NESO Requirements

Introduction

- 4.1 NESO's obligations apply across the entire CSNP planning cycle. They cover the quality and timeliness of data submissions from TOs, any issues that could impact CSNP delivery, and recommendations for improvement.
- 4.2 NESO must provide periodic reports to Ofgem on how well TOs are meeting the data-exchange requirements for CSNP activities. These reports give Ofgem visibility of TOs' alignment with the reporting expectations, highlight any issues that may affect CSNP development, and support proportionate and timely regulatory oversight.

Reporting requirements

- 4.3 NESO must use best endeavours to:
 - set out clear guidance for relevant CSNP processes that establish minimum data requirements and clear interpretation of information requests - including the data type, format, level of detail and submission timelines;
 - specify the timing and frequency of all required reports throughout the CSNP lifecycle, identifying which reports align with key milestones and which may be provided on an ad hoc basis;
 - publish a data reporting schedule that aligns with CSNP stages; and
 - establish a quality assurance methodology to ensure data submitted into the CSNP process are consistent and complete.
- 4.4 To enable TOs to develop robust and credible options for the CSNP, NESO must use best endeavours to provide timely, accurate and sufficiently detailed information to TOs. This includes sharing the planning assumptions, modelling inputs, and analytical outputs that TOs reasonably require in order to produce high-quality technical, economic and deliverability assessments.
- 4.5 Examples of information TOs may require from NESO include, but is not limited to:
 - future generation and demand background;
 - required power transfers across system boundaries;
 - ranking order for dispatch; and
 - modelling assumptions (e.g. agreed network configurations);
- 4.6 NESO must use best endeavours to communicate updates to TO inputs as soon as reasonably possible where changes are significant enough to affect TOs'

assessments and should do so using agreed formats and channels that are set out in relevant CSNP processes.

NESO reporting requirements to Ofgem

- 4.7 NESO must report periodically to Ofgem the performance of each TO relating to the data exchange requirements, as set out in relevant CSNP processes, for the development of the CSNP. This factual report underpins Ofgem’s regulatory oversight.
- 4.8 This report must be made available to TOs and Ofgem at the same time.
- 4.9 NESO may use the template set out in Appendix 2 or adapt it for reporting.
- 4.10 Where Ofgem identifies a pattern of repeated behaviour indicating that a TO has not been meeting data-submission requirements, as evidenced through NESO’s factual reporting, Ofgem may undertake a more detailed review to understand the underlying causes and assess any potential impact on the delivery of the CSNP. This may include but is not limited to:
- seeking further information from NESO and the relevant TO, issuing requests for clarification; or
 - seeking evidence of discussions through relevant CSNP processes.
- 4.11 If concerns persist, Ofgem may set out expectations or recommendations for corrective actions and, where appropriate, consider whether the behaviour constitutes a breach of licence obligations, initiating an engagement process with the relevant TO and NESO before determining any further regulatory action.

Timing of reports to Ofgem

- 4.12 NESO must submit this report periodically, in alignment with key CSNP milestones.
- 4.13 NESO must communicate with TOs and Ofgem on the expected timing for the reporting.
- 4.14 In addition, NESO must provide a Final Summary CSNP Data Submission Report to Ofgem no later than 31 March 2028 (three months after publication of the first CSNP), or such other date as directed by Ofgem. NESO must thereafter submit a Final Summary Report by the 31 March every three years, within three month of publication of each subsequent CSNP, unless directed otherwise by Ofgem.

5. TO Reporting Requirements

Introduction

- 5.1 This chapter sets out the reporting requirements that TOs must meet to support the development of the CSNP, including providing timely, accurate and complete data to NESO. It outlines the information TOs must supply across all stages of the CSNP process, with the expectation that submissions follow relevant CSNP processes. For the avoidance of any ambiguity, this chapter is intended to provide guidance on TOs' compliance with their obligations under Special Condition 9.22 to provide information and assistance to NESO, and the licence condition takes precedence where there is any inconsistency.
- 5.2 Timely, accurate, and complete data from TOs is critical to the successful delivery of the CSNP. NESO relies on this information to perform its 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.
- 5.3 Consistent and transparent reporting ensures that planning assumptions are reliable with interdependencies managed effectively. This enables Ofgem to make informed funding decisions under RIIO-ET3.

Reporting requirements

- 5.4 TOs must use best endeavours to provide timely, accurate and complete data to NESO throughout the CSNP planning cycle, in accordance with the relevant CSNP processes.
- 5.5 All submissions should follow the formats and timelines specified by NESO in relevant CSNP processes as set out in paragraph 1.6.
- 5.6 Information shared by TOs with the NESO 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.

5.7 In addition, TOs must use best endeavours to provide to the NESO any supporting information that may help them with key CSNP processes that include but not limited to:

- local model future supply and demand;
- Identifying system needs;
- Developing network reinforcement options;
- Assessing network reinforcement options.

5.8 Where a TO engages with third parties and have distinct working arrangements – such as joint ventures, consortia, or other collaborative structures – to develop network options, the TO 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 TO's accountability for reporting. TOs must clearly identify where third-party inputs have informed submissions and provide supporting evidence

6. Submission of Representations by TOs

Scope

6.1 TOs may submit representations to Ofgem where they consider that NESO's reporting, as provided under this Governance Document, contains factual inaccuracies, omissions, misinterpretations, or other matters that materially affect the fair and accurate reflection of the TO's performance in relation to CSNP data submission requirements.

Submission of Representations by Transmission Owners

6.2 Representations must be submitted promptly following the dissemination of NESO's report to TOs and in any event within the timeframe communicated by Ofgem for each reporting cycle. Each representation must be clear, evidence-based, and limited to matters directly pertaining to the content of NESO's report.

6.3 A representation must include, as a minimum:

- **A description of the matter raised**, identifying the specific section(s) of NESO's report to which the representation relates;
- **A summary of the TO's position**, including any relevant clarifications or corrections;
- **Supporting evidence**, such as data submissions, correspondence, version histories, or other documentation that substantiates the concern;
- **An explanation of any steps previously taken** to resolve the matter through informal engagement with NESO; and
- **The outcome sought**, including any correction, clarification, or explanatory addendum the TO considers appropriate.

6.4 Upon receipt of a representation, Ofgem may seek further information from the TO or NESO, issue supplementary questions, or convene discussions as required to determine whether any amendment, clarification, or follow-up action is necessary. Ofgem will communicate its determination in writing to all relevant parties.

6.5 Submission of a representations does not limit or preclude the use of formal dispute processes between the TO and NESO, as set out under relevant CSNP processes, where applicable. However, TOs are expected to exercise discretion and use representations only where they consider that the matter raised is material to the accuracy, fairness, or completeness of NESO's reporting.

Outcomes

6.6 Ofgem's assessment may result in, but is not limited to:

- confirming the accuracy of NESO's factual reporting;
- directing NESO to amend, reissue, or withdraw elements of its report;
- clarifying the interpretation of data submission requirements for the purposes of the reporting cycle;
- recommendations on improvements relating to any relevant CSNP process; or
- determining that no change is required.

6.7 Ofgem will make its decision available in writing to all relevant parties, setting out the reasons for its decision.

Appendix 1 – Template for representations by TOs

Overview

A1.1 TOs must use the template set out in this appendix when submitting a representation to Ofgem.

Template

To: The Authority

From: [Your organisation name]

Date: [DD/MM/YYYY]

1. Matter raised

Provide a clear description of the issue forming the basis of the Representation, including:

- the specific section(s) of NESO's CSNP Data Submission Report to which the Representation relates;
- the factual inaccuracy, omission, misinterpretation, or other concern identified; and
- why the matter is considered material to the fair and accurate reflection of the TO's performance.

2. Background and context

Explain the circumstances leading to the Representation, including:

- relevant CSNP activities, submissions, or exchanges;
- any prior attempts to resolve the matter through the informal resolution process;
- references to supporting correspondence, meeting notes, or agreed assumptions; and
- the timeline of events relevant to the issue raised.

3. TO position and supporting evidence

Set out the TO's position, supported by evidence that may include, but is not limited to:

- submitted data, including versions and timestamps;
- validation logs, technical documentation, or modelling inputs;
- email exchanges, meeting summaries, or clarifications requested or provided;
- relevant CSNP process provisions;
- any factual information of any actions previously taken to address the issue;
- any other documentation substantiating the TO's view.

Evidence should be annexed or clearly referenced.

4. Outcome Sought

Specify clearly and precisely:

- the correction, clarification, or amendment sought to NESO's report;
- any proposed additions, explanatory notes, or rectifications;
- where relevant, any requests for further information or evidence from NESO;
and
- any recommendations for preventing similar issues in future reporting cycles

Appendix 2 – NESO report to Ofgem

NESO - CSNP Data Submission Report Template

Overview

- A2.1 This report must provide Ofgem with NESO’s factual assessment of an individual TOs performance in meeting CSNP-related data submission requirements, including timeliness, quality, completeness, and any material issues impacting the CSNP planning cycle.
- A2.2 NESO may amend or adapt this template as necessary for the purposes of its reporting obligation.

Template

Reporting Period: [Set out timing and how it aligns with the CSNP life-cycle]

Submission Date: [DD/MM/YYYY]

1. Executive Summary

Provide a concise overview covering:

- key reporting outcomes across the TO;
- major milestones achieved during the reporting period;
- overall consistency and quality of TO’s data submissions;
- any revisions, clarifications, or interim arrangements implemented since the previous report.

2. Observations overview

High-level observations and performance commentary for each TO.

Data requirement	Status	Evidence	Comments
------------------	--------	----------	----------

3. Data Assessment

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

Data Category	CSNP Process reference (for example part xx of SRF Guidance -X)	Completeness	Accuracy	Timeliness	Overall Rating
---------------	---	--------------	----------	------------	----------------

4. Appendices

Attach detailed compliance evidence.