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Subject: Request for a direction under C17 (Centralised Strategic Network Plan) of the electricity system operator (ESO) licence and C12 (Centralised Strategic Network Plan) of the gas system planner (GSP) licence.

Dear Konark,

### **The licence background**

National Energy System Operator Limited (NESO) has the following licence obligations:

- ESO licence condition C17.16 – *‘By 1 June 2027 and by 1 June of every third year thereafter, the licensee must (unless otherwise directed by the Authority) submit to the Authority for approval the proposed CSNP.’*
- ESO licence condition C17.18 – *‘By 31 December 2027 and by 31 December of every third year thereafter, (unless otherwise directed by the Authority) the licensee must publish the CSNP in accordance with the latest CSNP Methodology (or other date as directed by the Authority and in a form approved by the Authority as set out in the Centralised Strategic Network Plan Guidance).’*
- GSP licence condition C12.16 – *‘By 1 June 2027 and by 1 June of every third year thereafter, the licensee must (unless otherwise directed by the Authority) submit to the Authority for approval the proposed CSNP.’*
- GSP licence condition C12.18 – *‘By 31 December 2027 and by 31 December of every third year thereafter, (unless otherwise directed by the Authority) the licensee must publish the CSNP in accordance with the latest CSNP Methodology (or other date as directed by the Authority and in a form approved by the Authority as set out in the Centralised Strategic Network Plan Guidance).’*



## Request for a direction

We request Ofgem issues a direction for us to publish the first Centralised Strategic Network Plan (CSNP) by 15 December 2028 instead of 31 December 2027 (ESO C17.18 and GSP C12.18). Additionally, we request that Ofgem issues a direction for us to submit the CSNP to Ofgem by 15 September 2028 instead of 1 June 2027 (ESO C17.16 and GSP C12.16).

We note that this will require a subsequent direction to the timing of future CSNPs.

## The need for change

We are delivering the first joined up strategic energy plans needed for Great Britain (GB) to decarbonise its energy systems and drive economic growth. Through our Spatial Strategic Energy Plan (SSEP) and then the CSNP, we will plan strategically, allowing for the integration of different energy sources and technologies in the future, enhancing the resilience of the transmission networks.

The CSNP needs outputs from the SSEP process as a key input. Therefore, to align to the revised dates for the SSEP<sup>1</sup> decisions and publications, the CSNP timeline needs to be adjusted. Since December 2025 (SSEP announcement), we have been replanning the CSNP timeline to account for the changes to the availability of SSEP outputs and to ensure that the requirements as set out in Ofgem's CSNP Guidance document<sup>2</sup> can be met.

Maintaining the current dates in the licences conditions would result in an extensively compressed timeline, leading to:

1. significant reductions in the quality of the plan, leading to additional workload for Ofgem to be able to approve the plan
2. less opportunity for our stakeholders to participate in the CSNP and to provide meaningful feedback on the CSNP proposals
3. differing consultation timelines for the draft plan and environmental assessment, resulting in delays in approving the CSNP
4. less assurance that the plan is deliverable, resulting in leading to delays in implementation and ultimately, unnecessary costs to consumers.

## Impacts and mitigations of delay

We acknowledge that any extension to the current CSNP dates may result in delays to transmission network investments required to decarbonise the energy systems in GB and for stakeholder access to accurate network data required for downstream processes.

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<sup>1</sup> NESO, [NESO outlines new timelines for Strategic Energy Plans | National Energy System Operator](#)  
NESO, [NESO Open Letter to Industry](#)  
DESNZ, [Strategic Spatial Energy Plan \(SSEP\): timeline update \(letter to NESO\)](#)

<sup>2</sup> Ofgem, [Centralised Strategic Network Plan | Ofgem](#)



These potential risks are alleviated by the refresh of the second transitional Centralised Strategic Network Plan (tCSNP2r) and Electricity Ten Year Statement (ETYS) which will be published in summer 2026. The tCSNP2r will provide signals for electricity transmission projects in the 2030s, keeping network build on track and providing the foundation for the CSNP analysis. The updated ETYS dataset will ensure that the downstream processes, including charging and balancing continue to have timely access to the information required.

Additionally, there is expected to be no significant impacts for gas networks as we are expecting to mitigate this by delivering our gas system planner C8 licence condition for Gas Network Capability Needs Report (GNCNR) and Gas Options Advice (GOA) within CSNP. The last GNCNR and GOA were delivered last year, and these will provide gas networks with the network requirements and guidance until the CSNP is published.

### **Proposal benefits**

The request does not seek extra time to complete the CSNP, rather the ask is that the previously agreed time allocation is protected. This will enable us, in collaboration with the CSNP's delivery partners, to successfully publish and implement the first CSNP while ensuring appropriate engagement and consultation with our stakeholders.

The updates to the CSNP programme will:

1. allow meaningful and tailored stakeholder engagement throughout each of the CSNP steps
2. ensure adequate time is available for the development of network options from both licensed and non-licensed parties
3. provide stakeholders with sufficient time to consider and refine the indicative electricity offshore design
4. allow a joint consultation on the proposed whole system network plan and the associated environmental assessments, ensuring efficient use of our stakeholders' time
5. provide time for all parties to complete the required analysis as set out in the CSNP Guidance document
6. provide certainty to the industry on longer-term network needs.

By revising the plan submission date to Ofgem, it will retain the opportunity and time available for stakeholders (included licensed parties) to participate, contribute and ultimately shape the first CSNP.

The revised submission date will enable Ofgem's approval of the CSNP, as it will ensure that there is sufficient time to produce the plan at the quality necessary for Ofgem approval which allowed to fully consider of all stakeholders' responses. Ofgem will continue to have full visibility of the development of CSNP as part of regular discussions between us and as a principal member of the CSNP governance.



The delivery of the CSNP is intrinsically linked to the other strategic energy plans and extensive collaboration with the CSNP's delivery partners. We will continue to provide regular updates to Ofgem on the CSNP programme timeline (see annex) and associated dependencies.

### **Conclusion**

We acknowledge that any delays to the delivery of the first CSNP are unwanted, however the proposed changes to the timings are necessary to provide certainty on longer-term network needs, contributing to economic growth, energy security and a sustainable energy future.

To summarise, we request a direction from Ofgem under the licence conditions:

- ESO C17.18, to delay the first CSNP publication to 15 December 2028 from 31 December 2027
- ESO C17.16, to delay the first CSNP submission to Ofgem for approval to 15 September 2028 from 1 June 2027
- GSP C12.18, to delay the first CSNP publication to 15 December 2028 from 31 December 2027
- GSP C12.16, to delay the first CSNP submission to Ofgem for approval to 15 September 2028 from 1 June 2027.

For the reasons outlined in this letter, could you consider our request and confirm your agreement at your earliest convenience. Please contact Lilian Macleod (electricity) and Luke Culter (gas and hydrogen) if you'd like to discuss this further or require any additional information.

Yours sincerely

Dr Paul Wakeley (Head of Electricity Network Strategy) and Angus Paxton (Head of Gas and Whole Energy Network Development)



### Annex – CNSP Programme Timeline

CNSP programme timeline

