

Decision

Future Energy Pathways Guidance

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Future Energy Pathways explore different ways of meeting GB-wide energy supply and demand needs as we progress to the 2050 net zero target.

The Pathways and their underlying analysis are used by a large range of stakeholders to inform gas and electricity network investment and operability, market design, security of supply planning, and industry forward planning in general, as well as academic research, policy development, and technology innovation.

National Energy System Operator Limited (NESO) have new licence conditions requiring it to produce Future Energy Pathways, and a Methodology for developing them.

In August 2024 we consulted on an associated Guidance document to those licence conditions, setting out in more detail how we expect NESO to fulfil its obligations.

This document sets out our decision on that consultation, and alongside it on our website we have published the final version of the Guidance document.

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1. Introduction

Overview

- 1.1 The UK is committed to delivering a clean power system by 2030, and a net zero energy system by 2050. The scale of this challenge requires all energy system actors to move to a more focused, directional, view of the future that is clearer about what that system will look like in the intervening years.
- 1.2 In recognition of that urgency, we have asked NESO to move away from their previous approach to 'Future Energy Scenarios', which outlined a variety of potential futures, to 'Future Energy Pathways', which explore credible pathways to deliver Great Britain's 2050 net zero and interim emissions targets.
- 1.3 In parallel, NESO are developing a Strategic Spatial Energy Plan (SSEP). This plan is a GB-wide plan out to 2050, assessing the optimal locations, quantities and types of energy infrastructure required to meet our future energy demand. NESO expects to publish the final SSEP by the end of 2026.
- 1.4 The SSEP will act as the underpinning analysis to inform the network infrastructure needed to ensure that energy supply can reach demand. This work will also be done by NESO, via their Centralised Strategic Network Plan (CSNP), which will be published in 2027. NESO will also be producing Regional Energy Strategic Plans (RESPs) that set net zero regional energy pathways that align with local needs and have local democratic oversight. The RESP pathways will provide the local contribution and information to the national requirements identified by the SSEP, as well as provide analysis for local network development.
- 1.5 We acknowledge that in the future there may be information needed for network planning – at both national and regional levels – that will not be contained in either the SSEP or the RESPs. We will require NESO to lay out, as part of its July 2025 pathways publication, how it sees the role of the Future Energy Pathways developing once the SSEP and the RESPs are in place.

Context for publication

- 1.6 National Energy System Operator Limited (NESO) is required by its licences to produce Future Energy Pathways that model GB-wide energy supply and demand for electricity and gas (including natural gas and hydrogen).
- 1.7 In December 2023 we published our decision on how the previous future energy scenarios should evolve into future energy pathways, to help inform future

network investment needs. We said we would implement our decision via licence conditions for NESO, which were consulted on, finalised, and published in 2024¹.

- 1.8 As part of that decision, we said we would provide further guidance to NESO on how to fulfil its obligations under those licence conditions, and we consulted on a draft version of that guidance in August 2024².
- 1.9 Having carefully considered all responses to that consultation, we have updated the draft guidance to provide further detail on the process, procedures and considerations NESO must take into account when producing both the pathways, as well as their methodology for developing those pathways.

Our decision-making process

- 1.10 We consulted on the eight sections of a draft version of the Future Energy Pathways Guidance (Guidance), asking if respondents thought it aligned with the decisions we made in December 2023. Respondents had three options: 'Yes', 'No' or 'I'm not sure' – for the latter two, respondents were asked to explain why and give evidence if possible.
- 1.11 We received 21 responses to the consultation, none of which indicated they were to be treated as confidential. We have taken into consideration all responses when making our decision, and have summarised the key points received and provided reasoning for our decision. All responses have been published alongside this decision document on our website.

¹ [Designation of the National Energy System Operator \(NESO\) - GOV.UK](#)

² [Future Energy Pathways \(FEP\): draft guidance - Ofgem - Citizen Space](#)

Decision-making stages

| Date | Stage description |
|-------------|--|
| 13/08/2024 | Stage 1: Consultation open |
| 13/09/2024 | Stage 2: Consultation closes (awaiting decision), Deadline for responses |
| 28/02/2025 | Stage 3: Responses reviewed and published |
| 28/02/2025 | Stage 4: Consultation decision/policy statement |

General feedback

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

1. Do you have any comments about the overall quality of this document?
2. Do you have any comments about its tone and content?
3. Was it easy to read and understand? Or could it have been better written?
4. Are its conclusions balanced?
5. Did it make reasoned recommendations?
6. Any further comments

Please send any general feedback comments to stakeholders@ofgem.gov.uk.

2. Develop a set of strategic pathways to net zero

Section summary

In our consultation we asked if the proposed guidance aligned with our previous decision setting out the requirements for NESO to model and develop multiple, longer-term strategic pathways and a single short-term pathway.

Having considered all responses, we have decided to amend the text of the Guidance to provide further clarity on the presentation of progress towards targets in the pathways, on issues affecting deliverability and costs, and of use of the pathways.

Q1. Do you agree that section one of the draft guidance aligns with the decisions we made in December 2023?

Decision

- 2.1 We have amended the text of the Guidance slightly to clarify that NESO must highlight where government policy ambitions have been met or missed, but that we do not expect the licensee to provide subjective commentary on the government’s design of any related policy framework.
- 2.2 We have added a requirement for NESO to highlight costs in the pathways where possible, noting the challenge of predicting eg financeability or workforce skills out to 2050.
- 2.3 We have also added a requirement for NESO to include in its FEP publication an explanation of how the outputs of the FEP will be used in their various strategic planning roles.

Respondents’ views and our rationale for change

- 2.4 We received 20 responses to Question 1, covering a broad range of topics. The majority of respondents explicitly agreed that the Guidance aligned with our decision to set out strategic pathways rather than scenarios. No stakeholders thought the Guidance departed from the December 2023 decision. There was support for a variety of different long-term pathways representing alternative routes to net zero, and an emphasis on the need for the pathways to utilise a whole system approach with all energy vectors included.
- 2.5 Two respondents were concerned that requiring NESO to indicate where government ambitions were not being met might lead NESO into overly political ground. We do not consider this to be a risk; in fact, highlighting where a policy may fall short of its desired intent will be valuable information for policy makers

seeking to maximise the effectiveness of their decisions. We do not expect NESO to provide subjective commentary on the design of any government policy that may lead to missed goals, merely to highlight any such occurrences. For example, NESO may highlight that domestic uptake of heat pumps has not met the desired level in 2035, due to low uptake levels in specific regions. We do not expect NESO to then provide a critique of why the policy did not sufficiently motivate demand in those regions, but we do expect NESO to comment on factors that are known, such as workforce or financeability constraints. We have amended to text of the Guidance to clarify this.

- 2.6 There were a range of views on the specificity and timing of moving to a single short-term pathway and its optimum length. Four respondents were in favour of flexibility on the number and length of pathways. Three respondents wanted a longer short-term pathway and one wanted a shorter short-term pathway. Two respondents wanted no single short-term pathway.
- 2.7 Particularly given this diversity of opinion, we are not inclined to revisit our decision on this topic, which required NESO to consult with their stakeholders on the length of the short-term pathway before coming to a decision. This may need to remain an iterative process for a few years, as other strategic planning processes and outcomes provide more certainty in their turn (such as tCSNP, SSEP, RESP, and CSNP outputs³).
- 2.8 Four respondents raised the importance of workforce modelling as part of a deliverability component of the pathways. Another three respondents highlighted that consumer behaviour also affected deliverability. We have updated the Guidance to include these issues as examples of considerations NESO should take into account when producing pathways.
- 2.9 One respondent thought that infrastructure requirements should be included as part of any overall deliverability assessment. We agree that infrastructure is a vital component of delivering net zero, but the pathways are only intended to show how supply and demand may be balanced in differing routes to get to net zero, albeit with clear implications for subsequent network need. It is the CSNP and the networks' business plans that will pick up on the actual optioneering and identification of solutions to provide that network, not for the pathways themselves.

³ These are: transitional Centralised Strategic Network Plan (CSNP), Strategic Spatial Energy Plan (SSEP), Regional Energy Strategic Plan (RESP), and Centralised Strategic Network Plan (CSNP).

- 2.10 Two respondents highlighted requested including indicative costs, where these could be measured, to facilitate the comparison of pathways at various stages. We think this could be useful information for policy makers and industry, but acknowledge the challenges in providing comprehensive costs out to 2050, both within and across pathways. We have amended the Guidance to require NESO to include such costs where possible, rather than an absolute requirement.
- 2.11 In addition to the questions we asked, a high number of stakeholders also requested that NESO provide an explanation of how it will use the various outputs of the pathways, the SSEP, and the RESPs in practice, and particularly to inform the CSNP.
- 2.12 We agree that clarity on this point is needed, to reassure stakeholders that NESO will not be running redundant programmes, or programmes with contradictory outputs that reduce confidence in the analysis for investment decisions. We have amended the Guidance to require NESO to publish within its FEP publication an explanation of how the outputs of the FEP will be used in its various strategic planning roles. This includes which FEP outputs will be used to supplement the SSEP outputs to inform the CSNP, and the feedback loop proposed between the various planning tools (FEP, SSEP, CSNP, RESPs).

3. Types of pathways and presentation of non-delivery of net zero futures

Section summary

In our consultation we asked if the proposed guidance aligned with our previous decision setting out the requirements for NESO to produce main pathways that meet net zero, plus a counterfactual showing the implications of not meeting net zero.

Having considered all responses, we have decided to amend the guidance to require more detail on interim targets, and to provide greater clarity on the use of the counterfactual.

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| Q2. Do you agree that section two of the draft guidance aligns with the decisions we made in December 2023? |
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Decision

3.1 We have made minor textual amendments to the Guidance to include a requirement that an explanation should be given where interim or regional targets are missed, to make the purpose of the counterfactual clearer, and to clarify NESO's role in determining the number of pathways.

Respondents' views and our rationale for change

3.2 We received 16 responses to Question 2, the majority of whom specifically stated they agreed that the Guidance implemented our decision. Most responses focused on the detail and uses of the counterfactual.

3.3 Five respondents asked for further clarity on which targets must be met, and which interim targets could be missed. We agree that the Guidance could be clearer. We have amended the text to clarify that the legally binding carbon reduction targets are the carbon budgets and net zero by 2050 target, as set out in the Climate Change 2008 Act⁴, and to require that the reasons for missing regional targets should be transparent, and where pathways do not meet these, an explanation should be provided.

3.4 Two respondents wanted further detail on the intended uses of the counterfactual. For the counterfactual, we have articulated that its purposes

⁴ Climate Change Act 2008 (as amended)

include assisting policy makers to identify where existing policies are insufficient, in order to target resources and policies.

- 3.5 One stakeholder said that the draft guidance did not clearly specify who is ultimately responsible for deciding the appropriate number of net-zero pathways following the consultation. We have tightened the language in the Guidance to make clear that NESO will make this decision after consulting stakeholders, and subject to approval by Ofgem when the Methodology is submitted.
- 3.6 Two stakeholders suggested that the potential proposals being considered in the Review of Electricity Market Arrangements (REMA) should be factored into the modelling of FEP pathways. We agree that any potential decisions in this area will naturally affect build, costs, and placement data, but until such decision is made it is not possible for us to dictate how NESO should react to it. We do expect NESO to regularly review the impact of changing policies on development of the pathways, and have added a clause to that effect in section 8 of the Guidance, that covers changes in policy more generally as relating to NESO’s strategic planning role.
- 3.7 Two stakeholders thought that requiring the counterfactual to show potential network development, economic and financial implications of falling short, was outside the remit of the pathways. We agree that the solutions to these implications do sit elsewhere in the strategic planning process, such as in CSNP for network development. But the counterfactual is intended to highlight the consequences of continuing with current policies, and by definition that includes data that shows where network build fails to keep pace with demand, or where the costs of catching up to meet net zero targets may exceed the costs of earlier activity. We require this to be highlighted where it can be shown.

4. Time horizon for pathways

Section summary

In our consultation we asked if the proposed guidance aligned with our previous decision setting out the requirements for NESO to create pathways up to at least 2050 to align with the net zero by 2050 requirement.

Having considered all responses, we have decided to amend the text of the Guidance to clarify NESO's role in extending the pathways, and its treatment of assets extending beyond 2050.

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| Q3. Do you agree that section three of the draft guidance aligns with the decisions we made in December 2023? |
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Decision

4.1 We are not changing our decision on the 2050 horizon, but have amended the Guidance to clarify how NESO should engage with stakeholders on the correct time and circumstances in which they might do so, subject to Ofgem's approval. We have also clarified that we expect to see, for example, the lifetime of assets that extend beyond 2050 taken account of in the Methodology data and assumptions.

Respondents' views and our rationale for change

- 4.2 We received 11 responses to Question 3, the majority of which stated that the Guidance reflected our decision.
- 4.3 Nine respondents said that they would prefer an extension of the time horizon of the pathways to include either a rolling 25-year window, or to consider the life-time asset cost in some other manner.
- 4.4 We will leave the requirements in the Guidance as they are. We accept the points made by stakeholders regarding life-time asset costs of over 40 years in some cases, and expect NESO to account for those in its underlying data and assumptions. But we do not see the case for the pathways themselves to stretch past 2050 as yet. We have no settled policy or targets past this date, so it is difficult to direct NESO as to what they should make such a pathway achieve.
- 4.5 We have however, amended the text of the Guidance to clarify that NESO should include in the Methodology a clear approach to consult with stakeholders on the times and triggers for extending the pathway timescales. NESO must also account

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for the lifetime of assets, benefits, and other long-term costs extending beyond 2050 in the underlying data and assumptions used in the Methodology.

5. Treatment of high-impact, low-probability events

Section summary

In our consultation we asked if the proposed guidance aligned with our previous decision setting out the requirements for NESO that the Future Energy Pathways model should be capable of incorporating, and testing, extreme data ranges that are high impact, low probability (HILP).

Having considered all responses, we have decided to amend the text of the Guidance to include more examples of HILPs, and to include an exception for potential security risks.

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| Q4. Do you agree that section four of the draft guidance aligns with the decisions we made in December 2023? |
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Decision

5.1 We have amended the Guidance to include an additional publishing exception for potential security implications, and included a few more examples of HILPs in the (non-exhaustive) list given in the Guidance.

Respondents' views and our rationale for change

5.2 We received 16 responses to Question 4, 7 of whom explicitly agreed with the question, and the majority of whom had additional suggestions to make.

5.3 A number of stakeholders wanted reassurance that there would be stakeholder engagement on the treatment of HILPs in the FEP modelling capacity; we consider that the Guidance contains adequate requirements in this regard and so do not propose to make changes.

5.4 A majority of stakeholders also gave additional examples of things that might be considered HILPs to add to the list in the Guidance. We are wary of providing too many examples, as the list is intended to be indicative of type, not an exhaustive coverage of all potential HILPs. NESO must consult with stakeholders on the type (and treatment) of HILPs it will explore, and we expect stakeholders to engage fully with that process to identify the most appropriate method of identification.

5.5 One stakeholder stated that NESO should not just set out a process to develop its HILP modelling capability, but also set out a timetable for doing so. We agree with this point and have amended the Guidance to make this a requirement for the Methodology, to be submitted to Ofgem for approval.

- 5.6 One stakeholder queried the lack of definitions for 'risk appetite' in the context of HILP analysis helping to inform decisions on appropriate risk appetite for system need. We do not think a definition is required here, mainly because the decisions being made will be made under separate processes, such as the CSNP for future network build. The CSNP will have its own requirements for dealing with risk, and should not be fettered by definitions made in this Guidance. As HILPs will not be included in the pathways themselves, we consider the risk of a low probability event causing an overly risk averse approach in a pathway is not likely to materialise.
- 5.7 One stakeholder was concerned that publishing too much detail about resilience to an event could inadvertently provide parties with insights that could compromise the security of the system. We recognise this risk and have amended the Guidance text to clarify that we expect such analysis should be submitted to Ofgem on a confidential basis rather than made publicly available.
- 5.8 NESO responded to the consultation to say that it thought HILP analysis should sit outside of the FEP publications. Whilst we agree that HILP analysis should not form part of the published pathways themselves, we do not agree that the capability and assumptions made for HILP testing should be separated from the FEP process. Stakeholders need to have assurance that the appropriate considerations, parameters, and uncertainties have been considered when creating the underlying analysis for the pathways. As such, we have not amended this requirement in the Guidance.

6. Incorporating network constraints into the modelling

Section summary

In our consultation we asked if the proposed guidance aligned with our previous decision setting out the requirements for NESO to factor in network constraints in the short term only.

Having considered all responses, we have decided to amend the Guidance to include additional consultation requirements on definitions, to expand the requirement to model constraints to the gas sector, and for NESO to work on further developments for both gas and distribution level modelling.

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| Q5. Do you agree that section five of the draft Guidance aligns with the decisions we made in December 2023? |
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Decision

6.1 We have amended the Guidance to be explicit about the requirement for NESO to model gas constraints, as well as electricity constraints. We have dropped the requirement for NESO to model constraints within the distribution system in the next iteration of the FEP in 2025, and clarified that constraints should be modelled down to the grid supply points on distribution systems. We have included new requirements for NESO to set out the process and timescale for incorporating distribution level data and gas constraint data in further iterations of the FEP.

Respondents' views and our rationale for change

6.2 We received 19 responses to Question 5, the majority of whom made suggestions for further clarity in the Guidance.

6.3 Four respondents highlighted that a whole system pathway must include consideration of potential gas network constraints, as well as electricity. We agree; now that NESO has a remit to consider all energy vectors in its planning roles, the impact of changes in markets and infrastructure for gas will have direct impacts on its planning for the electricity system, and vice versa. However, it will take NESO some time to adapt the FEP modelling process to incorporate gas data and modelling systems, which will not be possible for the pathways due in July 2025. As such, we have amended the Guidance to say that NESO must set out in

- its next Methodology how the inclusion of gas modelling will be achieved, and on what timescale.
- 6.4 One respondent suggested including water restraints also as it is a key factor for hydrogen production. However, the pathways will not be spatially placing hydrogen production, so as water availability differs across GB we consider any analysis would be speculative and of limited practical use.
- 6.5 Five respondents requested an explicit requirement for NESO to consult with stakeholders on the definition of near and long term for the purpose of modelling constraints. We agree that engagement and transparency on this issue will increase confidence in the outputs of the FEP, and so have included this requirement in the Guidance.
- 6.6 One respondent thought distribution level modelling was unnecessary, stating that distribution level planning is short term demand led, and so capacity can be provided speedily when need arises on the distribution system. They considered that it was transmission level reinforcement only that can take many years to materialise and so required more forward planning.
- 6.7 However, other respondents thought distribution level modelling – particularly in the context of constraints – should be included, or at least down to the 132kV level. We agree that distribution networks – gas and electricity – form a substantial part of the potential constraint issues leading to siting of generation and economic development, and as such should be modelled. However, it will take NESO some time to adapt the FEP modelling process to incorporate distribution level data and modelling systems, and to clarify exactly how this modelling work will interact with the Regional Energy System Plan modelling work being developed. As such, we have amended the Guidance to say that NESO must set out in its next Methodology how this will be achieved, and on what timescale.
- 6.8 Two respondents queried whether voltage constraints should be considered alongside thermal constraints, as voltage constraints are a substantial cost to the system, albeit not on the same scale as thermal constraints. However, with renewable generation increasing substantially in the coming year, voltage constraints may also rise.
- 6.9 It is a valid point, but we think that the Centralised Strategic Network Plan (CSNP) is the correct process for scrutinising voltage constraints. The FEP produces pathways that show different possibilities for supply and demand to be met out to 2050, with subsequent implications for network build. What it is not

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designed to do, is then explore that potential network build in any level of detail. Potential voltage constraints would depend on the nature of the network solution being proposed, and that is where the CSNP will pick up this issue in its operability assessments. As such, we will not be including this issue in the FEP Guidance.

7.Improvements to transparency in analysis and outputs

Section summary

In our consultation we asked if the proposed guidance aligned with our previous decision setting out the requirements for NESO to follow open data best practice, and demonstrate how its key decisions in this area were taken.

Having considered all responses, we have decided to amend the Guidance to clarify requirements for confidential treatment and validation of data, and NESO’s audit of the process.

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| Q6. Do you agree that section six of the draft guidance aligns with the decisions we made in December 2023? |
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Decision

7.1 We have amended the Guidance to give examples of reasons for which NESO may not publish all the data, assumptions, models, or algorithms that it has used. We have also added further clarity to the requirement to explain the rationale for adopting (or not) stakeholder feedback, and that NESO should highlight where they have not been able to validate external data.

Respondents’ views and our rationale for change

- 7.2 We received 14 responses to Question 6. The majority specifically stated that they agreed with the requirements
- 7.3 Four respondents raised concerns about the NESO’s approach to treatment of sensitive data. Although the Guidance already contains a requirement for NESO to be clear with stakeholders how their sensitive data will be treated, we have clarified a requirement for NESO to obtain bespoke agreements with external providers of data where necessary to protect critical datasets. We expect stakeholders by default to share all data possible now that NESO is a public body.
- 7.4 One respondent stated that NESO should validate any external data that was used. We do not consider that this will always be possible and so will not make it a requirement. We have however, included a requirement that NESO should highlight their level of confidence in the integrity of external data inputs used.
- 7.5 Another respondent wanted to see greater clarity on how stakeholder responses were considered. We think it will provide greater confidence in the resulting

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pathways to understand how concerns have been dealt with, and so have amended the Guidance to include a requirement to provide a rationale for adoption or rejection of stakeholder feedback.

8. National and regional outputs

Section summary

In our consultation we asked if the proposed guidance aligned with our previous decision setting out the requirements for NESO to produce national and regional pathways.

Having considered all responses, we have decided to amend the guidance to reflect stakeholders preference for more granular regional data, but not presented as regional pathways.

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| Q7. Do you agree that section seven of the draft guidance aligns with the decisions we made in December 2023? |
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Decision

8.1 We have amended the Guidance from our consultation version to remove the requirement for the FEP to produce regional pathways, but to clarify the expectations of useability of the granular regional datasets that NESO should publish.

Respondents' views and our rationale for change

8.2 We received seventeen responses to Question 7. The majority of these agreed that FEP should provide more granular detail at regional and vector level, but most also felt that regional pathways were no longer an appropriate presentational output for FEP.

8.3 Since we consulted on the draft FEP Guidance, the role and timescales for NESO's production of RESPs have clarified. We expect NESO to develop regional pathways, that model supply and demand, as part of the development of a smaller scope transitional RESP in Autumn 2025, and then on an enduring basis from the end of 2027.

8.4 Given this earlier timeframe, we consider that FEP has no need to produce a separate set of regional pathways. FEP should instead focus on providing the appropriate datasets that allow stakeholders to spatially map demand and supply factors relevant to their specific requirements.

8.5 Later in spring 2025 we will be publishing our decision on the RESP policy framework setting our expectations for how NESO should develop the RESP methodology and then the plans.

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- 8.6 We expect the FEP to act as a national input to the RESP regional pathways and for iterative feedback processes to be established between the FEP and RESP pathways.
- 8.7 The second point raised by the majority of respondents concerned further clarity on the interaction of NESO's various strategic planning roles. Although we do not consider that FEP Guidance is the appropriate document in which to make statements about other policies, we have amended the Guidance to require NESO to demonstrate in the FEP publication how they have ensured consistency in data and assumptions across both their internal processes, as well as taking into account external modelling, such as that done for offshore spatial modelling by The Crown Estate, and the Crown Estate Scotland, and the distribution future energy scenarios (DFES).

9. Timing of the FEP publications

Section summary

In our consultation we asked if the proposed guidance aligned with our previous decision setting out the requirements for NESO to provide a 'major' FEP publication in a three-yearly cycle, with the flexibility to provide interim 'minor' update publications in the years in between.

Having considered all responses, we have decided to amend the Guidance to clarify triggers for updates, and timing of publications.

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| Q8. Do you agree that section eight of the draft guidance aligns with the decisions we made in December 2023? |
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Decision

- 9.1 We have amended the Guidance to strengthen the requirement for NESO to consult with stakeholders on what criteria might trigger a minor, or major, update to the FEP outside of the three-year cycle.
- 9.2 We have also amended the Guidance to clarify expected publication dates, by removing a reference to a range of dates, in favour of a specific date.

Respondents' views and our rationale for change

- 9.3 We received fifteen responses to Question 8. All considered that the Guidance reflected the decision, but a number of stakeholders raised the same two issues around clarity of triggers for out of cycle updates, and timing of updates.
- 9.4 Four respondents considered that the date range for publishing the FEP of "18 months to two years" did not provide enough certainty in the planning calendar. We had intended to leave some flexibility for NESO as part of the CSNP preparation cycle, but appreciate that fixed dates do provide a more predictable cycle. As such, we have amended the Guidance to specify that major FEP publications must be published by the end of July, two years prior to the main CSNP publication. This aligns with amendments made to the final FEP licence conditions following the March 2024 statutory consultation.
- 9.5 Six respondents expressed a desire for more clarity on the triggers or criteria that would initiate a minor or major update. The Guidance already contains the requirement for NESO to consult with their stakeholders on the criteria for triggering a major update out of cycle. This should become a standing item in NESO's Methodology consultation and publication. Whilst we do not think such a

substantive requirement is necessary for identifying trigger events or information for minor updates, we will require NESO to be transparent about their rationale for doing so.

- 9.6 A few stakeholders raised different queries around the timing cycle in general; whether a three-year cycle was optimal for the CSNP (and so FEP by extension) process, whether FEP publications should be moved closer to CSNP publications, or whether either should align with price controls. We have, however, consulted previously⁵ on this and having agreed with NESO their optimal planning cycle for interaction between these two roles, do not intend to revisit that decision.

⁵ [Decision on the framework for the Future System Operator’s Centralised Strategic Network Plan](#)
