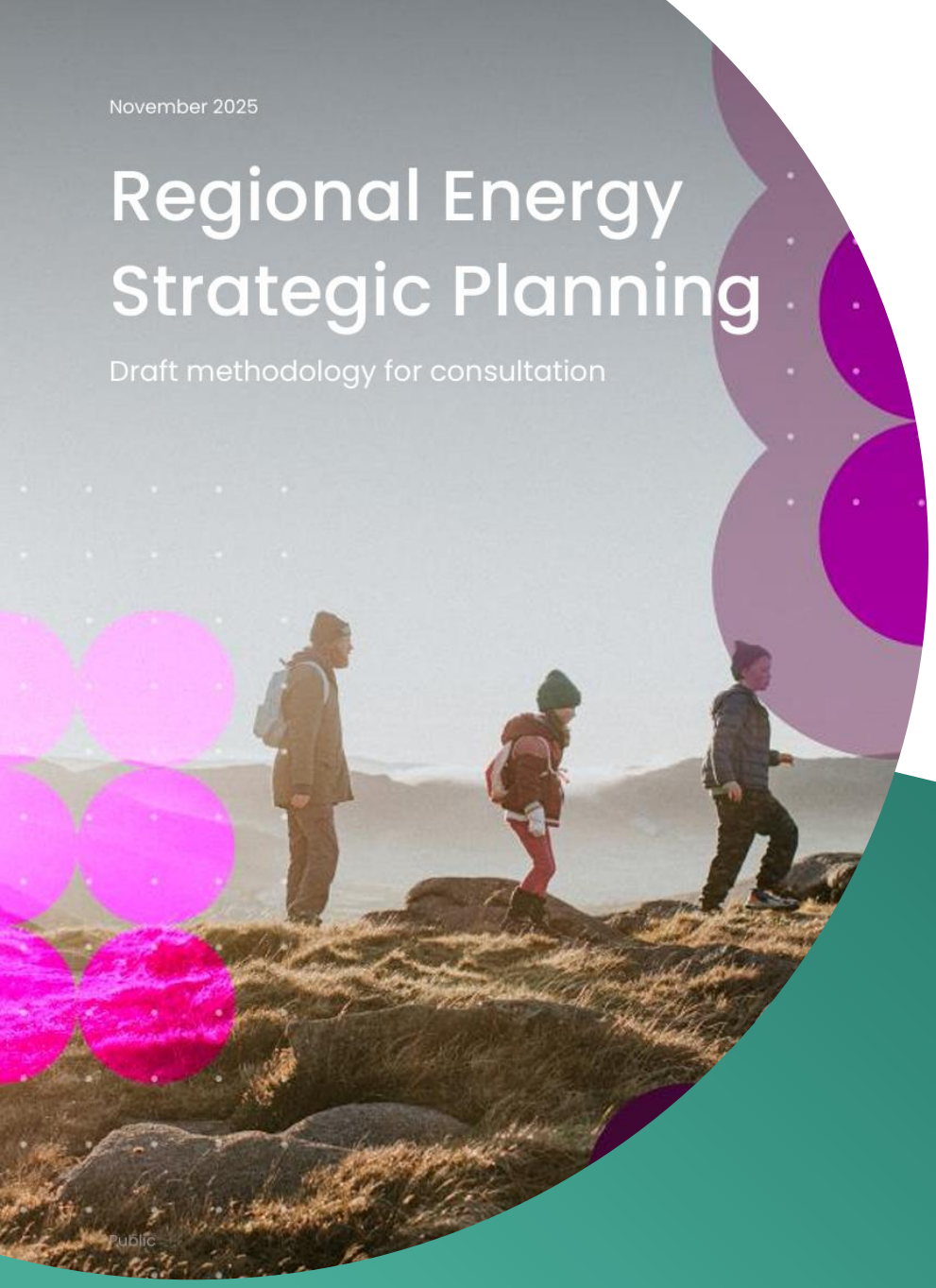
November 2025

Regional Energy Strategic Planning

Draft methodology for consultation



Public

NESO
National Energy System Operator

RESP Draft Methodology Consultation

City Science Response

16th January 2026

City Science®
Delivering decarbonisation

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About us: City Science

City Science is a UK based SME delivering energy, transport and carbon consultancy for UK public sector bodies including DESNZ, the Climate Change Committee (CCC), Innovate UK, and through direct engagement with local authorities. Having worked in this space for over a decade we have been at the forefront of developments that the public sector faces with decarbonisation and helped on their journey from planning to delivery. This includes:

- **LAEPs:** A pioneer in this space, we have delivered numerous energy plans following the Energy Systems Catapult LAEP Guidance, including the national rollout across Wales as funded by the Welsh Government, and multiple authorities across England.
- **LHEES:** Recognising Scotland's energy planning process and its focus on heat and energy efficiency, we have successfully delivered work focussing on zoning and helping Scottish local authorities.
- **Network Operators:** Throughout the LAEP process, we directly engage with DNOs and NESO to ensure alignment with wider planning processes, such as DFES.

We consider the development of RESPs across the country an important milestone towards Clean Power 2030, the UK's legal commitment of net zero by 2050, and the individual targets that the local authorities we support are working towards.

Our response to this consultation focuses on topics and questions relating to our role in delivering the above projects, and our expertise in this sector.

Consultation Response

1. Do you agree that in Scotland and Wales the strategic plans outlined in this methodology should be known as the Scotland RESP and Wales RESP respectively? If not, what alternative should be used?

We believe the naming is clear, consistent with devolved government, and we support this decision.

2. Do you agree with our approach to engagement as we develop the RESPs? Please provide your reasoning.

We are pleased that the important role of consultancies carrying out energy planning work is recognised explicitly within the Energy Industry engagement group and look forward to taking part.

3. Do you agree with the approach we have outlined on local actor support, and how we have phased the delivery? Please provide your reasoning.

We recognise capacity constraints and welcome the phasing of support. However, the method for deciding where support will be offered in early waves must be robust and fair and ensure local actors that would most benefit from support are able to get it.

4. Do you agree that Local authorities should be able to decide whether to send a political representative or officer to the Strategic Board? Please provide your reasoning. Do you agree with our proposed voting structure for Strategic Boards? If you think we should change it, please provide your reasoning. Do you feel any changes should be made to the proposed terms of reference? Please provide us with details.

Yes absolutely – local authorities need to be at the centre of all decision-making within RESP.

We are additionally pleased that local government has the largest voting share with 50% to avoid network interested outweighing local priorities. Additionally, we believe that two-thirds voting share is more applicable than 80% to drive forward decisions within the sector.

5. Do you agree with our proposals for appointing members of the Strategic Boards? If you think we should change it, please provide your reasoning.

Yes, we agree with proposals. We would welcome clarity for local government covering multiple RESP regions, or those that may be affected by future local authority boundary changes in future.

6. Do you agree with our proposed design for working groups? If not, what changes would you propose and why?

We are pleased to see NESO recognise established means of collaboration within regions, which can benefit from existing stakeholder working groups from the many LAEPs across the country. We believe the methodology would benefit from clarity on roles, responsibilities and frequency of engagement required from working group members.

7. Do you agree with the proposed representation for the GB Steering Committee? If not, are there other participants you feel we should consider? Do you agree that we should not be making major changes to the RESP methodology within cycle? If not, please can you give examples of circumstances where you think this may be necessary?

We believe there is an important role for LAEP and LHEES practitioners such as City Science to fall within cross-sector organisations operating at a GB level. Additionally, the inclusion of Welsh and Scottish government, LGA and UK100 allows higher levels of decision making and consensus which we believe will help the overall process.

We also believe that changes are inevitable, especially within the first 3-year cycle. It is encouraging that this is recognised at this early stage, and that mechanisms are built in already.

8. Do you agree with the approach for the Nations and Regions Contexts? Please provide your reasoning. How do you envisage using the Nations and Regions Contexts and what would make the output work best for your needs?

We are pleased to see the recognition of LAEPs and LHEES so early within the section, and that NESO shares City Science's view on the importance they will play within RESPs.

The Nations and Regions Contexts would likely form the start of a current day baseline within a future LAEP or LHEES, and would allow the delivery of these in a more consistent and cost-effective manner.

We would welcome additional clarification around spatial visualisation, to ensure anything published will be compatible with other modelling and GIS systems.

We also believe this part of the methodology should be a live process, and should receive a more frequent update cycle than the 3-year proposal, given the rapid change to the energy system we are currently seeing.

9. Do you agree with the scope of 'Whole Energy' for RESP outputs?

We are pleased to see the RESP methodology recognise a multi-vector approach to energy as with LAEPs. The inclusion of hydrogen and of heat for district heating in particular signify a step forward in regional planning.

We believe though that there is a risk of underrepresentation in groups such as oil, LPG and solid fuel users, and others off the gas grid that may currently be experiencing high levels of fuel poverty.

10. How do you envisage using the RESP Pathways and how can we communicate Pathways to support you to use them effectively? Do you agree with the approach for the RESP Pathways? If not, please provide your reasoning.

The RESP pathways are likely to form initial decarbonisation options for local authorities, and we envisage them forming the beginning state in LAEPs before being tweaked by local actors.

It is essential that the naming and description of the pathways must be relatable for both technical and non-technical stakeholders. Additionally, all assumptions much be made as transparent as possible.

11. Do you agree with our prioritisation approach and criteria set out to evaluate the validity of the Consistent Planning Assumptions values? Please provide your reasoning.

Yes, we agree with the prioritisation approach. We would encourage care to be taken to ensure any additions or removals of categories are tracked throughout the RESP process, to avoid categories cycling between coming in and out of favour, and to assist longer term planning.

12. Do you agree with our approach for the Consistent Planning Assumptions? Please provide your reasoning?

We agree with the approach, and look forward to assisting the RESP process within the industrial subject matter experts group.

13. Our preferred approach is to move the RESP delivery dates back to enable option 2. Do you support this approach and are there any other wider factors we should consider?

We can see the benefit of additional DNO engagement of this option, however without indication of how long this delay would be, we are unable to support this option.

14. Do you agree with our proposed approach for the Spatial Context? Please provide your reasoning. How do you envisage using the Spatial Context and how can we communicate these outputs to support you to use it effectively?

For the digital geospatial tool, we recognise the restrictions required on national critical infrastructure, however we would encourage any non-restricted data must be made available in as easy a manner as possible, including direct data downloads and if possible APIs.

15. Do you agree with our description of the three types of complexity and the examples indicated? What additional considerations should we take to categorise complex strategic energy needs? Please provide your reasoning.

We believe the complexities may benefit from clearer examples, however they work well as they are. There may be benefit flagging complexities of multiple level government for decisions, and additional geographical complexities such as socio-economics, or land use.

16. What further considerations should we take as we develop the approach for specifying and categorising Strategic Investment Needs to ensure consistent regulatory treatment of network investments? Please provide your reasoning.

The methodology seems well placed to deal with a range of uncertainties. We would encourage alignment to LAEP and LHEES focus zones and priority projects, which can provide short term cost and investment opportunities, and additionally overall LAEP costing, which can advise longer term cost effectiveness.

17. What examples of whole system optimisation opportunities are you are aware of and what considerations should we take to identify, prioritise and develop these collaboratively with you?

LAEP practitioners are well practised in optimisation, with costs, network capacity, and multiple energy vectors being a part of many LAEPs. Engagements with these organisations will help greatly.

18. Do you support the selection of Option 2 as delivering best value in assuring alignment? If not, please provide your reasoning.

Provided timelines remain realistic, we believe Option 2 to deliver the best value. We believe elements of Option 3, such as justifying misalignment of peak demand, is something that LAEPs may be best placed to answer, with a more local focus, further reinforcing Option 2.

19. What further considerations should we take as we develop the approach to Network Planning Assurance for gas distribution networks? Please provide your reasoning.

We agree that gas distribution networks require a separate and bespoke process, given the fundamental differences and lack of flexibility/peak load considerations as needed with electricity. Integration with LAEPs and LHEES will be crucial as these contain pathways and focus zones that GDNs can use to refine their planning.

20. Do you agree with our approach to societal considerations? What additional considerations should we make on PSED as we develop the RESPs? Please provide your reasoning.

We are pleased to see the recognition of air quality and fuel poverty, and that societal impacts. The approach would benefit from clarity around whether this is part of the main process or an additional study, as often is the case in LAEPs, and for example around the spatial resolution of this work.

21. Do you agree with our proposed environmental approach? Please provide your reasoning if you think we should be doing this differently.

Again, we are pleased to see the recognition of LAEPs and LHEES, and any benefits such as air quality are already within societal considerations.

22. Do you have any observations or suggestions on our proposed approach to managing RESP data?

We look forward to the publication of data dictionaries, and the utilisation of APIs wherever possible; we appreciate it is not always the case. Open, standardised formats, and clear versioning with changelogs of data will allow us to process changes within LAEPs with greater clarity, and we hope future data will keep to this.

23. How frequently do you believe data refreshes should occur to ensure the RESP remains accurate and useful? What criteria should trigger a data refresh? Please provide your reasoning.

For pathways, we believe a 3 year cycle is appropriate. This ensures that any naming and descriptions can remain current, and allow stakeholder confidence and familiarity to build. However we believe a more regular data refresh will be necessary for the Nations and Regions Context, allowing the current state of a region to remain relevant; for example, comparing the number of EV chargers or PV installations today vs 3 years ago would lead to a very large discrepancy.

24. Will commercial sensitivities discourage you or other stakeholders from contributing to the in-development register? What measures could help build confidence in sharing information?

We will not be discouraged due to the thoroughness, in particular adhering to known Aqua Book principles. The openness to aggregating data to protect anonymity is encouraging, and we would be happy to share similar methods that have been employed on LAEPS. We believe collaboration is necessary for the transition we face, particularly given the whole energy approach of RESP, bringing together stakeholders with varying views.

25. Overall, do you agree with the approaches proposed across the RESP methodology? Are there any elements of the methodology that you would like to see in more detail?

City Science is supportive of the RESP methodology and with our wider expertise in energy planning we will continue to engage with the process. We look forward to continued direct engagement, and will follow future consultations with interest.