National Audit Office

The UK's independent public spending watchdog

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CFD LOAD FACTORS EVIDENCE

Thank you for your request on 17 November 2025 in relation to the DESNZ annual report and accounts, and the load factors used. Your request has been handled under the terms of the Environmental Information Regulations 2004. You asked us to send you the evidence from Afry, and their response, and the "available data" that we have collated.

With regards to the first aspect of your request in terms of the NAO's request for evidence from Afry, I have enclosed a list of the questions we asked related to the load factors and other assumptions in a separate document.

To the third aspect of your request, I should explain that LCCC use data from live generators – those whose CfDs have started generating electricity and receiving payments – to calculate load factors for wind-farms. LCCC publish summarised versions of their data in the LCCC Data Portal and use the external Climate Data Store for wind-speeds: https://cds.climate.copernicus.eu/datasets/reanalysis-era5-single-levels?tab=download. LCCC use their calibrated wind load factors to inform the load factors used for the remainder of the portfolio that is under construction. The NAO audit approach recalculates the wind load factors using LCCC's granular generator level data – to agree to the values calculated by LCCC.

The NAO then benchmarks the calculated load factors against the view of an external industry expert, in this instance, Afry. This includes asking the expert for the load factors they would use in a similar situation, what they deem an acceptable range to be and obtaining their views on LCCC's approach of extrapolating load factors based on historic generation data. We then reach a conclusion on whether the load factors are materially appropriate.

Lastly, after carefully considering the scope of your request, we are refusing to supply you with any of the details from Afry's final report that relate to Load Factors information in accordance with Regulation 12(5)(e). You can find the full details in the Annex. The Regulation states a public authority may refuse to disclose information to the extent that its disclosure would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest. While we appreciate the public interest in transparency and accountability, and of the weight of presumption in favour of disclosure when considering Environmental Information Requests, in our assessment of your request we have to address the adverse impact that disclosure would be likely to have on the future conduct of our audit functions i.e. Afry (and potentially others) may choose not to provide essential information or support to us going forward if they believe we would disclose information that they legitimately regard as commercially sensitive. For this reason, we reasonably conclude that the public interest in the effective performance of our public audit function outweighs the public interest in the disclosure of this information.

The public interest test

We have considered the public interest in favour of public authorities promoting greater public awareness and understanding of Environmental decision making, all of which ultimately contribute to a better environment. We recognise that there is a public interest in the governments work on climate change and other environmental factors, and therefore we have provided you with some of the information you requested. The NAO serves the public interest by putting factual information into the public domain – helping parliament hold government to account, providing transparency on nationally important matters, and driving public service improvements and better use of public funds. Nevertheless, we consider that it is in the public interest, in favour of maintaining the exception. On balance, we consider the public interest rests with the NAO being able to deliver an effective and efficient public audit function and reporting our findings. As Afry are the owners of the information, you may wish to consider directing your enquiries to them.

Our policy is to respond to requests as helpfully and promptly as possible. Therefore, I hope this information is helpful and you are happy with the way we have handled your request. If you are not happy with this response, you can ask for an internal review within 40 working days by writing to the NAO FOI Team at FOI@nao.org.uk. If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The primary way of escalating your concerns to the Information Commissioner is at: https://ico.org.uk/foicomplaints.

Yours sincerely,

NAO FOI Team

Annex

Regulation 12(5)(e) states a public authority may refuse to disclose information to the extent that its disclosure would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest. All EIR exceptions are subject to the public interest test set out in regulation 12(1)(b). A public authority can only withhold information if the public interest in maintaining the exception outweighs the public interest in disclosing the information. Regulation 12(2) specifically states that a public authority shall apply a presumption in favour of disclosure. Regulation 12(9) provides that the exception is not available for information on emissions. What are the general principles of the exception? The purpose of the exception is to protect any legitimate economic interests underlying commercial confidentiality.