

11th June 2025

Dear

ATISN 24720 Future Energy Grid

Information requested

Thank you for your request which I received on 14th May 2025. You asked for:

- 1) Full meeting minutes, transcripts, or detailed notes (beyond published summaries) from meetings of the Independent Advisory Group (IAG) on the Future Electricity Grid for Wales, held between 1st June 2024 and 15th May 2025, and to date.
- 2) Any presentation materials, briefing papers, or reports shared with or produced by the group during this period.

Our response

- 1) I have decided that the information requested relating to full meeting minutes is exempt from disclosure under section 35(1)(a) of the Freedom of Information Act and is therefore withheld. The reasons for applying this exemption are set out in full at Annex 1 to this letter.

No transcripts or other meeting notes are held by Welsh Government, other than the meeting summaries, which are already published on the advisory group webpages. [Independent Advisory Group on Future Electricity Grid for Wales | GOV.WALES](#)

- 2) The materials which have been shared with the group during their work, will be used in the creation of an accessible evidence base about the future needs of Wales, including cost, impact and benefit of different approaches to building grid infrastructure, as detailed in the group's Terms of Reference.

As this evidence and information will be placed in the public domain in due course, it is currently withheld under Section 22 of the Freedom of Information Act 2000: Information Intended for Future Publication. Full reasoning for applying this exemption is appended at Annex 1, at the bottom of this letter. Links to the published materials will be made available through the Advisory Group webpage, once the evidence base has been compiled. [Independent Advisory Group on Future Electricity Grid for Wales | GOV.WALES](#)

Next steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response.

Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit,
Welsh Government,
Cathays Park,
Cardiff,
CF10 3NQ

or Email: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF.

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely

Annex 1

Application of exemptions/exceptions

The Freedom of information Act provide a right for anyone to ask a public authority to make requested information available to the wider public. As the release of requested information is to the world, not just the requester, public authorities need to consider the effects of making the information freely available to everybody. Any personal interest the requester has for accessing the information cannot override those wider considerations.

I have decided to withhold the following information:

- Full meeting minutes (beyond published summaries) from meetings of the Independent Advisory Group (IAG) on the Future Electricity Grid for Wales, held between 1st June 2024 and 15th May 2025, and to date.
- Any presentation materials, briefing papers, or reports shared with or produced by the group during this period.

This Annex sets out the reasons for the engagement of sections 35(1)(a) and 22 of the Freedom of Information Act and our subsequent consideration of the Public Interest Test.

Engagement of Section 35(1)(a) – Formulation of Government Policy

We are not obliged to provide information if it relates to the formulation of government policy.

The minutes contain discussions and decisions related to the formulation of both current and ongoing government policy which should be exempt from disclosure.

The Welsh Government believes that full meeting minutes (beyond published summaries) from meetings of the Independent Advisory Group (IAG) on the Future Electricity Grid for Wales should be exempt from disclosure.

Releasing the information at this stage may prejudice future consultation processes and outcomes and further policy development. Discussions to date have taken place on the understanding that they are held within the group, so that members may speak freely. Group members would be less candid in the discussions they hold and the advice they provide should full minutes be shared. This would likely lead to less rigorous and in-depth exploration of options and advice being provided to Ministers. Resulting in less comprehensive policy with the potential to do unintended harm, leading to reputational damage to Ministers and Welsh Government.

Section 22 – Information Intended for Future Publication

Section 22 states that *Information is exempt information if –*

- a) *The information is held by the public authority with a view to its publication, by the authority or any other person, at some future date (whether determined or not)*
- b) *The information was already held with a view to such publication at the time the request for information was made, and*
- c) *It is reasonable in all the circumstances that the information should be withheld from disclosure until the date referred to in paragraph a).*

Subsections (a) and (b) above are met because the presentation materials, briefing papers, or reports shared with or produced by the group have been gathered and held with a view to publication of the information contained within them. This information will be published in due course in line with normal procedures.

With regards to part (c), I have given consideration as to whether it would be 'reasonable in all the circumstances' that the information should be withheld from disclosure until the proposed publication date. Releasing the information at this time would cause disruption to the Welsh Government's intentions in relation to its publication arrangements. I am therefore content that the exemption is engaged.

Public Interest Test

In order to satisfy the public interest test in relation to the exemption(s), it is necessary to conclude that the public interest arguments in favour of withholding the information are sufficient to *outweigh* the public interest arguments in favour of release.

Public interest arguments in favour of disclosure

- The information relates to how decisions have been made in respect of recommending principles for planning new infrastructure in Wales. Disclosure would enhance public scrutiny of decision making.
- Release of the information could promote public understanding of the process by which decisions are made and would be consistent with the Government's commitment to greater transparency.

Public interest arguments in favour of withholding

- Premature disclosure of information could lead to public scrutiny at a stage where recommendations and policy is still being developed. Releasing this information will not help ensure all arguments are properly considered as it's not an effective way to develop public understanding and interest. In addition, this can hinder the decision-making process by diverting attention and resources away from thorough policy formulation.
- Releasing incomplete or preliminary information may present a distorted picture of the final outcomes, which is counterproductive to the goal of clear

and effective communication. This could result in stakeholders being reluctant to engage in the process.

- Release of the meeting minutes at this stage will compromise the development of the most appropriate policy approach to recommend. Discussion points contain sensitive and contentious issues. Disclosure of information at this stage could potentially affect the impartiality and the bias of group members, which will have adverse effect on the long term impacts from recommendations made.
- The minutes record active policy discussion regarding policy recommendations, their implementation, and the potential unintended consequences and impacts, which are yet to be fully understood. Disclosing this information could hinder free and frank discussions, thereby damaging the quality of advice and leading to poorer decision-making. The content and sensitivity of this information relate to the future processes of ongoing policy development. These processes are very much active, and key decisions on the formation of this policy will most certainly be hindered by the disclosure of this information as it will lead to an unbalanced level of scrutiny of formulating discussion and a disproportionate response which might not reflect the final policy outcomes.
- Presentation materials, briefing papers, or reports shared with or produced by the group come from a range of sources and some will contain conflicting information or opinion. In consideration of the strength of public feeling in relation to potential future grid infrastructure projects, it is important that the information supplied into the public domain through Welsh Government is considered, accurate and presents the balance of opinions in a way that is informative, constructive and helpful in the policy context. This can only be achieved with additional time to work on the presentation of the evidence base, and release of the library of papers at this time would risk public concern and confusion which is directly counter to the objective of gathering the evidence.

Balance of public interest test

Section 35(1)(a) exemption.

Whilst we appreciate the need to allow the public to scrutinise our decision-making processes, greater public interest lies in ensuring high quality policy and decision-making, and in the properly considered development of policies and decisions. We reached the view that, on balance, the public interest is better served by withholding the meeting minutes under Sections 35(1)(a) of the Act at this time.

We feel it is important to note that there is already high-level information about the topics covered in group meetings published on the groups webpages, [Independent Advisory Group on Future Electricity Grid for Wales | GOV.WALES](#),

and we feel that this meets the public interest in understanding the types of matter under consideration in the group meetings.

Additionally, it is important to note that the recommendations to ministers from the consideration of material supplied to the group will also ultimately be published.

We therefore feel that the information in the public interest will be better served by the information which will be released following full scrutiny and finalisation for placing in the public domain, than in the provision of minutes that relate to the policy in development steps to achieve this.

Section 22 exemption

Section 22 is a public interest exemption. This means that, in order to withhold presentation materials, briefing papers, or reports shared with or produced by the group, I must show that the public interest in withholding is greater than the public interest in releasing it.

In terms of the public interest, it is recognised that there is public interest in there being openness and transparency within Government.

The proposed publication date for this information will be agreed as part of normal business and will be published on the Welsh Government webpages in due course.

While the advisory group has committed to compiling a public evidence base which will draw together the information obtained by the group, including cost, impact and benefit of different approaches to building grid infrastructure, as detailed in the group's Terms of Reference, there is a thorough validation process which is undertaken on the information to ensure its accuracy. By restricting access to the information ahead of publication, we will be publishing the information in a co-ordinated manner to all people at the same time, thereby ensuring an editorial process is adhered to which will confirm the accuracy of the information.

An accelerated release of the information, much of which has been supplied by external technical and subject experts whose input is necessary in agreeing final copy of outputs, might result in inaccurate, unchecked information being disclosed prematurely, misleading the public.

To that end, I do not think it is reasonable in all the circumstances or in the public interest to release this information prematurely. Rather, I believe the public interest would be best served if the information were released as scheduled.

I am satisfied therefore that the balance of the public interest falls in favour of withholding the information.