10 November 2026

Dear

Requests for information - ATISN 27533, ATISN 27581 and ATISN 26-0040

We are writing further to our previous correspondence concerning your related requests under the above references, and our offer to meet with you.

We have considered the requests together because they cover closely related and overlapping information concerning Bute Energy and associated organisations, investments, meetings and correspondence. We consider that the information requested is environmental information and have therefore handled your requests under the Environmental Information Regulations 2004 (the EIRs).

Regulation 12(4)(b): manifestly unreasonable

Regulation 12(4)(b) of the EIRs allows a public authority to refuse a request that is manifestly unreasonable.

A substantial volume of potentially relevant information is held on our Electronic Document and Records Management System, known as iShare, as well as within the Outlook email accounts of individual officials.

iShare is the Welsh Government's corporate repository for information created and received by officials in the course of their duties that must be retained for business or historical purposes. Documents are saved using naming conventions appropriate to the effective management of Welsh Government records. The system is designed to support our business and records management requirements and does not necessarily enable information falling within broad or generic requests to be readily identified and extracted.

Your requests cover several organisations and named individuals, different types of information, overlapping periods between 2021 and 2025, and matters relating to investment, shared ownership, renewable energy projects and engagement with Welsh Ministers and officials.

Searches using the organisations, individuals and subject areas specified would return a substantial volume of potentially relevant material. Each record would need to be reviewed individually to establish whether it falls within scope. Any relevant information would then need to be considered for disclosure, including whether it contains information requiring redaction and whether consultation with third parties would be necessary.

An initial sample search of the iShare system returned 100,803 results. We recognise that a significant proportion of these results would ultimately fall outside the scope of your requests. However, each result would need to be reviewed to determine whether it contains information falling within scope. Even allowing only 30 seconds to assess each result, this initial review alone would take approximately 840 hours of officials' time. This estimate does not include the additional time that would be required to retrieve and examine relevant records in detail, consider any applicable exceptions, undertake redactions or third-party consultation, and prepare the response.

Where providing information would require broad and time-consuming searches, we seek to assist requesters in narrowing or refocusing the information sought. This is why you were asked to narrow the scope of your original request and why we subsequently offered a meeting to discuss the three related requests.

Although you narrowed your original request, you subsequently submitted two further related requests. Following our offer of a meeting, you identified areas of overlap but confirmed that the remaining elements of the requests were not withdrawn or narrowed.

Taking the requests together, and having regard to the volume of potentially relevant information and the work required to identify, retrieve and review it, we consider that responding to the requests as currently framed would place a disproportionate burden on the Welsh Government. We have therefore concluded that the requests are manifestly unreasonable under regulation 12(4)(b).

Public-interest test

Regulation 12(4)(b) is subject to the public-interest test. We have also applied the presumption in favour of disclosure required by the EIRs.

We recognise the public interest in openness and transparency regarding the Welsh Government's engagement with renewable energy companies. We also recognise the public interest in information concerning investment in renewable energy projects and the development of renewable energy policy in Wales.

However, responding to the requests as currently framed would require a substantial amount of officials' time to identify, retrieve and examine potentially relevant records. This would divert resources from officials' other responsibilities and impose a disproportionate burden on the Welsh Government.

Having considered the circumstances, we have concluded that the public interest in maintaining the exception outweighs the public interest in disclosure. Your requests are therefore refused under regulation 12(4)(b) of the Environmental Information Regulations 2004.

Advice and assistance

Our previous offer of a meeting was intended to help you identify and refine the particular information of most interest to you. We would like to repeat that offer.

We would be happy to arrange a short Microsoft Teams meeting with officials from the relevant Welsh Government policy area. The meeting would provide an opportunity to discuss the information you are seeking and consider how any revised request could be framed to enable more targeted and proportionate searches.

For example, a revised request could focus on:
• a particular meeting, decision, investment or announcement;
• one organisation or named individual;
• a shorter and more specific period; or
• one category of information, such as ministerial briefings, meeting notes or direct correspondence.

Please let us know if you would like to attend a meeting and we can send some suggested dates and times. Alternatively, you are welcome to provide a revised and more focused request in writing. Any revised request would be treated as a new request.

Your right to request a review

If you are dissatisfied with the Welsh Government's handling of your requests, you may ask for an internal review within 40 working days of the date of this response.
Requests for an internal review should be addressed to:
Information Rights Unit
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Email: Freedomofinformation@gov.wales
Please quote the reference numbers ATISN 27533, ATISN 27581 and ATISN 26-0040.
You also have the right to complain to the Information Commissioner's Office. However, the Commissioner will not normally investigate a complaint until the matter has been through our internal review process.
The Information Commissioner can be contacted at:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Yours sincerely,