

16/06/2026

Dear

ATISN 26986

Information requested

Thank you for your request which we received on 18/05/26. You asked for the following information regarding the award of Ynni Cymru Capital Grant funding to Pulse Plastics Ltd:

1. Any correspondence, notes and memoranda relating to the approval and award implementation process.
2. Details of what has been paid, to whom and when.
3. Information on the checks carried out before funding was paid.
4. Notes of meetings & calls with Pulse Plastics Limited from 14th October 2025 to date.
5. Evidence of procurement costs submitted by Pulse Plastics pursuant to the grant award.
6. Correspondence relating to solar energy systems and their installation at Pulse Plastics Limited, including dates of connection and associated costs.
7. Correspondence relating to battery systems and their installation at Pulse Plastics Limited, including associated costs and dates of connection.
8. All invoices provided in relation to the solar and battery installations at Pulse Plastics Limited together with any narratives as to their component parts.
9. Any ancillary works undertaken or committed to in connection with the solar installation at Pulse Plastics Limited, including (but not limited to) roof repairs.
10. Details of the installation and energisation dates of the solar panels at Pulse Plastics Limited.
11. Details of the installation and energisation dates of the battery systems at Pulse Plastics Limited.
12. Correspondence concerned with any request for additional grant funding.
13. Whether any grant funding was approved for use outside the scope of the documented grant guidelines.

14. Whether any grant funding was approved for expenditure on works undertaken prior to 8th September 2025.
15. Details of any payments made to companies connected with Scott Liddle excluding Pulse Plastics Limited.

Our response

1. The correspondence with Pulse Plastic Ltd related to their award is attached as a separate document. Welsh Government does not hold any notes or memoranda related to the award. The correspondence is related to clarifying the application and to the subsequent award.
2. Pulse Plastics Limited (Company Registration Number: 04529261) was awarded £961,064.57 of Ynni Cymru capital funding through the 2025/2026 scheme. The following payments have been made to Pulse Plastics Limited, along with the corresponding payment dates:
 - 12/01/26 – £345,916.34
 - 30/01/26 – £61,186.57
 - 10/03/26 – £239,336.67
 - 01/04/26 – £183,375.00
 - 17/04/26 – £131,249.99
3. Before funding is paid, we ask for the information listed below to be provided.
 - Grant Award Pathway
 - Grant Recipient / Scheme Number
 - Grant award / Claim amount / Remaining balance
 - Claim Number
 - Signed by authorised signatory
 - Amount within claim period
 - Invoice(s) match claim amount
 - Claim inclusive of VAT
 - Details of match funding
 - Grant award variation details (if applicable)
 - Funding Pre-Conditions, including List Pre-Funding Conditions, Document Reference, and Check
 - Confirmation that all Grant Offer Letter pre-conditions have been met
 - Project Lead sign-off
 - Peer review checks
 - Final QA sign-off
 - Documents required by Welsh Government, including claim form, claim checklist, progress reports and invoices

Schedule 4 of the Grant Offer Letter also requires certain documentation to be provided in support of claims, which is subject to verification. This includes:

- A progress report with photographs of on-site equipment/materials and visible SLES components installed directly related to the claim

- Invoices

In addition to the above, for the first claim the applicant is required to provide evidence to satisfy all requirements of Condition 5(a) as stated on the grant offer letter. For the final claim, there is an additional requirement to provide a certificate of completion from the installation contractor.

The Claims Steps document is attached to this response.

4. The Welsh Government has not directly held any meetings or calls with Pulse Plastics Limited during the period from 14 October 2025 to date. Engagement relating to the Ynni Cymru scheme has been undertaken and managed on behalf of the Welsh Government by its delivery partners, Local Partnerships LLP.

Two site visits to Pulse Plastics Limited took place on 16 October 2025 and 4 February 2026 to see the progress of the works. These visits were not formally minuted.

5. Welsh Government holds detailed procurement information submitted in support of the grant claim, including supplier quotes, tender information and associated procurement evaluation material. This information includes detailed supplier pricing and commercially sensitive bid information.

We have withheld commercially sensitive documentation regarding the details of the procurement process undertaken by Pulse Plastics. Please see the annex 1 at the end of this letter for further details.

Welsh Government can confirm that Pulse Plastics Limited has provided evidence relating to procurement costs, as required under the Grant Offer Letter, including:

- Providing evidence of quotes and tenders received.
- Providing evidence of the scoring criteria and decision-making process.

Welsh Government can confirm that Pulse Plastics Limited demonstrated a reduction in capital equipment costs from £849,038 to £829,814.57, representing a saving of £19,223.43 achieved through its procurement process.

6. The request asks about any correspondence on solar energy systems relating to the Ynni Cymru funded installation at Pulse Plastics Limited. Welsh Government does not hold any relevant information. Welsh Government does not request and hence hold records of all correspondences between the awarded projects and other companies supplying the funded project.
7. The request asks about any records of correspondence on battery systems with Pulse Plastics Limited. Welsh Government does not hold any relevant information. Welsh Government does not request and hence hold records of

all correspondences between the awarded projects and other companies supplying the funded project.

8. Please see listed below a table detailing all invoices received, the value, date on invoice and invoicing company.

| | Invoicing Company | Summary of components | Invoice Number | Net Value (£) | Invoice Date |
|-----------------------|------------------------------------|--|----------------|---|--------------|
| Claim 1 (12/01/26) | Hebe Rassau 20 Ltd ¹ | <ul style="list-style-type: none"> Solar installation Roof strengthening Power Factor Correction System Project management – 50% | INV-0039 | 461,221.78 69,700 relating to roof strengthening | 04/11/2025 |
| Claim 2 (30/01/26) | Inspire Green Ltd | <ul style="list-style-type: none"> Enabling works. | INV-0739 | 30,000 | 24/11/2025 |
| | Inspire Green Ltd | <ul style="list-style-type: none"> Final inspection and testing | INV-0753 | 18,000 | 09/01/2025 |
| | Scenic Air Con & Refrigeration Ltd | <ul style="list-style-type: none"> Supply and installation of low carbon heating system | PP16062025 | 11,650 | 14/11/2025 |
| | Technia Environment & Planning Ltd | <ul style="list-style-type: none"> Site design Technical consultancy Project management | TEPL02025 | 21,932.09 | 13/01/2026 |
| Claim 3 (10/03/26) | Inspire Green Ltd | <ul style="list-style-type: none"> Project management | INV-0745 | 34,500 | 03/11/2025 |
| | Inspire Green Ltd | <ul style="list-style-type: none"> BESS | INV-0769 | 445,000 (part payment) | 10/02/2026 |
| Claim 4 (01/04/26) | Inspire Green Ltd | <ul style="list-style-type: none"> BESS | INV-0769 | 445,000 (part payment) | 10/02/2026 |
| | Inspire Green Ltd | <ul style="list-style-type: none"> EV chargers | INV-0778 | 12,000 | 09/03/26 |

¹ Pulse Plastics provided 25% match funding, exceeding the 10% minimum required for SMEs. This contribution was provided by Hebe Rassau 20 Ltd under a formal loan agreement. The arrangement is consistent with guidance that third-party funding may be used. The match funding has been applied to cover the roof strengthening and PFC works, ensuring that the grant being claimed relates solely to the solar PV system.

At the time the works commenced, the Grant Offer Letter was still being finalised, so Hebe Rassau 20 Ltd funded the initial solar PV and Power Factor Correction works under the terms of the loan agreement between the two organisations. INV-0039 represents repayment of this loan.

| | | | | | |
|--------------------|-------------------|--|----------|-----------|----------|
| | Inspire Green Ltd | <ul style="list-style-type: none"> Energy management system | INV-0785 | 5,000 | 10/03/26 |
| | Inspire Green Ltd | <ul style="list-style-type: none"> Overall system architecture | INV-0786 | 13,672.91 | 10/03/26 |
| | Inspire Green Ltd | <ul style="list-style-type: none"> Completion of enabling works | INV-0787 | 40,000 | 10/03/26 |
| | Inspire Green Ltd | <ul style="list-style-type: none"> Commissioning - System Operational | INV-0788 | 13,442.65 | 10/03/26 |
| Claim 5 (17/04/26) | Inspire Green Ltd | <ul style="list-style-type: none"> Project extension: <ul style="list-style-type: none"> Installation of BESS units Installation of EV charger | INV-0790 | 175,000 | 16/03/26 |

Welsh Government holds detailed invoices submitted in support of the grant claim. This information includes supplier pricing, technology specific information, and other commercially sensitive information.

We have decided not to disclose the invoices themselves. Please see annex 1 at the end of this letter for further details.

9. Invoices submitted by Pulse Plastics Limited as part of the first claim include costs associated with ancillary works undertaken in connection with the solar installation at the site. These works include:

- Additional roof strengthening works in line with structural engineering requirements.
- Associated labour and scaffolding.
- Roofing works, including a trapezoidal roofing system.

The costs of ancillary works in the first claim received are highlighted in yellow in the table above detailing invoices.

10. Total Installed Capacity 602.55 kWp

The Connection Agreement between Pulse Plastics Limited and National Grid Electricity Distribution (South Wales) plc is dated 12 September 2025 and has been provided as part of the claims process. This confirms that the installation is connected to, or approved for connection to, the electricity distribution network as of this date.

In accordance with Clause 8 of the Connection Offer, which states that a Connection Agreement must be entered into prior to energisation and governs the terms under which the installation may be connected to the distribution

system, the date of 12 September 2025 has been treated as the assumed energisation date.

11. The BESS installation Electrical Installation Certificate is dated 13 March 2026 and a further certificate for the project expansion dated 27 March. Overall commissioning was the 27 March.
12. The Welsh Government confirmed an additional funding award of £131,250 in March 2026 through a Variation to the Grant Offer Letter, bringing the total grant award to £961,064.57. Correspondence confirming this variation is included for information.
13. No grant funding awarded through the Ynni Cymru capital grant scheme to Pulse Plastics Ltd has been approved for use outside the scope of the Ynni Cymru Capital Grant Funding Programme 2025 to 2026 guidelines.
14. Pulse Plastics Limited was formally notified on 11 September 2025 that its application to the Ynni Cymru Capital Grant Funding Programme 2025–2026 had been successful.

The scheme requires SMEs to provide a minimum level of match funding of 10%, which Pulse Plastics Limited exceeded by providing 25%. This private funding or match funded element is not within the control of the Welsh Government, and any decisions taken by applicants during the assessment process, including whether to commence works prior to the grant offer letter being signed, are taken at their own discretion and risk. At the time of application, Pulse Plastics Limited was aware that match funding of £276,604.86 would be required if the application was successful. Welsh Government therefore recognises that applicants may have chosen to commence works using their match funding contribution in advance to meet the programme deadline of 31 March 2026.

At the point the first claim was authorised, it was recognised that Pulse Plastics Limited had undertaken works prior to 8 September 2025 using its own match funding and at its own risk. The project was fully funded by Pulse Plastics Ltd up until the first claim in December. This was documented in correspondence with the Welsh Government and recorded in the scheme decision log.

15. Pulse Plastics Limited (Company Registration Number: 04529261) was awarded £961,064.57 of Ynni Cymru capital funding through the 2025/2026 scheme. All payments relating to this grant award have been made to Pulse Plastics Limited.

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 Environmental Information Regulations (EIR) 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.

We recognise that the EIR Regulations contain a presumption in favour of disclosure, however we have decided to withhold the following information:

- Procurement documents relating to Pulse Plastics SLES project.
- Invoices relating to Pulse Plastics SLES project.

This annex sets out the reasons for the engagement of regulation 12(5)(e) Environmental Information Regulations and our subsequent consideration of the Public Interest Test.

The Welsh Government believes that commercially sensitive procurement information should be exempt from disclosure for the following reasons:

- disclosure would adversely affect the confidentiality of commercial or industrial information, where that confidentiality is provided by law to protect a legitimate economic interest. For example:
 - supplier pricing;
 - negotiated rates;
 - component-level costs;
 - tender scoring/evaluation material;
 - procurement strategy;
 - commercial assumptions or margins.
- Disclosure could damage Welsh Government's ability to provide best value during future procurement processes. The project highlighted was able to demonstrate cost saving from a closed procurement exercise.
- Disclosure could adversely affect future Welsh Government grant schemes, as it would set a precedent for us to disclose commercially sensitive information in the future.

Public Interest Test

In order to satisfy the public interest test in relation to the exemption, 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

We recognise that there is a strong public interest in disclosure of information relating to the use of public funds. In this case, disclosure would support scrutiny of

public expenditure by allowing the public to understand how Ynni Cymru capital grant funding was awarded and paid. It would also assist consideration of whether the project represented value for money, whether grant conditions were met before payments were made, and whether the Welsh Government administered the scheme appropriately. There is also a wider public interest in transparency around renewable energy grant funding, particularly where public money is used to support energy system installations and decarbonisation projects in Wales.

Public interest arguments in favour of withholding

However, the information being withheld consists of detailed procurement documents and full invoices, including supplier pricing, negotiated rates, component-level costs, tender and evaluation material, procurement strategy, commercial assumptions and other commercially sensitive information. Disclosure of this level of detail would be likely to adversely affect the legitimate economic interests of the suppliers involved and the grant recipient by revealing information that could be used by competitors or could weaken their position in future procurement and commercial negotiations, reducing their best cost outcomes for Welsh Government in future schemes for example. It could also undermine confidence among applicants, grant recipients and suppliers that detailed commercially sensitive information provided to Welsh Government for grant assurance purposes will be protected appropriately.

Balance of public interest test

On balance, we consider that the public interest in maintaining the exception outweighs the public interest in disclosure of the detailed procurement documents and full invoices. We have taken account of the public interest in scrutiny of public expenditure, value for money, assurance that grant conditions were met, transparency around renewable energy grant funding, and public confidence in the administration of the Ynni Cymru scheme.

We consider that these interests have been met by the information disclosed in this response, including the total grant awarded, payment amounts and dates, invoice-level summaries, supplier names, component descriptions, confirmation of the checks undertaken before payment, and confirmation that the procurement evidence was reviewed. Disclosure of the underlying detailed procurement and invoice documents would go beyond what is necessary to meet those transparency interests and would reveal commercially sensitive information that could adversely affect the legitimate economic interests of the suppliers and the grant recipient.

For those reasons, we consider that the public interest favours withholding the detailed procurement documents and full invoices while providing summary information to support transparency and accountability.