

National Grid
1 – 3 Strand
London
WC2N 5EH

By email to:

grid.code@nationalgrideso.com

Robert.Wilson2@nationalgrideso.com

GC0143: Last resort disconnection of Embedded Generation

5 May 2020

Dear Robert,

SUEZ Recycling & Recovery UK Ltd operates landfill gas generation and EfW generation facilities and strongly opposes the proposal for Last Resort Disconnection of Embedded Generation without exemptions in place.

Landfill gas generators must not be included within the disconnection as these facilities are absolutely intrinsic to the 24/7 control and management of landfill gas through the use of gas engines, gas flares and associated ancillary plant. The requirement and ability to import power from the National Grid to operate the gas flares when engines are unable to operate for any particular reason is essential. Any disconnection of imported electricity would immediately stop gas flares from operating and ultimately would result in the migration and release of highly flammable and odorous landfill gas into the environment and local communities. Many landfill sites are close to residential areas and all sites are operated under strict Environmental Permits issued by the Environment Agency and therefore it is clear that this proposal could have very serious consequences.

Disconnecting EfW plants will require sites to rely on emergency systems in order to safely control the high-pressure steam systems. In addition to potential safety issues, the disconnection will result in serious disruption to infrastructure to manage residual waste streams.

There is currently no mechanism for embedded generators, that are not participants of the UK balancing market, to be compensated for emergency actions. In the event that our Energy from waste and landfill generation schemes are curtailed by the DNO we would be impacted by loss of revenue and imbalance charges via our off taker and this is before we consider the wider contractual implications.

In combination with these emergency measures the ESO should be looking to press ahead with the 'Optional Downward Flexibility Service', with a clearer view on possible Strike Prices to be made available with immediate effect for Embedded generators that may voluntarily take part in this service.

Yours sincerely

A handwritten signature in black ink, appearing to read "Gary Mayson".

Gary Mayson
COO, Operations

