



**FAO Rob Wilson  
NGESO**

By Email: [robert.wilson2@nationalgrideso.com](mailto:robert.wilson2@nationalgrideso.com)

5<sup>th</sup> May 2020

Dear Rob

**Last Resort disconnection of Embedded Generation**

Viridor operates an embedded generation portfolio across the UK of 320MW capacity from energy from waste. Our facilities provide a critical service to ensure the sanitary treatment of waste.

Viridor is concerned about the potential impacts of the proposals set out in GC143 – and would ask you to consider the following points before implementation this week:

1. Consider shortening the initial period of implementation of GC143 to 31 May 2020 covering the two near term bank holiday periods where NGESO clearly has some concerns around foot room. This would allow time for turndown schemes (such as ODFM) to be more fully developed for a 1 June 2020 start date.
2. NGESO will hold several commercial options to exploit to avoid stress across the UK electricity system. We suggest this proposed option is also implemented as, or alongside, a commercial one. Failure to do so, would bring NGESO under challenge unless it can fully evidence that it has taken all other measures prior to requesting the disconnection of embedded generators. NGESO could set out proposals to compensate different types of embedded generators to reduce the risk of emergency situations in advance. We would gladly feed into this process, if you sought further engagement on the matter.
3. We would welcome further guidance on how the DNO's will be reacting to the GC143 proposal and ask that this is communicated effectively across the sector. This might include highlighting those GSPs or areas which may be more sensitive to an over-supply in order prepare (especially in light of COVID-19 constraints at operational stations).

Yours sincerely

*Mark Knights*

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