

**CENTRAL ELECTRICITY REGULATORY COMMISSION  
NEW DELHI**

**Petition No. 121/MP/2013**

Subject : Petition under section 79 (1) (c) of the electricity Act, 2003, Regulations 12 and 13 of the CERC (Unscheduled Interchange Charges and related matters) Regulations, 2009, Part 7 of the CERC (Indian Electricity Grid Code) Regulations, 2010 and Regulations 111-113 of CERC (Conduct of Business) Regulations, 1999.

Date of hearing : 4.7.2013

Coram : Shri V.S.Verma, Member  
Shri M. Deena Dayalan, Member

Petitioner : Karnataka Power Transmission Corporation Ltd and SLDC,  
Karnataka

Respondents : National Load Despatch Centre, New Delhi  
Southern Regional Load Despatch Centre, Bangalore

Parties present : Ms Swapna Seshadri, Advocate for the petitioners  
Shri V.Suresh, SRLDC  
Ms. Joyti Prasad, NRLDC

**Record of Proceedings**

Learned counsel for the petitioner submitted as under:

(a) Southern Regional Load Despatch Centre (SRLDC) has been implementing the Regulation 7 of the Central Electricity Regulatory Commission (Unscheduled Interchange Charges and related matters) Regulations, 2009 (UI Regulations) to place the limit of 12% deviation from drawal on the net schedule for the State.

(b) Regulation 7 of the UI Regulations provides for 12% of its scheduled drawal. However, SRLDC as the implementing agency has applied it as 12% of the net drawal schedule by the State.

(c) Consequently, the net schedule implemented by the SRLDC for calculation of the 12% margin leads to a situation on number of

occasions when the net schedule is zero or negative and therefore, the application of 12% margin does not arise.

(d) The issue of 12% margin was brought to the notice of SRLDC in the 78th meeting of the OCC held on 11.12.2012 in which SRLDC clarified that in accordance with the existing regulations, 12% violation messages were being generated based on the net schedule of the State and issued to the constituents. The SRLDC also stated that in case, any State was aggrieved on the matter of the existing methodology adopted, they could approach the appropriate forum for remedy.

(e) The purchase of 750 MW through MTOA by the State of Karnataka will end effective from 15.6.2013. Therefore, while the generators will continue to export power outside and the quantum of export will be higher than the import of power, the drawal schedule may become negative effective from 16.6.2013.

(f) Though the State has entitlement to draw power of 1800 MW from the Central Generating stations, the drawal schedule given to the State will be zero or negative. Consequently, the deviation up to 12% of the drawal schedule will become meaningless and there will not be even 1% flexibility in operating the real time grid.

(g) Learned counsel requested to clarify/modify/relax Regulations 7 of the UI Regulations and hold the calculation of the drawal schedule as per the present practice for all the constituents.

2. The representative of the SRLDC submitted as under:

(a) The objective of UI Regulation is to bring grid discipline through appropriate commercial principle. However, the commercial aspect becomes secondary and the grid Security becomes the primary aspect in real time grid operation.

(b) SRLDC has been ensuring grid security by strict implementation of Grid Code. SRLDC has issued all the messages only with consideration of grid security and network condition.

(c) The computation of UI limit by SRLDC based on net schedule is as per the prevailing UI Regulations. In case of a situation where export transaction quantum from the State is more than that of its ISGS entitlement and import transactions, then the 12% consideration on the absolute value of net drawal schedule or 150MW whichever is less, will be considered as permissible UI quantum at Normal Grid condition.

(d) UI volume shall not be considered as a legitimate quantity irrespective of grid condition. The past experiences also clearly indicates that UI mechanism needs to be phased out and CERC also has initiated action in this regard. System frequency is not the only parameter that determines the grid security level. The values prescribed in UI Regulations are with the consideration of Grid at Normal condition. However, the present condition is much different. The Southern Regional grid almost remains in alert condition for most of the time due to the following reasons.

(i) There were no adequate RGMO/FGMO response in Southern Region. A special meeting was held on 29.6.2013 in this regard with detailed analysis of RGMO performance for the instances of May / June 2013.

(ii) The performance of AUFR and  $df/dt$  in Southern Region is far below the required level. Though all the constituents declare that the quantum is made available, due to over lapping of groups, not connected with adequate feeders considering average load of the feeder, non-operative etc., the actual relief seen were less than declared quantum.

(iii) There were atleast 24 instances of grid disturbance of type GD-I in Southern Region during the period 13th January to 13th June, 2013. Out of which three disturbances were pertaining to Sharavati station alone. All the three events were attributable either to failure to operate or very much delayed operation of protection system at Sharavati. Had SRLDC failed from its responsibility of giving utmost importance for grid security and allowed limitless the OD / UD by the constituents, then many of these Grid Disturbance would have been of severe category.

(e) The representative of the SRLDC requested to issue direction to petitioner for ensuring performance of RGMO/FGMO, AUFR,  $df/dt$ , MVAR management and Load Management.

3. After hearing the learned counsel for the petitioner and representative of the SRLDC, the Commission directed the petitioner to file status on implementation of defense mechanism in the State of Karnataka on affidavit, on or before 26.7.2013.

4. SRLDC was directed to file its reply to the petition by 19.7.2013 with an advance copy to the petitioner, who may file its rejoinder, if any, by 31.7.2013.

5. The Commission reserved order on the maintainability of the petition.

By order of the Commission,

SD/-  
(T. Rout)  
Joint Chief (Law)