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सं/No	SRPC/SE II/2016/ 8295	दिनांक / Date	30.12.2016

Secretary
 CERC
 NEW DELHI.

Sub: Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) **(Fifth Amendment)** Regulations, 2016

Madam,

Kind reference is invited to draft amendment issued by Hon'ble Commission vide Public Notice No. L-1/18/2010-CERC dated 9th December, 2016.

The comments of SRPC Secretariat in this regard are enclosed for kind consideration, please.

Thanking you.

Encl: as above

Yours faithfully,



(एस.आर. भट्ट/S.R. BHAT)
 सदस्य सचिव / Member Secretary

Comments of SRPC Secretariat on 5th Amendment of IEGC

Regulation No.	Existing/suggested Regulation	Modification suggested	Reasons
5.2(f)(ii)(a)	There should not be any reduction in generation in case of improvement in grid frequency below 50.05 Hz (for example, if grid frequency changes from 49.9 to 49.95 Hz, or from 50.00 to 50.04 Hz there shall not be any reduction in generation). For any fall in grid frequency, generation from the unit should increase as per generator droop upto a maximum of 5% of the generation subject to ceiling limit of 105% of the MCR of the unit having regard to machine capability.	The regulation could be replaced as : There should not be any reduction in generation in case of improvement in grid frequency below 50.05 Hz (for example, if grid frequency changes from 49.90 to 49.95 Hz, there shall not be any reduction in generation). For any fall in grid frequency, generation from the unit should increase as per generator droop limited to 5% of the generation level before frequency fall, with ceiling limit of 105% of the MCR of the unit subject to machine capability	As mentioned in Explanatory Memorandum it is required, to bring more clarity with respect to extent of primary response required from ISGS by way of governor action.
Regulations 5.2 (f), (g), (h) & (i)		FGMO can be considered in place of RGMO	With improved frequency profile and large scale RE Integration, FGMO can be considered in place of RGMO
Following para may be added at the end of clause 5.2 (h)	For the purpose of ensuring sustainable primary response, RLDCs/SLDCs shall not schedule the generating units beyond exbus generation corresponding to 100 % of the Installed capacity. Further, Valve Wide Open (VWO) operation of units is not allowed so that there is margin available in valve opening for providing primary response upto 5% of the generation level. In case of gas/Liquid fuel based units also, adequate margins while scheduling should be kept by RLDCs/SLDCs in due consideration of prevailing ambient conditions of temperature and pressure	For the purpose of ensuring sustainable primary response, RLDCs/SLDCs shall schedule the applicable generating units upto 95% of DC (keeping 5 % margin for primary response). Generators would faithfully state DC(inclusive of RGMO response and also with due consideration of prevailing ambient conditions of temperature and pressure viz. a viz. site ambient conditions on which installed capacity of these units have been specified.) Further, Valve Wide Open (VWO) operation of units is not allowed so that there is margin available in valve opening for	There have been number of deliberations on DC: ➤ Generators state that DC is their prerogative. It is upto the RLDC to restrict the schedules to ensure RGMO response. ➤ Beneficiary state that generators should declare DC which can be scheduled (RGMO component need not be declared) With this approach it would be binding on the generators

	<p>viz. a viz. site ambient conditions on which installed capacity of these units have been specified. Provided that the VVO margin shall not be used by RLDC to schedule in Ancillary Services</p>	<p>providing primary response upto 5% of the generation level. Provided that the VVO margin shall not be used by RLDC to schedule in Ancillary Services (including reserves). RLDC shall inform the Commission once in 6 months about the Governor Response (whose scheduling is being undertaken by RLDC) for all the instances which meet the criteria of providing governor response.</p>	<p>to declare DC inclusive of RGMO response. RLDC would have a clear methodology of scheduling only upto 95% of DC. As an alternative Hon'ble Commission can decide that DC would be exclusive of RGMO response as suggested by beneficiaries and in that case RLDC would schedule upto DC. In both the cases instances of Governor Response needs to be monitored and appropriately dealt with in case of inadequate response.</p>
<p>Following para shall be added at the end of clause 6.5.19</p>	<p>Provided that if a generator is not able to restore the unit by the estimated time of restoration, RLDC shall revise the schedule only one more time on the basis of new estimated time of restoration and the revision schedule shall become effective from the 4th time block, counting the time block in which the revision is advised by the generator to be the first one</p>	<p>Provided that if a generator is not able to restore the unit by the estimated time of restoration, RLDC shall revise the schedule considering the unit out. The revised schedule keeping in view the ramp rates shall become effective from the 4th time block, counting the time block in which the revision is advised by the generator to be the first one after the unit is synchronized. Generator would keep the buyer/beneficiary and RLDC informed every three hours of the likely revival in the intermediate period.</p>	<p>This may ensure better LGB and avoid gaming, if any. Periodical information by Generator would help in LGB/Purchase planning be the buyer/beneficiary.</p>