

## Suggestions/ Comments on Indian Electricity Grid Code 5<sup>th</sup> Amendment

Cl.No	Description	Sterlite Comment
2. (1)	a) Regulation 2. (1) (sss) 'Definition' of <b>Spinning Reserves</b>  "The Capacity which can be activated on the direction of the system operator and which is provided by devices including generating stations/units, which are synchronized to the grid and able to effect the change in active power."	"The Capacity which can be activated on the direction of the system operator and which is provided by devices including generating stations/units & <b>BESS (Battery Energy Storage System) located at both the transmission line or at the generating stations</b> , which are synchronized to the grid and able to effect the change in active power."

The same may also be reflected in the CERC Ancillary Services Operation Regulation, 2015.

### ***Rationale:***

1. As this amendment is focused on inclusion of spinning reserves along with the ancillary services for frequency regulation. Hence spinning reserves should also be included and reflected along with the other eligible participants (i.e. Un-requisitioned Surplus of Inter State Generating Stations) in CERC ASOR, 2015.
2. BESS (Battery Energy Storage System) has analogy with both Generation & Transmission as per Electricity Act, 2003. BESS can be a part of transmission line whose capacity is monitored and operated by System Operator.
3. As in this amendment both the Open Cycle Gas Turbines & Combined Cycle Gas Stations are included along with coal/lignite based thermal generation. Knowing the fact that Plant Load Factor of all the eligible Gas based Inter State Generating Stations under Ancillary Services Operations is less than 30 %, hence the co-location of BESS in those Gas based plants should also be taken into consideration.