



Monnet Ispat & Energy Limited

Village & P.O. : Naharpali, Tehsil : Kharsia, Raigarh - 496661 (Chhattisgarh)

Phone : 07762-275502 / 03 / 04, Fax : 07762-275505 / 077762-391510

E-mail : mielrgh@monnetgroup.com, Website : www.monnetgroup.com, CIN No. : L02710CT1990PLC009826

The Secretary,
Central Electricity Regulatory Commission
3 rd & 4 th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001
Ph: 91-11-23353503 Fax: 91-11-23753923
E-mail : info@cercind.gov.in

Date: 31.07.18

Sub- Comments on the Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) (Fourth Amendment) Regulations, 2018.

Ref.: CERC Public Notice - L-1/132/2013-CERC dated 29 June, 2018

Dear Sir,

We are a 230 MW captive power plant inclusive of 60 MW from waste heat recovery boilers, based in CG Raipur and Raigarh. We have steel plant of 1.5 MTPA capacity at Raigarh and 0.3 MTPA at Raipur.

Sometimes we avail short term open access to wheel power from Raigarh CPP to our Raipur located captive load. Hon'ble commission may appreciate that there are more chances and reasons for deviations (actual injection to month ahead scheduled injection) in case of CPP as compared to IPP.

Therefore our suggestions are in reference to proposal to amendment into regulation 7:

The Draft DSM and related matters, Fourth Amendment speaks as follows.

Amendment of Regulation 7 (Limits on Deviation volume and consequences of crossing limits) of the Principal Regulation:

4.4 After the existing provision to clause (1) of Regulation 7 of the Principal Regulations, a new provision shall be added as under: "Provided also that the total deviation from schedule in energy terms during a day shall not be in excess of 3% of the total schedule for the drawee entities and 1% for the generators and additional charge of 20% of the daily base DSM payable / receivable shall be applicable in case of said violation."

Our suggestions:

Presently short term open access customers in Chhattisgarh are not allowed for revision of month ahead approved schedule (approved by SLDC) on day ahead basis for more than 2 times

Corporate Office : MONNET HOUSE, 11 Masjid Moth, Greater Kailash Part II, New Delhi-110 048 (INDIA)
Ph. : 011-2921 8542/43/44/45/46, Fax : 011-2921 8541, E-mail : monnet@monnetgroup.com

Regd. Office : Monnet Marg, Mandir Hasaud, Raipur-492 101 (Chhattisgarh)
Ph. : 0771-2471 334 to 339, Fax : 0771-2471 250, E-mail : monnetraipur@monnetgroup.com



in a month even in case of emergency; so with continuation of the same provision related to revision in schedule, it is extremely difficult to adhere with the provisions of proposed amendment related to limits of deviation.

It is submitted that since no buyer-seller kind of commercial transactions between two distinct parties is involved in the case of Open Access permission for wheeling of power from a CPP to its captive load through Grid circuit, the practice of updating the scheduling daily is in the best interest of grid stability. For a CPP as a State-Grid-user for wheeling to declare their schedule / plant capability faithfully is possible only when the practice of notifying daily schedules on the previous day is followed. For wheeling also the User takes Open Access Permission and Schedules Power depending upon his surplus generation at injecting end and consumption requirement at the drawl end which always remain dynamic requiring daily declaration of schedule to minimize deviations. The power injected by CGP at one end is meant for self-consumption at the other end and is not meant for any sale to any party, and as such no lead time is required by state distribution company or SLDC for factoring in the wheeled Power in the overall Power Balance.

Therefore we suggest that Short term open access customers should also be allowed -

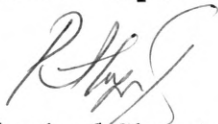
1. To submit day ahead schedule like MTOA and LTA
2. To revise the schedule from 4th time block like MTOA and LTA

We understand that scheduling is not in the scope of this regulation but when limits of deviations is proposed to be squeezed then we request Hon'ble Commission to ensure consequential amendments should be done in respective provisions of related regulations like Grid code etc.

Thanking you.

Yours faithfully,

For **Monnet Ispat & Energy Limited**



(Authorized Signatory)

CC: The Secretary, CSERC, New Shanti Nagar Raipur – we request with Hon'ble Commission to do same amendment to allow revision in schedule for STOA customers in state regulations such as State Grid code and CSERC (DSM) regulations.