



TRANSMISSION CORPORATION OF TELANGANA LIMITED
VIDYUT SOUDHA::HYDERABAD - 82
Website:tstransco.in CIN No.U40102TG2014SGC094248

From
Chief Engineer/SLDC,
TSTRansco, Room No.613,
Vidyut Soudha, Khairatabad,
Hyderabad- 500082.

To
Secretary, CERC.
3 rd & 4 th Floor, Chanderlok Building
36, Janpath, New Delhi- 110001.

Lr.No.CESLDC/SESLDC/DEPP1/ADE-2/F.CERC/D.No.276/18, Dt:31.07.2018

Sir,

Sub: TSTRansco - SLDC – Draft DSM 4th amendment regulations- Submission of comments - reg.

Ref: Public Notice No.L-1/132/2013-CERC, Dt: 29.06.2018.

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With reference to the above, I am directed to submit the following views on the proposed draft regulations, for your kind consideration.

a) Clause 4.4

The following are the views of TSTRansco:

“As per DSM regulations, deviation limit up to 250MW is permitted for RE rich states where the combined installed capacity of Solar & Wind projects is more than 3000MW.

In view of variable nature of Renewable Energy there is a possibility of deviation from schedule. Considering sign change for every 7th block, the maximum deviation possible for at least 80time blocks, which may result in energy deviation of more than 5% on a day basis.

Hence the proposed regulation limiting deviation in energy terms in excess of 3% of the total schedule of drawee entity may lead to spending precious Hydel resources and frequent ramp up/ramp down of conventional sources. Also which may lead to payment of penalties by the Discoms.

Hence the above clause may be examined, after development of quick contingency power markets (Gate Closure time of 4 Time Blocks), Automatic Generation Control and Demand response schemes in state level.”

P.T.O.

b) Clause 4.19

The following are the views of TSTransco:

i. With the high injection of RE power, entities are facing lot of challenges in balancing deviation which is leading to severe financial constraints.

ii. As per present regulation any trading in the power exchange is being implemented with a gate closure time of 3 clear hours.

iii. In such event, for maintaining load generation balance, existing reserves like hydel, intra state generation are being utilised.


iv. for achieving a sign change every 7th block as per the proposed regulation the entity will be required to utilise the limited reserves available viz. Hydel generation etc.

v. This will severely stretch the available limited resources and the discom will be unable to utilise any reserves in the event of contingency. This will severely effect the financial health of the entities.

vi. Hence this clause may be examined after implementation of intra state ABT and after putting in place quick contingency power markets (Gate Closure time of 4 Time Blocks), Automatic Generation Control and Demand response schemes in state level. ”

It is requested to kindly consider the above views and suitably amend the proposed clauses in the DSM 4th amendment regulations.

Yours faithfully,


Chief Engineer/SLDC

Copy to:

Superintending Engineer/Tech. to Chairman & Managing Director/ TSTransco.

P.S.to Joint Managing Director (Finance, Comml., & HRD)/TSTransco.

DE/Technical to Director (Projects & Grid Operation)/TSTransco.

Member Secretary/SRPC/29, Race Course Cross Road/Bengaluru-560009 } for favour of
General Manager/SRLDC/ 29, Race Course Cross Road/Bengaluru-560009 } information