



TATA POWER-DDL

TPDDL/PMG/CERC/310718

Date: 31.07.2018

Mr. Sanoj Kumar Jha,
Secretary,
Central Electricity Regulatory Commission
3rd & 4th Floor, Chandralok Building,
36, Janpath,
New Delhi -110 001

Subject: Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) (Fourth Amendment) Regulations, 2018

Reference: CERC notification no. L-1/132/2013-CERC dated 29.06.2018

Dear Sir,

We write in reference to the notification issued by CERC dated 29.06.2018 seeking comments on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) (Fourth Amendment) Regulations, 2018.

In line with the same please find attached a copy of Tata Power-DDL's comments/suggestions on the subject matter.

Thanking You.

Yours Sincerely,
For **Tata Power Delhi Distribution Ltd.**

P Devanand
HOD (PSC & COS)

TATA POWER DELHI DISTRIBUTION LIMITED

(A Tata Power and Delhi Government Joint Venture)

Corporate Office : NDPL House Hudson Lines Kingsway Camp Delhi - 110 009

Website : www.tatapower-ddl.com CIN No. : U40109DL2001PLC111526

Annexure-A

Tata Power-DDL comments on Draft fourth amendment to CERC DSM Regulations

Tata Power-DDL would like to submit that although the steps taken by Hon'ble Commission is a welcome step in addressing the safety and reliability of grid, following issues that restricts the Discoms ability to plant its scheduling & despatches also needs consideration.

1. No role for third party like Transmission Utility and concerned Load Despatch Centers:

Under the said Regulations, Hon'ble Commission has assigned the responsibility of maintaining the grid discipline on the Buyers and Sellers only. It may however be noted that there are certain factors which are not under the control of the sellers/buyers but can be better controlled by Transmission Utility and concerned Load Despatch Centers. These mainly include tripping of transmission system and scheduling of power within four time block, which has considerable impact on execution of scheduling and despatch plan set up by sellers/buyers.

2. Tripping of transmission lines:

The said amendment has proposed very strict limits for deviation. One of the reasons due to which the DISCOMs under draw is when a section of the load is disconnected due to tripping of transmission lines or power transformers maintained by CTU or STU due to faults. Further, the problem is compounded by the fact that Delhi DISCOMs procure bulk of the power from generating stations situated outside Delhi, except for some distributed solar (less than 2 MW), and are thus completely dependent on the STU and CTU for delivery of power. Any subsequent corrective action to revise our schedule to the altered demand will take at least 4 time blocks. It has been observed that nearly 70% of the tripping events are restored within 4 time blocks which provides insufficient time to take corrective measures.

The Commission may appreciate that, unless intimated beforehand, the Discoms/Buyers cannot account for these events in Schedule planning. By their inherent nature, a tripping or fault cannot be predicted. Also as the fault has occurred in a system not maintained by the DISCOM/Buyer, the DISCOM/Buyer cannot take any action to reduce them by predictive or preventive maintenance.

Tata Power-DDL Submission:

Therefore, the DISCOM should not be held liable for any under-drawal on account of any unforeseen failure of a CTU or STU equipment, which resulted in such under-drawal and may be excluded from liability in case of such events.

3. Force Majeure:

The weather forecasting is limited to predicting the general weather conditions that shall prevail for a period however, rain or storm warnings issued by the Indian Meteorological Department does not indicate the time of the event with a level of accuracy. The lack of said accuracy restricts the Discom/Buyer to take advance corrective actions. This Hon'ble Commission has been pleased to define the same vide its Tariff regulations for 2014 as follows:

"Force Majeure" for the purpose of these regulations means the event or circumstance or combination of events or circumstances including those stated below which partly or fully prevents the generating company or transmission licensee to complete the project within the time specified in the Investment Approval, and only if such events or circumstances are not within the control the



generating company or transmission licensee and could not have been avoided, had the generating company or transmission licensee taken reasonable care or complied with prudent utility practices: a) Act of God including lightning, drought, fire and explosion, earthquake, volcanic eruption, landslide, flood, cyclone, typhoon, tornado, geological surprises, or exceptionally adverse weather conditions which are in excess of the statistical measures for the last hundred years; or (b) Any act of war, invasion, armed conflict or act of foreign enemy, blockade, embargo, revolution, riot, insurrection, terrorist or military action; or (c) Industry wide strikes and labour disturbances having a nationwide impact in India;”

Tata Power-DDL Submission:

A suitable definition in line with the above may also be considered for the purposes of these regulations. The Discom/Buyer should not be liable for under-drawal in case of any Force Majeure Events or trippings of network pertaining to State Transmission Utility and Central Transmission Utility.

4. **Scheduling/revision of power in four time block:** IEGC 2010 and subsequent amendments stipulates that the scheduling/revision of power should be executed in four time blocks. This timeline is adhered to in case when revision is within region however, the process takes approx. 6 time blocks in cases when seller and buyer are located in different region. Further, the scheduling of URS takes more than stipulated 4 time blocks as consent of multiple parties is involved in the same.

It may be noted that Four time blocks are given for actual implementation of schedule from the time of initiation as per IEGC. Generators would revise the declared capacity four time block before actual implementation in web based scheduling portal. The same need to be accepted and approved by NRLDC once NRLDC accepts the same. It comes to Delhi SLDC, Delhi SLDC will accept the same and upload final drawl schedule on their web-site for discoms. Vice versa in case Discom revised their requirement.

Our major concern is that while going through acceptance procedure of NRLDC and respective SLDC. Message reaches to Discom before onetime block of actual implementation. Then Discom proceeds to ramp-up other generation which again take four time blocks. In all this process, Discom suffers penalty for 8 time blocks which is irreversible. Tata Power-DDL suggest that concerned RLDC or SLDC to take control during this 8 time block and schedule power under ancillary/RRAS or scheduling other generator as per merit Order Dispatch. Once the revision information received by concerned beneficiary, he can revise the requirement after 4 time block. These discrepancies between regulation and execution restricts the immaculate planning and execution required to meet such a stringent norm.

Tata Power-DDL Submission:

Tata Power-DDL requests Hon'ble Commission that in light of the aforementioned submission the DSM liability should be passed on to the party who is in a better condition to control the parameters. The Transmission Utility and concerned Load Despatch Centers should also be active party to the said Regulations and the Utility/Discom should not be made to bear the penalties on account of events not attributable to it.

5. **Reliance on power supply from other states:** It may be noted that Delhi procure bulk (approx. 80%) of its power from other states/ regions. Such a power scenario restricts the planning required to meet the stringent norms specified in the Regulations. The exigency which results in huge dip in demand may not be present in other states or regions and hence, the backing down of power is limited to technical limitations of the plant which is usually Minimum Technical Limit.

Tata Power-DDL Submission:

Tata Power-DDL requests Hon'ble Commission to also look into such factors as source of availability of power as state like Delhi has no option but to rely on power from other states.

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