

Ramesh Chandra
Engineer (Comml.)



U.P. Rajya Vidyut Utpadan Nigam Ltd.
7th floor, Shakti Bhawan Extn
Lucknow-226001
Tel-0522-2288056
Fax-0522-2287544
(CIN: U40101UP1980SGC005065)

No. 432 /CE (Coml.) /UNL

Dated. July, 31 2018

Secretary,

Central Electricity Regulatory Commission.
3rd & 4th floor, Chanderlok Building,
36, Janpath, New Delhi-10001

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

Kindly refer to CERC public notice no. L-1/132/2013-CERC dated 29 June, 2018 on the above subject it is to inform you that our suggestions/comments regarding clauses (4.4 & 4.19) are given below-

1. Two clauses (4.4 & 4.19) might seem irrational if the schedule of generating stations (either due to thermal backing or due to Zero Declared Capacity) is Zero. It is explained below:

For clause 4.4- If schedule of a generating station during a day is zero, 1% of schedule is also zero, hence, total deviation (which will have a finite value due to import from station for running auxiliaries) will be in excess of 1% of schedule and will, thereby violate the clause.

For clause 4.19- Similarly, if schedule of generating station is zero, sustained deviation is bound to happen due to continuous import from grid for running auxiliaries and hence, will violate the clause.

Suggestion: A possible remedy may be in a form such that “ the above two clauses may be exempted for all the blocks when schedule is zero.”

2. In clause 4.19 in current draft it is said that to make sign of their deviation from schedule change at least once after every six time block.

It is requested that above clause may be relaxed.

Reason: – Sign of deviation change at least one in every 6 time block forcing generator to change machine load even if machine is running on load as given in Schedule.

So in case of violation of clause 4.19 additional surcharge of 20% on the daily base DSM should be relaxed for generator.

3. In new draft clause(4.4) it is mention that total deviation from schedule in energy terms during a day shall not be in excess of 1% for the generators.

It is requested that above clause should be relaxe for generator in total deviation from schedule in energy terms during a day up to (3%).

Reason: - In case of thermal backing or at the time of tripping of machine or due to certain constraint in thermal operation it is very difficult to match machine load with given schedule exactly up to 24Hrs.



(Ramesh Chandra)
Chief Engineer (Comml.)