

उत्तर प्रदेश राज्य भार प्रेषण केन्द्र

ऊपर ट्रांसमिशन कारपोरेशन लि०  
(उत्तर प्रदेश सरकार का उपक्रम)  
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4282

No.: Dir(SLDC)/SE(RAU)/CERC

Date: 27 July, 2018

**Secretary,**

Central Electricity Regulatory Commission,  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building,  
36- Janpath, New Delhi- 110001

**Sub: Draft Amendment of CERC ( Deviation Settlement Mechanism and related matters) Regulation- 2018.**

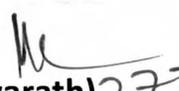
Sir,

Kindly refer letter no. L-1/132/2013 dated 29-06-18, Public Notice on Draft CERC (Deviation Settlement Mechanism and related matters) Regulation- 2018, (Principle regulation) regarding comments of stake holders on the draft amendment. In view of this the enclosed comments are submitted regarding clause no. 3.1(iv), 3.6, 4.19 & 4.4 of the draft amendment, for your kind consideration.

Thanking you.

Your's Sincerely

Encl : As above (2 no. pages)

  
(Ram Swarath) 27.7.18  
Director (SLDC)

**Comments/Suggestions on Fourth Amendment of CERC (Deviation Settlement Mechanism and related matters) Regulations, 2018**

| Sl. No. | Clause Reference | Particular                              | Clause   | Clarification Required  |
|---------|------------------|---|--|---|
| 1.      | 3.1 (iv)         | Area Clearing Price for DSM calculation | The Day-ahead market price of the Power Exchange having a market share of 80% or more in energy terms on a daily basis shall be taken into consideration for linking to the DSM price vector. If there is no single Power Exchange having a market share 80% or more, the weighted average day-ahead price shall be used for linking to the DSM price.   | <ul style="list-style-type: none"> <li>i. How will SLDCs get authenticated market share data?</li> <li>ii. Which Nodal agency at National level will compile data of different exchanges and publish on a single portal for all SLDCs to use the same for DSM calculation of intra-state entities?</li> <li>iii. While calculating market share, whether market clearing volume to be considered for that specific region or all India market clearing volume shall be considered.</li> <li>iv. What approach &amp; methodology shall be used for arriving at Area Clearing Price (ACP), if there is no trade on the exchange for a given day?</li> </ul> |
| 2.      | 3.6              | Energy Charge                           | In clause (3) of Regulation 5 of the Principal Regulations, the words "shall be the value coinciding with the energy charges on imported coal on Deviation Price Vector" shall be substituted by the words "shall be equal to its energy charges as billed for the previous month"   | <ul style="list-style-type: none"> <li>i. Generally, the energy charges for a given month, as finalized and certified by Seller and Buyer, are communicated to SLDC in 2nd/3rd week of next month. However, DSM bills are used just after the 1st week is over (e.g. 8th). What approach shall be followed in case of this delay in getting Energy Charges at SLDC end?</li> </ul>  |
| 3       | 4.19             | Sign reversal after every 6 time block  | Clause (10) of Regulation 7 of the Principal Regulation shall be substituted as under:-<br>"In the event of sustained deviation from schedule in one direction (Positive or negative) by any regional entity, such regional entity (buyer or seller) shall have to make sign of their deviation from schedule changed, at least once, after every 6 time blocks. To illustrate, if a regional entity has positive deviation from schedule from 07.30 hrs to 09.00 hrs, sign of its deviation from schedule shall be changed in the 7th time block i.e. 09.00 hrs to 09.15 hrs from | <p>"In the event of sustained deviation from schedule in one direction (Positive or negative) by any regional entity, such regional entity (buyer or seller) shall have to make sign of their deviation from schedule changed, at least once, <b>after every 9 time blocks...."</b></p> <p><b>Justification:-</b><br/>Whenever Schedule of any generator is revised, it comes in effect from the 4th time block and further it's full effect comes about 2 or 3 more time blocks after this. So for any Schedule change full effect</p>   |

| Sl. No. | Clause Reference | Particular         | Clause  | Clarification Required  |
|---------|------------------|--------------------|---|---|
|         |                  |                    | <p><i>positive to negative or negative to positive as the case may be. Provided that violation of the requirement under this clause shall attract an additional surcharge of 20% on the daily base DSM payable/receivable as the case may be."</i></p>  | <p>comes after around 6 time blocks. It should be appreciated that quantum of load of Uttar Pradesh is very high and if any overdrawl or underdrawl condition comes up due to tripping of generators or transmission lines or adverse weather condition, actions are initiated immediately, but as explained above, it takes several blocks to control and bring it back to normal and reverse the direction of deviation. In case of adverse weather condition or thunderstorm or any such natural weather condition, it becomes even more difficult and more time taking to control and reverse the direction of deviation.</p> <p>Hence it is proposed that the 6 time blocks limit given to reverse the direction of deviation in above mentioned clause may kindly be raised to 9 time blocks.</p> |
| 4       | 4.4              | Additional Charges | <p><i>"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."</i></p> | <p>i. Clear suggestion should be provided to the concerned SERC's for implementation of above provision in state specific DSM regulation for generating DSM bills of intra state entities (generating station and Drawee entities). So that similar treatment of the Intra-State and Inter-State Generator and Drawee Entity can be ensured.</p> <p>ii. How the DSM charges shall be calculated of Intra-state drawee entity in case of zero schedule?</p>  |

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