



"After the existing proviso to clause (1) of Regulation 7 of the Principal Regulations, a new proviso 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."

of IMD. ❖Any failure in weather forecast causes significant dislocation of the load generation balance planning of such distribution utility & ther causes deviations. ❖ Such deviation sometime becomes beyond the control of distribut system operator as the prevailing IEGC allows 4th time block for upward or downward revision of generation availability with ramping ❖ Moreover, As per present practice, clear 3+ hours gap between bidding hour block & scheduling hour block is required to transact any power in real time contingency market.

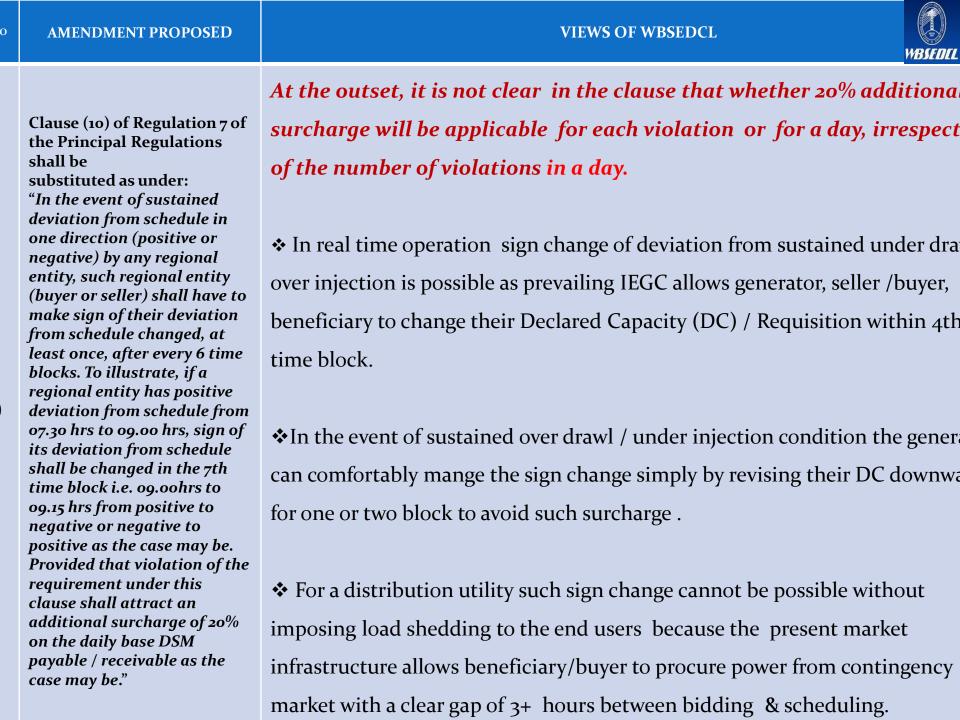
VIEWS OF WBSEDCL

❖ Distribution utilities are the main drawee entity in the grid. The Under drawl / over drawl of any distribution utility depends on the

demand forecast, which is primarily influenced by the weather fore



- *Distribution utility /buyer either has to allow deviation specially the over drawl deviation for this three hours or resort load shedding which is against the Governm of India mandate of 24X7 uninterrupted power supply.
- ❖ Hence, for the purpose of uninterrupted power supply to the end users, there is every possibility to deviate by distribution utility very frequently, more than 3% in total energy, despite maintaining their drawl within the allowable stipulated volum limit in most of the time blocks in a day.
- ❖In the light of the above fact it is proposed that the penal additional surcharge related to deviation in day total volume in energy terms, as proposed in the draft Regulation, should be imposed in steps of % of deviation from day total schedule energy & the corresponding additional surcharge range should be from 5% to 20 of the daily base DSM payable/receivable in steps .
- ❖ Example: For deviation in excess of 3% & up to 4% the said surcharge will be 5% up to 5% deviation the surcharge will be 10% & so on.



VIEW OF WBSEDCL



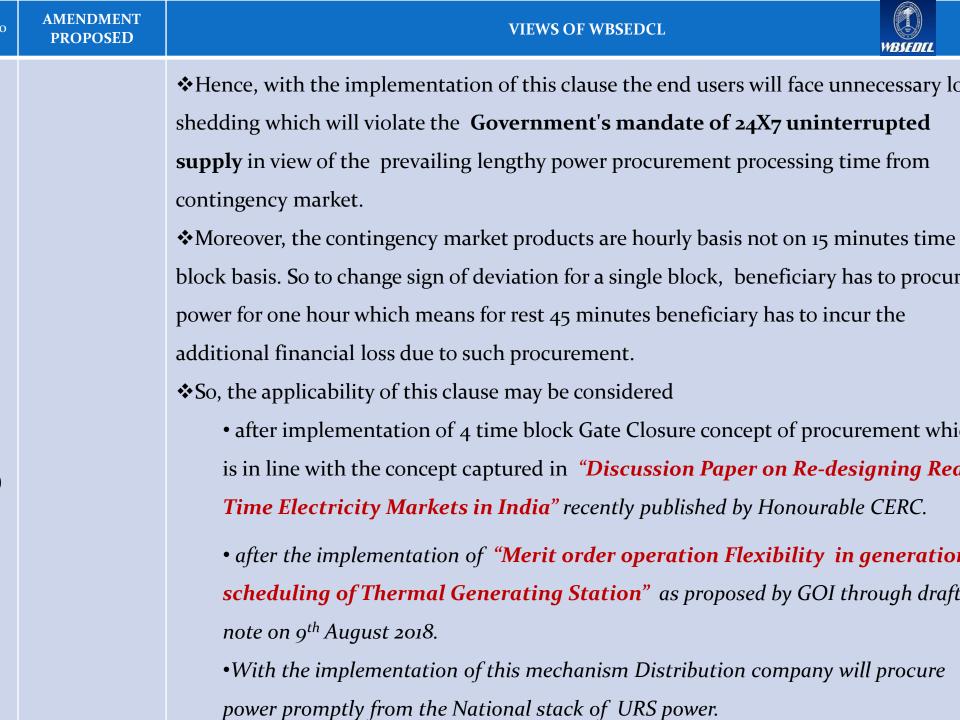
❖In the first block (oo.oo to o1.oohours) beneficiary /buyer can place bid for the procurement of power for 5th hour block (o₄.oo to o5.oohrs) onward. Moreover, the contingency market remains closed from 23.ooHrs to oo.3o Hrs for diurnal operation.

❖As per IEGC, any loss of availability due to unit outage of a generator with whom beneficiary has Long term, medium term & short term agreement gets downward

scheduling effect within 4th time block.

❖In such event, beneficiary cannot procure power from contingency market within 4th time block.

❖ The another option for the beneficiary is then to seek URS power from the Generating station with whom it has LTOA & MTOA. As availability of URS power & its duration in the schedule is totally uncertain in real time operation as per the existing regulatory framework, this source cannot be considered as reliable source.



Overall comments of WBSEDCL

The following Major changes are proposed by the Honourable Commission in the Amendment

- •Linking of DSM vector with Market Price & Cap rate of DSM for the generators as per their last billed energy rate.
- •Tightening of operating frequency band. •Additional surcharge on daily net deviation energy volume limit above 3% w.r.t daily net scheduled
- energy.
- •Additional surcharge for non compliance of sign reversal of deviation with six blocks interval.
- ➤ All the changes/additions as proposed are theoretically essential as per as Grid security & stability is concerned. But from stake holders side, implementation of all the above changes & additions at a time
- may be painful to comply in real time operation.
- As a consequence, the end consumers of the country may be affected commercially & operationally
- all of a sudden.
- ➤ Moreover, some change in regulatory framework & market design are required to comply the above changes honestly. Hence, as a stake holder, it is the proposal to the Honourable CERC to implement the above changes & additions in phase wise manner, so that stake holders can strategise their power purchase/sale portfolio accordingly based on phase wise operational experience, otherwise

there will be the every possible shower of deviation from the Community consists out for



