

Comments on Draft CERC (Deviation Settlement Mechanism and related matters) (Fifth Amendment) Regulations, 2019

1. Clause No: 4 (4.5) (a):

“Up to 31.03.2020, if the sustained deviation from schedule continues for 12 time blocks, the regional entity (buyer or seller), shall correct its position by making the sign of its deviation from schedule changed or by remaining in the range of +/- 10 MW with reference to its schedule, at least once, latest by 13th time block.

Provided that each violation of the requirement under this clause shall attract an additional charge of 10% on the time block DSM payable / receivable as the case may be.

JITPL Comments: The Range of deviation as specified in the regulation i.e. (+/- 10 MW) with reference to the schedule is very less.

As in case of any tripping of mill or any other unforeseen situation which are beyond the control of Generators, Actual generation would be less as compared to the schedule. So in that case, Generators has to bear huge financial loss on account of under injection. Also, in case of revision in schedule, RLDC implemented the revision, after 4th time block from which revision is intimated.

JITPL Suggestion (a): It is requested to set the minimum range should be +/- 50 MW (For first 12 time blocks).

JITPL Suggestion (b): Each violation under this clause shall attract an additional charge of 10% on the Time Block DSM payable/receivable, which is very high. It should be 5% on the Time Block DSM payable/receivable. (For first 12 time block)

2. Clause No: 4 (4.5) (b):

“From 01.04.2020, if the sustained deviation from schedule continues for 6 time blocks, the regional entity (buyer or seller), shall correct its position, by making the sign of its deviation from schedule changed or by remaining in the range of +/- 10 MW with reference to its schedule, at least once, latest by 7th time block.”

Provided that violation of the requirement under this clause shall attract an additional charge as specified in below:

No. of violations in a Day Additional Charge Payable:

(From first to fifth violation) For each violation, an additional charge @ 3% of daily base DSM payable /receivable

(From sixth to tenth violation) For each violation, an additional charge @ 5% of daily base DSM payable / receivable

(From eleventh violation onwards) For each violation, an additional charge @ 10% of daily base DSM payable / receivable

JITPL Comments: In various cases such as: a) Real time curtailment, b) Technical Problem in plant, c) Plant is running on technical minimum, d) Schedule is below technical minimum. In all cases, generator has to continuously over inject to run at technical minimum. In all such cases deviation from schedule will be very high. In that case it is not possible to reverse the sign of deviation within 6 time blocks. And maintaining the range of actual generation +/- 10% as compared to the schedule is also very difficult.

JITPL Suggestion:

(1): Change in reversal of sign of deviation should be increase from 6th time block to 12th time block.

(2): Each violation under this clause shall attract an additional charge, which is very high. It should be flat 3% on the Daily Base DSM payable/receivable.