

PUNJAB STATE TRANSMISSION CORPORATION LIMITED

(Regd. Office: PSEB Head Office, The Mall, Patiala-147001, Punjab, India)

Corporate Identity Number: U40109PB2010SGC033814, Web Site: www.pstcl.org

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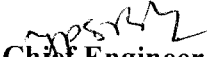
Memo.No: 1437 /SO/OA

Dated: 06-05-19

Sub: Comments/ Suggestions on the Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) (Fifth Amendment) Regulations, 2019.

Ref: CERC Public Notice No. L-1/132/2013-CERC dated 18.04.19

Please find enclosed herewith comments/ suggestions of Punjab SLDC on subject cited draft regulations for kind consideration of the Hon'ble Commission.


Chief Engineer/ SLDC,
PSTCL, Ablowal (Patiala)

Comments/ Suggestions on the Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) (Fifth Amendment) Regulations, 2019:-

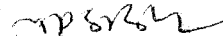
After scrutinizing the draft amendment regulations, Punjab SLDC wishes to submit following comments/ suggestions:-

1. In clause (4) of regulation 7, the words "*at the rates equivalent to charges of deviation corresponding to the grid frequency of 'below 50.01 Hz but not below 50.0 Hz, or cap rate for deviation of 303.04 Paise/KWH whichever is lower'*" may be substituted as under:-
" at the rates equivalent to charges of deviation corresponding to the grid frequency of 'below 50.01 Hz but not below 50.0 Hz. Provided further that in case of generating plants, irrespective of the fuel type and whether the tariff is regulated by the Commission or not, the above charges are applicable at the rates equivalent to charges of deviation corresponding to the grid frequency of 'below 50.01 Hz but not below 50.0 Hz, or cap rate for deviation of 303.04 Paise/KWH whichever is lower'".
2. In clauses (3) (i), (6) & (9) of Regulation 7 of principal regulations, the words "*by the generating plants regulated by CERC using Coal or lignite or gas supplied under Administrative Price Mechanism (APM) as the fuel'*" may be substituted with "*by the generating plants, irrespective of the fuel type and whether the tariff is regulated by the Commission or not'*".
3. In clause (10) of Regulation 7, following changes/additions may be considered for working out sustained deviation violations/ charges:-
 - a. **Sign change may be linked to grid frequency, in order to continuation of overdrawl of power (when frequency > 50 Hz) and under drawal of power (when frequency < 50 Hz) to avoid disturbance in the system.**
 - b. **Dead band may be changed from ± 10 MW to ± 50 MW to 100 MW or 5 to 10% of the schedule variation in that time block, whichever is less, in order to account for those entities, whose schedule is less than 50 MW.**
Provided that in case of retrospective revisions of schedule by Nodal RLDC, if the quantum of variation in revised schedule in a time block is more than the dead band limit in that time block, the limit of dead band shall be equal to the quantum of variation of schedule due to such retrospective revision.
 - c. **Further, no. of time blocks w.r.t working out sustained Deviation from 01.04.2020 may be considered as 12 time blocks instead of 6 time blocks, as proposed for the period upto 31.03.2020, in order to avoid large no. of sustained deviation violations especially on account of persistent SCADA-SEM differences.**

- d. Sustained Deviation charges from 01.04.2020 may be worked out on the average Base DSM payable/receivable for a week (accounting period) instead of daily base DSM payable or receivable, keeping in view of the variation of deviation in schedule on daily basis, as entity cannot be penalized heavily due to high deviation only for that day. The definition for average base DSM may also be incorporated accordingly.
- e. Further, exemption w.r.t sustained deviation may only be provided to must run plants (e.g. run of river and wind & solar) generators. All other RE Generators should not be exempted from sustained Deviations.

It is further submitted that Independent Power Producers (IPPs) situated in the State of Punjab had submitted following objections/comments in respect of sustained deviations worked out as per 4th amendment in DSM regulations.:-

- Sustained deviation w.r.t not change of sign of the deviation in 7th time block due to RGMO intervention in that block should not be considered as violation as the same would be difficult to avoid during operation.
- Additionally, the sustained deviation violation occurring while complying with the revisions in despatch schedules should not be considered for penalty till the load gets stabilized. Similarly the sustained deviation violation occurring due to change in generation for complying with the provisions of Grid Code


Chief Engineer/ SLDC,
PSTCL, Ablowal (Patiala)