



**TATA POWER-DDL**

Tata Power DDL/PMG/CERC/30082019

Dated 30<sup>th</sup> August' 2019

Mr. Sanoj Kumar Jha (Secretary)  
Central Electricity Regulatory Commission  
3rd & 4th Floor, Chanderlok Building,  
36, Janpath, New Delhi- 110001,

**Subject: Proposed framework for Real-Time Market for Electricity.**

**Reference: CERC notification no No. RA-14026(11)/2/2018/CERC dated 6<sup>th</sup> August' 2019.**

Dear Sir,

This has reference to the CERC notification no RA-14026(11)/2/2018/CERC dated 6th August' 2019 on the above captioned matter, wherein all the stakeholders were advised to provide their comments latest by 5<sup>th</sup> September' 2019.

We are thankful to the Hon'ble Commission to provide this opportunity to us and In line with the same, Please find attached a copy of Tata Power-DDL comments on the subject matter as an annexure to this letter.

We will be happy to respond in case any further clarification is required on the same.

Thanking you,

Yours sincerely,

For Tata Power Delhi Distribution Limited,

Sumit Sachdev  
HoD (Power Management Group)

**TATA POWER DELHI DISTRIBUTION LIMITED**

(A Tata Power and Delhi Government Joint Venture)

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Website : [www.tatapower-ddl.com](http://www.tatapower-ddl.com) CIN No. : U40109DL2001PLC111526

Tata Power-DDL comments on proposed framework For Real-Time Market for Electricity

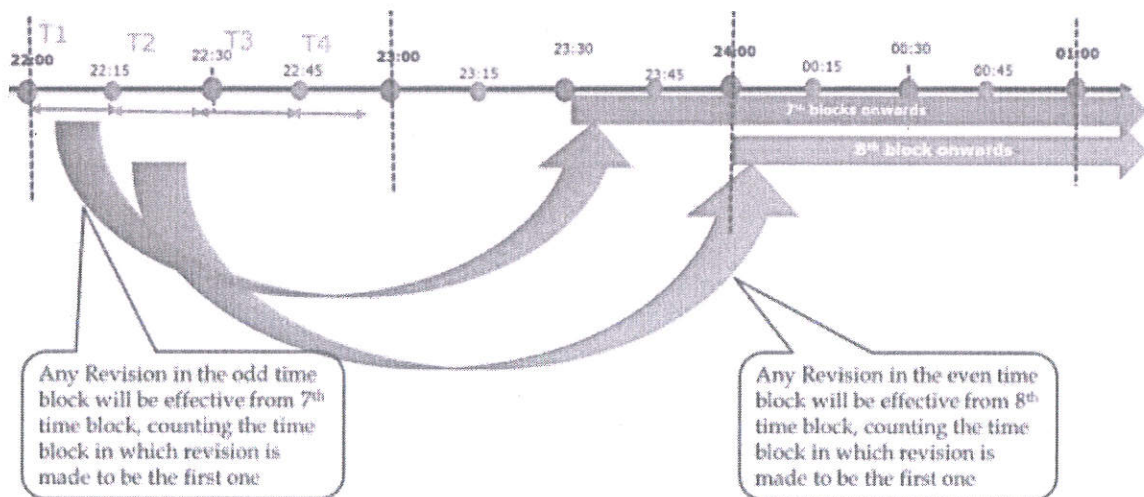
Introduction of half hourly market is a welcome step as the same provides an alternate option to the Discoms to address real time power shortage/surplus issues and offers an opportunity for cost optimization as well as avoiding DSM penalties. Further, the same shall also enhance Grid Security as all the stakeholders would have an option to arrange/dispose power close to the real time conditions thereby minimizing the chances of Grid Imbalance. Tata Power-DDL comments/suggestions on the same are as appended below:

Tata Power-DDL Comments on the same are as mentioned below:-

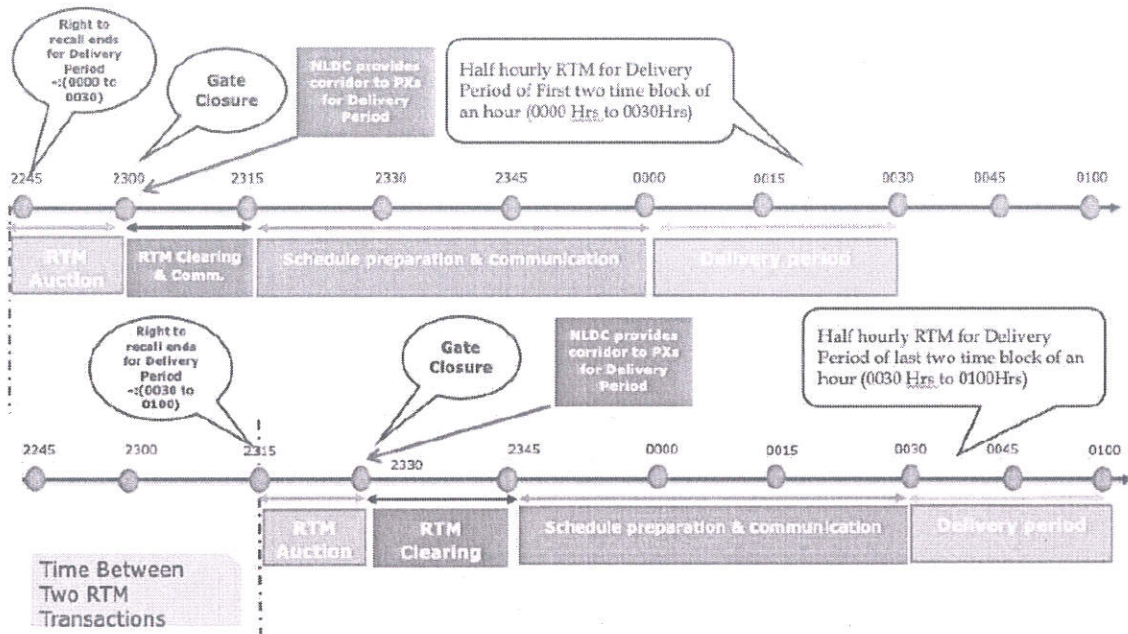
The explanatory memorandum mentions that Buyers/sellers would have the option of placing buy/sell bids for each fifteen minute time block in the half hourly Real Time Markets. Further, concept of gate closure has been introduced in the context of Real Time Markets and there is certain modifications in the "Right to Recall/Schedule Revision" available with the Discoms in relation to long term PPA's.

The Schematic representation of the proposed changes to the right to revision of schedule and RTM clearing and scheduling methodology has been appended below as image-1 & Image-2.

Picture-1



Picture-2



Following needs to be clarified in this regard:

There may be a case wherein, a Discom is having a shortfall and its' purchase bid is not cleared in RTM. At the same time, the generator-G1 with whom the Discoms has PPA places sale bid in RTM and its sale bid is not cleared in RTM. In this case, the Discoms remains in shortage and at the same time the URS capacity of the Generator remains un-dispatched. From the above, it is understood that, there is a gap of 4 Time blocks between RTM Auction and delivery period. It is submitted that in such cases, Right to Recall of the Discom may be restored & the Discom may be allowed to schedule its share of power from the generator G1 which remains unsold in RTM, as and when required. The same will enable the Utilities to utilize its legitimate share of power in case of any contingency and the generator will get the maximum schedule, which otherwise would remain unutilized.

Further, availability of sufficient Transmission Corridor needs to be ensured for success of RTM. There may be a case where, a Discom/Utility purchases power under RTM and the same is not actually scheduled to the buyer on account of transmission constraints/Issues. In such case, who will be responsible to arrange this power for the Discoms and further, who will be responsible for the payment of DSM charges to be incurred by the Discoms in such case? The same may be clarified. We suggest that, as both Discoms and generators are obligated to schedule the power committed under RTM, the transmission companies should also be made responsible/accountable for not being able to provide the transmission corridor as per the requirement.