



उत्तर प्रदेश पावर कारपोरेशन लिमिटेड

(उ० प्र० सरकार का उपक्रम)

U.P. POWER CORPORATION LIMITED

(Govt. of Uttar Pradesh Undertaking)

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No. 668 /RAU/CERC

Dated: 05 September, 2019

The Secretary,
Central Electricity Regulatory Commission,
Chanderlok Building, 36, Janpath,
New Delhi- 110 001

Through e-mail, Portal & Speed Post

Subject: Comments on Draft Indian Electricity Grid Code and Real Time Markets in India.

Sir,

Please refer Hon'ble Central Electricity Regulatory Commission's Draft notification No. L-1/18/2010-CERC Dt. 06.08.2019, L-7/105(121)/2007/CERC Dt. 06.08.2019 and "*Real-Time Markets for Electricity Explanatory Memorandum*". Comments of the Stakeholders has been invited by 05.09.2019.

With regard to the same, comments of U.P. Power Corporation Ltd. on Draft Indian Electricity Grid Code and Real Time Markets in India is hereby annexed for kind consideration of the Commission.

Encl: As above

Yours faithfully,


(Niraj Agrawal)
Chief Engineer (RAU)

Comments on Draft Indian Electricity Grid Code and Real Time Markets in India to be submitted to CERC:

1. According to proposed point 3.1.5 of the draft, under real time markets the utilities and load dispatch centers can implement the change in schedule from the 7th or 8th time block as against the present provision of from 4th time block thereby diluting the flexibility of utilities and the grid operator. With this new arrangement, any sudden surge in demand for the utility could not be managed by the system operator because unutilized power once sold in real time market without consent (as stated in the draft) of the utility will not be available. In such situation utility will be forced to pay more DSM. Hence the consent of the utility should be made compulsory and the operation of real time market should be designed in a manner in which present provision of from 4th time block does not get disturbed.
2. The time blocks for the power rescheduling have been proposed to be 7th or 8th depending on the odd or even time block requests respectively, whereas 5th amendment of DSM Regulations has implemented sign reversal from 6th time block w.e.f. 01st April 2019. This is in complete contrast as then the load dispatch centers will not be left with any choice to control DSM enforced within the time specified.
3. At present, surrendered power of utility is treated as URS meaning thereby that fixed charges are also recovered by the utility whereas in the new mechanism fixed charges are not recovered by the Utility.
4. However, referring to point 3.3.3, if implemented, then the gain from power sale should be shared in the ratio of atleast 80-20 between utility and generator respectively because of the following reasons:
 - Fixed Charges are always Utilities liability and thus the profit sharing must be more for Utilities.
 - Since the power surrendered under URS was always subject to flexibility that if needed then the utility could recall the surrendered power but new regulation does not allow so. Hence the utility will end up arranging the power as per the need from the market which will be at a higher cost. Therefore to partially compensate the utility reasonably the share in gain should be atleast 80-20 between utility and generator respectively.




ED, PMC

By: Power Management Cell, UPPCL