



**TRANSMISSION CORPORATION OF TELANGANA LIMITED
VIDYUT SOUDHA::HYDERABAD - 82**

Website:www.tstransco.in CIN No.U40102TS2014SGC094248

From
Chief Engineer/SLDC,
TSTransco, Room No.613,
Vidyut Soudha, Khairatabad,
Hyderabad- 500082.

To
Secretary, CERC.
3 rd & 4 th Floor, Chanderlok Building
36, Janpath, New Delhi- 110001.

Lr.No.CESLDC/SESLDC/DEPP1/ADE-2/F.CERC/D.No.247/19, Dt:06.09.2019

Sir,

Sub: TSTransco - SLDC – Real Time Market - Draft amendment regulations notified
by CERC - Submission of comments - reg.

Ref: Public Notice No.RA-14026(11)/2/2018/CERC, Dt:06.08.2019.

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With reference to the above, I am directed to submit the following views on the proposed draft regulations, for your kind consideration.

a) Regulation 6.5.18 of IEGC

The following are the views of TSTransco:

With the penetration of large quantity of RE Generation, the variability is increasing which is posing challenges to the system operator to minimize deviations and also to meet sign change requirement. The failures leading to payment of Deviation charges including additional Deviation charges, and penalties for sign change.

To implement these existing stringent operational parameters itself need flexibility to system operator to handle high variable RE Generation.

Under these scenario, further increase in revision notice time line to 8/7 time block in respect of ISGS stations will lead to more Deviations in the Grid parameters in turn attract huge penalties to Discoms in addition to loosing right to recall power from Long Term Generators for which Discoms are committed to pay fixed charges. With this proposed Amendment, the Discoms are forced to approach Real time market to meet sudden variations with extra cost by loosing right to recall power from Long Term Generators.

This will also further aggravate when Intrastate ABT is implemented in state level.

Also, the concept of keeping Hot spinning reserve also defeated. In the absence of Hot Spinning Reserve persistent deviations will be there from schedules.

Therefore, it is requested to continue an existing right of Discoms to revise the schedules of Long term Generators within 4 time block notice.

However, any planned Revisions with the prior consent of Discoms/SLDC during Intra day like Day ahead may be proposed.

P.T.O.

b) Regulation 6.5.18(a) of IEGC

The following are the views of TSTransco:

Suitable Amendment may be incorporated such that the Generator has to compensate the loss of Generation to Discoms by buying power from Real Time Market for the scheduled quantity just before forced outage.

c) Regulation 6.5.19 of IEGC

The following are the views of TSTransco:

Suitable Amendment may be incorporated such that the Generator has to compensate the loss of Generation to Discoms by buying power from Real Time Market for the scheduled quantity just before forced outage.

d) Regulation 6.5(A).c of IEGC

The following are the views of TSTransco:

With the due consent of beneficiary on similar lines of Day ahead advance surrender.

It is requested to kindly consider the above views and suitably amend the draft proposed amendment regulations.

Yours faithfully,


Chief Engineer/SLDC

Copy submitted to Director (Grid Operations)/TSTransco.

Copy to:

Superintending Engineer/Tech. to Chairman & Managing Director/ TSTransco.

P.S.to Joint Managing Director (Finance, Comml., & HRD)/TSTransco.

Member Secretary/SRPC/29, Race Course Cross Road/Bengaluru-560009 } for favour of
Executive Director/SRLDC/ 29, Race Course Cross Road/Bengaluru-560009 } information.