

**SUGEN
MEGA POWER PROJECT**

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TPL/SUGEN/COMMERCIAL/19-20/038

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The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building,
36, Janpath,
New Delhi - 110 001

Sub: Proposed framework for Real-Time Market for Electricity

Dear Sir,

This is in reference to Public Notice NoRA-14026(11)/2/2018/CERC dated 6th August 2019.

We humbly submit our observations on proposed framework for Real-Time Market for Electricity as Annexure-1. We look forward to the Hon'ble Commission's positive consideration of such our submission.

Yours faithfully,
For **Torrent Power Limited**


Authorised Signatory



Encl: Annexure-1

Annexure-1

Submission of Torrent Power Limited – Generation on Proposed Framework for Real-Time Market for Electricity

- **Uniformity of Gate Closure at CERC and SERC:** The proposed amendment in IEGC is applicable at regional level i.e. to be followed by regional entities. However, it may happen that the State Grid Code / Scheduling Process may not be in sync with the IEGC e.g. SLDC may be accepting revision in schedule for intra-state entities after Xth time block whereas RLDC may be accepting revision after Yth time block at regional level. In view of the same, Some ISGS (whose scheduling is done by SLDC) may face difficulties to assess surplus power and may be deprived to participate in the market. In view of the same, it is requested that the proposed framework for Real Time Market is to be implemented after making Gate Closure concept uniform across central and state level as per the requirement of Real Time Market.
- **Power Exchange(s) Transaction / Membership Fees and Scheduling & Operating Charges of RLDC/SLDC:** It may be reasonably estimated the proposed Real Time Market framework will increase no of transaction on the Power Exchange(s). Further, the transaction quantum would also vary significantly for each individual entity (buyer/seller). In this context, we humbly submit to review existing fees charged by the Power Exchange(s) and Scheduling & Operating charges of RLDC/SLDC. Further, it is to be noted that there is only two active Power Exchange(s) available to the market.
- **Ancillary Services Market :** We humbly submit that with implementation of Real Time market, Ancillary Service may act as parallel market of Real Time Market. As of now, the participation in Ancillary Service market is also very limited. There would be generators which currently cannot participate in the Ancillary Service market. Hence, the Ancillary services are to be merged with Real Time Market and any need of Ancillary service is also to be met through Real Time Market only.
- **Deemed Standing Clearance of State Load Despatch Centre / Beneficiary:** The Regulations 8(2) & 8(3) of Open Access Regulations provide for standing clearance of the concerned SLDC for sale of power on the Power Exchange(s). In this context, we humbly request the Hon'ble Commission to allow sale of power on the Power Exchange(s) for Real Time Market without such prior standing clearance (or some appropriate & practical provisions may be introduced) which is not practical to receive from the concerned SLDC specifically for varying real time quantum (unrequisitioned quantum of beneficiaries) available for sale in each half an hour block.

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