

To

Dated:- 5th September 2019

The Secretary
Central Electricity Regulatory Commission
3 rd & 4 th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001

Sub:- RPTCL Comments /Suggestions / Objections on CERC Proposed framework for Real-Time Market for Electricity


Respected Sir,

With reference to your public notice **No. RA-14026(11)/2/2018/CERC, dated 6th August, 2019**, please find enclosed herewith (**as Annexure-I**), our Comments /Suggestions / Objections on the Explanatory Memorandum for Real-Time Market and proposed amendments / enabling provisions in the relevant regulations. Our comments have been uploaded through SAUDAMINI Portal also.

The above is for your kind consideration please.

Thanking you

Yours Faithfully



MANAGER- Power Trading

Enclosures:-

- 1) Annexure-I as cited above.

RPTCL Comments /Suggestions / Objections on Real Time Market Explanatory Memorandum draft and amendments to the enabling provisions contained in: (i) Central Electricity Regulatory Commission (Indian Electricity Grid Code), 2010; (ii) Central Electricity Regulatory Commission (Power Market Regulation), 2010; (iii) Central Electricity Regulatory Commission (Open Access in inter-State Transmission) Regulations, 2008

References	RPTCL Comments /Suggestions / Objections
General Comment on Explanatory Memorandum	With the advent of the real time market, it is felt that to begin with, stakeholders' participation will be encouraged if some waiver is given to the market participants in fees and charges to be charged by the power exchanges and system operators.
General Comment on Explanatory Memorandum	<p>It is felt that participation in real time market will require considerable knowledge of the market dynamics by the participating stakeholders on a continuous basis. There may be a requirement of handholding in the beginning for understanding of the processes involved especially by the state DISCOMS.</p> <p>In view of this fact, it is proposed that Hon'ble Commission may kindly consider assigning the control initially to the system operator (NLDC) for all the activities related to real time market. This will bring in trust in the market and also help the stakeholders for better understanding of the processes.</p> <p>Subsequently, if felt by Hon'ble Commission, activities like settlement, coordination and communication to/with market participants can be re assigned to power exchanges.</p>
General Comment on Explanatory Memorandum	Hon'ble Commission allowed right to recall by beneficiaries as explained in the memorandum. It may please be noted that the generators can bid the surplus surrendered quantum by the DISCOMS for sale in real time market with in a window of 7 or 8 time blocks from actual delivery of power. In view of the same, provision for down ward revision in schedule by DISCOMS should be regulated from the present allowable limits of 4 time blocks as allowed under IEGC so that the generators can sell their surrendered quantum in real time market.
General Comment on Explanatory Memorandum	It is felt that 15 minutes timeline for bid submission in real time as opposed to the window of 2 hours provided to the bidders in day ahead market, is on lower side in case multiple bids by the traders from multiple parties are to be submitted. The stakeholders will need some time to automate their systems in order to execute their bid placements correctly within such 15 minute bid window. In view of above, Hon'ble Commission may kindly consider increasing this timeline initially to a feasible value without affecting the other processes.
General Comment on Explanatory Memorandum	Presently as per IEGC 5 th Amendment Regulation, in the event of forced outage of a Generating Unit, the revised schedule will come into effect after 4-time block, counting the time block in which the request for revision has been received by the LDC to be the first one. To avoid a high penal consequence during forced outage for a participating generator in real time market, we request the Hon'ble Commission to continue the existing



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	provisions of IEGC regulations for revision in schedule by a generator with 4 time blocks during forced outage.
General Comment on Explanatory Memorandum	The timeline and delivery period proposed is suitable for DISCOMS planning to balance their sudden surge/drop in demand, but the growth of Collective transactions (DAM) has been primarily fueled by small retail consumers looking to effectively reduce their cost. For a small consumer, planning their demand/drawl pattern for every two time blocks is very difficult and complicated. It is much more viable for open access customers to plan for their demand schedule for a minimum of four time blocks at a stretch as most of the industrial consumers/open access consumers have a stable load factor (without much variation). Hon'ble Commission may kindly like to examine this aspect to promote the participation of retail open access consumers in the proposed real time market, and to ensure sufficient liquidity in the proposed market.
General Comment on Explanatory Memorandum	There should be some mechanism to fast track the NOC process required for participation in the proposed market. There may be cases where an IPP which has a NOC for selling power in the Collective Transactions market(PX1 format), may require sudden power for starting up the plant after a period of shutdown. In order to bring that volume in the proposed market and for them to take advantage of this proposed real time market, some redesigning of the process of getting NOC is required, i.e. process to fast-track the application and an NOC issued for may be one or two days for meeting this specific demand from real time market.
General Comment on Explanatory Memorandum	It is felt that since in the real time market the requirements are met on real time basis, therefore it is requested that the platform of NOAR (National Open access Registry) must be implemented and aligned with RTM market, prior to bringing in this real time market. This will enable the aspiring participants to avail the benefits of RTM market and also will enhance the liquidity in the market.

