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BIHAR STATE POWER (HOLDING) COMPANY LIMITED
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A Govt. of Bihar Undertaking
(Power Management cell)

CIN - U40102BR2012SGC018-195

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From,

Abhijeet Kumar,
Chief Engineer, Power Management Cell
BSPHCL,

To,

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

Sub: The comments / suggestions / objections on the proposed framework for Real-Time Market for Electricity.

Sir,

With reference to the subject cited above please find enclosed herewith the comments / suggestions / objections on the draft regulations of following:-

- (i) CERC (Indian Electricity Grid Code), 2010 (Annexure I).
- (ii) CERC (Open Access in inter-State Transmission) Regulations, 2008 (Annexure II);
- (iii) CERC (Power Market Regulation), 2010 (Annexure III); for further needful.

Enclosure: - As above

Yours faithfully,


(Abhijeet Kumar)

Annexure-I
IEGC Regulation 2010

S.No.	Description	Observation /Suggestion
1-	<p>Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2010</p> <p><u>Clause 5, Part 6 Regulation 6.5 (To be Added)</u></p> <p>“(aa) Scheduling of Real-time collective transaction: NLDC shall indicate to Power Exchange(s), margin available in each of the transmission corridors before the gate closure, i.e. before the window for trade closes for a specified duration. Power Exchange(s) shall clear the buy and sell bids for the said duration under consideration on various interfaces or control areas or regional transmission systems as intimated by NLDC. The limit for scheduling of collective transaction during real time for respective Power Exchanges shall be worked out in accordance with the directives of the Commission. NLDC shall furnish the available transmission corridors to the Power Exchange(s) before the trading for real time market or a specified duration closes. Based on the information furnished by NLDC, Power Exchange shall clear the RTM bids and announce the Market Clearing price and volume. Based on the volume cleared by the Power Exchanges, NLDC shall communicate the schedules to the respective RLDCs. After getting confirmation from RLDCs, NLDC shall convey the acceptance of scheduling of collective transaction to Power Exchange(s). RLDCs shall schedule the Collective Transaction at the respective periphery of the Regional Entities.”</p>	<ul style="list-style-type: none"> - We request the commission to publish the corridor availability data in public domain so that buyer/seller will be able to make better decision before participating in the Market.
2-	<p><u>Clause (18) of Regulation 6.5 of Part 6 of the Principal Regulations</u></p> <p>“18. Revision of declared capability by the ISGS(s) having two-part tariff with capacity charge and energy charge and requisition by beneficiary (ies) for the remaining period of the day shall also be permitted with advance notice. Any revision in schedule made in odd time blocks shall become effective from 7th time block and any revision in schedule made in even time blocks shall become effective from 8th time block, counting the time block in which the request for revision has been received by the RLDCs to be the first one</p>	<ul style="list-style-type: none"> - In future this provision may include reduction in timing on maturity of the market - The RE generating plants should also be included as , the whole activity is being done absorb the variable generation by RE sources .
3-	<p><u>Regulation 6.5(A) of part 6 of the Principal Regulations</u></p> <p>Clause (c) shall be substituted as under: “(c) An ISGS may sell power from the share of its original beneficiaries in the day-ahead Market with the consent of such beneficiaries; and in the real-time market without the requirement of consent from the beneficiaries, before the trading for the real time market for a specified duration commences. In both the cases, the realized gains shall be shared between the ISGS and the concerned beneficiary in the ratio of 50:50 or as mutually agreed between the ISGS and concerned beneficiary in the billing of the following month. This gain shall be calculated as the difference between selling price of such power and fuel charge including incidental expenses.</p> <p>Provided that such sale of power by ISGS shall not result in any adverse impact on the original beneficiary (ies) including in the form of higher average energy charge vis-à-vis the energy charge payable without such sale: Provided further that there shall be no sharing of loss between the ISGS and the beneficiary (ies): Provided also that, the liability of fixed charge in such cases shall remain with original beneficiary (ies) as determined in accordance with the Tariff Regulations notified by the Commission from time to time.”</p>	<ul style="list-style-type: none"> - The consent of Discom shall be mandatory in case on Real Time Market.

BSPHCL would like to request to add the following Points after the Regulation 6.5(A) of part 6 in interest of the **beneficiaries will also be benefited**

- 1- *There should be some Provision on generator side for arrangement of Power from alternative source as Utilities are paying the Fixed charge for Plants and should be benefited.*
- 2- *We request the commission to publish some guideline as many of the generators give less DC and sell power in peak hours when the rates are high as there is no penalty/or liability to follow DCArd every time beneficiaries are sufferer.*

Annexure-II
Central Electricity Regulatory Commission
(Open Access in inter-State Transmission) Regulations, 2008

S.No.	Description	Observation /Suggestion
1-	<p>These regulations may be called the Central Electricity Regulatory Commission (Open Access in inter-State Transmission) (Sixth Amendment) Regulations, 2019.</p> <p>Amendment to Regulation 13 of the Principal Regulations</p> <p><i>All the entities participating in the real-time market for a specified duration may place their bids and offers on the Power Exchanges for purchase and sale of power. The window for trade in real-time market for day (D-0) shall open from 22.45 hrs to 23.00 hrs of (D-1) for the delivery of power for the first two time blocks of 1st hour of (D-0) i.e., 00.00 hrs to 00.30 hrs, and will be repeated every half an hour thereafter. The bidding mechanism for the real-time market shall be double-side closed bid auction for delivery of power in each time block of that hour. The Nodal Agency shall indicate to the Power Exchange(s) the available margin on each of the transmission corridors before the gate closure, i.e. before the window for trade closes for specified duration. The power exchanges shall clear the real-time market from 23.00 hrs till 23.15 hrs based on the available transmission corridor and the buy and sell bids for the RTM for the specified duration. Then the cleared bids shall be submitted by the Power Exchanges to the Nodal Agency for scheduling. The Nodal agency in accordance with the detailed procedure shall announce the final schedule by 23.45 hrs of (D-1) and communicate to the RLDCs to prepare the schedule for dispatch.</i></p>	<ul style="list-style-type: none"> - <i>We request the commission to please direct NLDC to publish the corridor availability data public so that buyer/seller will be in better position to decide before participating in Market</i> - <i>NOAR should be in place before implementation of Real Time Market.</i>
2-Ac	<p>Amendment to Regulation 20 of the Principal Regulations</p> <p><i>Clause (1) of Regulation 20 of the Principal Regulations shall be substituted as under:</i></p> <p><i>"(1) All transactions for State utilities and for intra-State entities scheduled by the nodal agency under these regulations, after accounting the changes in the schedules after the execution of the real-time market, shall be accounted for and included in the respective day-ahead net interchange schedules of the concerned regional entity issued by the Regional Load Despatch Centre."</i></p>	<ul style="list-style-type: none"> - <i>Separate energy accounting for Real Time Market to be done by NOAR /RLDC</i>

Annexure-III
Real-Time Markets for Electricity

S.No.	Description	Observation /Suggestion
1-	3.1 Introduction of Gate Closure and Real time market	<ul style="list-style-type: none"> - It has been observed that many of the Generators wilfully give lesser Declared Capacity (DC) when the prices are high in IEX (Peak Hours), we propose that participation for RTM should not be on this cost & Discom should not be sufferer of gaming by Generators, we request honourable Commission to look into the same and avoid any kind of gaming from Generators. - Liquidity for RTM is also a concern as most of the participation has to come from state Utilities. - We request the commission to make it mandatory for Power plants to fulfil the power supply condition even in force outage condition so that contractual obligation and liquidity with market in RTM can achieved in most efficient way.
2-	3.2 Time line for Real-Time Market	<ul style="list-style-type: none"> - It has been observed that many of the State Utilities work manually for providing consent /NOC, automation in terms of giving consent can be key to succeed for RTM . - We also request CERC to please first Implement NOAR for faster and efficient working before going for RTM .