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No. Coml / Tariff / CERC / 2503   **Dated: 21.06.2019**

To
The Secretary
Central Electricity Regulatory Commission
3rd and 4th Floor, Chanderlok Building, 36, Janpath, New Delhi – 110 001.

Sub   : Comments on '**Indian Electricity Grid Code and Other related issues**'

Ref   : Public Notice by Hon'ble CERC dated 10.06.2019

Dear Sir,

This is in reference to the public notice dated 10.06.2019 regarding 'Indian Electricity Grid Code and Other related issues' wherein the comments/suggestions of the stakeholders were solicited for consideration of the same.

Accordingly, comments/suggestion of DVC is enclosed herewith for your kind perusal please.

Yours faithfully,

Enclosure: - As stated above

Executive Director (Commercial)

1. *Part-1: General, Sl. no.1.3 (ii): Scope:*
   Amendment in last line of the Clause may be made as follows:
   "Accordingly Central load Despatch at Maithon.......area of DVC." to be replaced by
   *"**Accordingly State Load Despatch Centre at Howrah shall perform functions of SLDC envisaged in this code for the area of DVC".***

2. *New inclusion in Part-3: Planning Code:*
   Keeping in view, the load Growth in a State and its impact on neighbouring systems / tie lines, a six-monthly/ yearly review / audit in coordination with CTU/RLDC/RPC may be made mandatory for healthy system operation satisfying (n-1) contingency.

3. *New inclusion in Part-5: Operating Code, Sl. no.5.2: System Security Aspects:*
   Provision of Reward Scheme for Generators for best performance in RGMO response/Dynamic response may be included.

4. *New inclusion in Part-5: Operating Code, System Monitoring:*
   Real time data of all intra-state OA customers, captive generators, RE generators to be mandatorily made available to SLDC.

5. *Part-5: Operating Code, Sl. no.5.3: Demand Estimation for Operational Purposes:*
   A common algorithm/analytics of Demand Estimation may be developed by POSOCO/CTU and mandatorily incorporated in SCADA software for day/week/month ahead demand estimation by SLDCs based on their real time data available thru' SCADA to maintain uniformity pan-India instead of leaving the onus on SLDCs.

6. *Part-5: Operating Code, Sl. no.5.4: Demand Management*
   To implement Demand management by disconnecting Demand at the time of crisis, there must be a software based tool to determine system frequency response (estimation for shedding of load for every frequency (MW/HZ)) so as to ascertain the constituent wise responsibility to shed the load at the time low frequency for every fall of frequency below 49.8
   This information should be available in real time at all RLDC website as well as at SLDC website so as to take action by SLDC in automatic demand management.

7. *New inclusion in Part-6: Scheduling and Despatch Code:*
   (i) DISCOM allocation of a state may be made mandatory where the state is having Embedded export oriented generators (i.e. generators having partial allocation to beneficiaries and rest portion belonging to the state without any specific allocation).

   (ii) SLDC scheduling software (for LTOA, MTOA, STOA, collective) to be integrated with RLDC scheduling software for saving of time & elimination of errors in real time, keeping in view the ensuing 5-minute scheduling in future.

8. *New inclusion in Part-6: Scheduling and Despatch Code, Sl.no. 6.3B: Technical minimum schedule for operation of CGS and ISGS:*
   For Thermal Generators having partial allocation and for Embeded Generators mandatory provision may be made in IEGC, in case of surrender of power by beneficiaries to accept the TML of Generators or otherwise Compensation mechanism may be allowed as with CGS and ISGS as well.

9. *As per recommendation by various committees*
   (i) Minimum strength of Manpower of SLDCs may be specified.
   (ii) Implementation of Ring fencing of all SLDCs may be made for integrated and smooth operation of the grid.