



**NABHA POWER LIMITED**

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Ref: NPL/LCR/19-20/6907

Date: 11.07.2019

To,

**The Chief Engineer,**

Member Convener

Central Electricity Regulatory Commission,

3rd & 4th Floor, Chanderlok Building,

36, Janpath, New Delhi -110001

**Sub: Constitution of Expert Group to review "Indian Electricity Grid Code and other related issues".**

**Ref: - Your Notice no. ENGG/2012/1/2019-CERC, dated 21st June 2019**

Dear Sir,

In reference to your notice above, please find enclosed comments on the same on behalf Nabha Power Limited having 2X700MW Coal fired Thermal Power Plant at Rajpura, Punjab.

This is for your kind consideration.

Thanking you,

**For Nabha Power Ltd**

  
(Authorised Signatory)

Encl: As above.

## Comments & Suggestions on Existing Indian Electricity Grid Code

S.No.	Clause as per Existing regulation	Comments/Modification/inclusion	Rationale
1.	<p><b>6.5.18 (a)</b> Notwithstanding anything contained in Regulation 6.5.18, In case of forced outage of unit, for those stations who have a two part tariff based on capacity charge and energy charge for long term and medium term contracts, the RLDC shall revise the schedule on the basis of revised declared capability. <b>“The revised declared capability and the revised schedules shall become effective from the fourth time block, counting the time block in which the revision is advised by the ISGS to be the first one.”</b></p>	<p><b>Modification:</b> “The revised declared capability and the revised schedule shall become effective from the next time block, counting the time block in which the revision is advised by the ISGS to be the first one.”</p>	<p>The forced outage cost incurred due to implementation of schedule from 4<sup>th</sup> time block is very high. Additional burden of UI should not be imposed on power producers in case of forced outages.</p>
2.	<p><b>6.4.21</b></p>	<p><b>Inclusion:</b> If there is a time difference of more than 5% of a time block in the main/check meter with standard time, meter shall be immediately replaced by a new calibrated meter by distribution license or generating company who owns the energy accounting.</p>	<p>In meter regulation 2016, error related to time difference in the meter is not specified. This time drift cause huge UI deviation to the generators particularly during Load Ramp-up and Ramp down.</p>
3.	<p><b>6.5.20</b></p>	<p><b>Comment:</b> The numbers of revisions in Schedule by the beneficiaries except in case of emergencies must be capped. This depicts the planning and monitoring effectiveness. At present there is no limits defined for no. of revision of schedule in a day, many times the schedule revision exceeds 25 in number for a day and are more frequent.</p>	<p>This majorly impacts on unit efficiency, emissions, natural resource depletion etc.</p>



4.	<p><b>6.3A (iii)(b)</b> The main plant equipment and auxiliary system including Balance of Plant, such as Fuel Oil System, Coal Handling Plant, DM Plant, Pretreatment Plant, Firefighting System, Ash Disposal System and any other site specific system have been commissioned and are capable of full load operation of the units of the generating station on sustained basis.</p>	<p><b>Inclusion:</b> The main plant equipment and auxiliary system including Balance of Plant, such as Fuel Oil System, Coal Handling Plant, DM Plant, Pretreatment Plant, Firefighting System, Ash Disposal System, FGD System and any other site specific system have been commissioned and are capable of full load operation of the units of the generating station on sustained basis.</p>	<p>The MoEF&amp;CC by vide its notification dated 07.12.2015 introduced norms related to the SOx and NOx emission. Due to SOx emission norms, FGD has become mandatory to establish in thermal power plant.</p>
5.	<p><b>Calculation methodology related to RGMO Compliance</b></p>	<p><b>Inclusion:</b> The detailed standardized methodology for calculation of FRC (RGMO) achieved by Generators should be made a part of Grid code for clear understanding by all Generators. Methodology for categorization of compliant &amp; partially compliant should be a part of the Grid code</p>	<p>This will help Generators take corrective actions and do fine tuning required, if any.</p>

