

PTC India Limited's comments/suggestions on Indian Electricity Grid Code

1. As per clause 6.5, Pt. 34 of Principal Regulations – “While availability declaration by ISGS shall have a resolution of one (1) MW and one (1) MWh, all entitlements, requisitions and schedules shall be rounded off to the nearest two decimal at each control area boundary for each of the transaction, to have a resolution of 0.01 MW and 0.01 MWh.”

However, RLDC's are following different principals and some RLDC's are declaring schedules upto 6 decimal places at Generator Periphery/Buyer Periphery. This is leading to discrepancy and mismatch between RLDCs in cases of energy billing.

2. As per amendment of part 6 of the Principal Regulations clause (5) dated 12th Apr-17 - "Provided that the generator or trading licensee or any other agency selling power from the generating station or unit (s) thereof may revise its estimated restoration time once in a day and the revision schedule shall become effective from the 4th time block, counting the time block in which the revision is advised by the generator to be the first one.”

The buyer is in a flux situation as he can't procure power from other sources, fearing that the generator may revive anytime, thereby leading to doubling up of generation (in case he procures power to mitigate the power crisis). And if he waits for the generator to revive, there is no surety that the generation will come on-bar.

3. As per IEGC 6.38, CGS or ISGS, whose tariff is either determined or adopted by the commission, technical minimum should be 55% of MCR.

As per this provision, in case a generator have 2x300 MW installed capacity and only part capacity is tied up with long term beneficiary and beneficiary refuses to accept schedule of minimum 55% of the installed capacity stating that as per the regulation the beneficiary has to accept upto 55% of MCR or the contracted capacity whichever is lower. In that case, plant would not be able to achieve technical minimum.

4. Hydro power scheduled from one region to the other region having different peak hour declared by RLDC's are facing difficulty for PAFM

certification which is linked with availability during peak hours which is not uniform across RLDCs.

5. Hydro generators are allowed to declare 10% overload and beneficiaries are allowed to accept this overload as per their requirement. However beneficiaries are not accepting the fixed cost liabilities for 10% overload in case they are not scheduling the overload capacity.

6. Scheduling procedure adopted by RLDC:

A. For ISGS: Only one set of data is punched and the same is reflected across all RLDC's i.e. seller RLDC, buyer RLDC and intervening RLDC (if any).

B. For LTA/MTOA Contract of IPPs:

i. In case, Supplier and buyer are in same region: Only one set of data is required to punch and the same data is reflected in seller schedule as well as buyer schedule

ii. In case, Supplier and buyer are in different region: Both seller and buyer are required to punch in their respective RLDC's. In addition to that, separate punching is also required in intervening RLDC (if any). As both the data i.e. seller RLDC and buyer RLDC are independent, discrepancy occurs many a times due to time mismatch causing dispute in the contracts.

A provision is required to be made so that only one set of data should be required to punch in case of IPP also (as for ISGS) and same data should automatically reflect across all concerned RLDCs in order to avoid any discrepancy.

7. Off late, many renewable generators are getting connected with the grid and supplying the power to the beneficiaries located in different regions and SECI has already processed the bidding of approx. 10,000 MW for wind generation. Since renewable energy is unpredictable in nature, hence to avoid load on grid and to save on DSM charges Renewable generators tend to use 16 revisions in a day. Thus, at many times it becomes very difficult to execute the same and as punching of schedules in all the concerned RLDCs,

including intervening RLDC if any, is required within the four time blocks available for revision which leads to discrepancy at many times.

For Example: One generator in SRLDC is scheduling power to Punjab (NR), Bihar (ER), thus punching of scheduling will be as follows:

SRLDC: Seller schedule block wise details of Punjab and Bihar will be punched

NRLDC: Beneficiary (Punjab) Block wise schedule details will be punched

ERLDC: Beneficiary (Bihar) Block wise schedule details will be punched

WRLDC: Being intervening region, Block wise schedule for Punjab and Bihar will be punched.

All the above mentioned activities are to be done within four time blocks allowed for revision, which at times creates discrepancy in schedule. It is requested that since these are long term transactions hence shall be scheduled as per methodology adopted for ISGS long term transaction, where punching should be allowed only in the RLDC where seller is located and data shall be visible to the respective beneficiary (ies) in different regions.

Even if that is achieved, it is to be noted that since one company will be coming up with “n” no. of projects thus their login credentials will be different hence API facility shall be provided for allowing them to punch their revision in seller RLDC without any much manual intervention. This will help in seamless large integration of Renewable energy in the grid.