

Email



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No. SRPC/MS/ 2020/

दिनांक/ Dated: 14th August, 2020

सेवामें/ To

सचिव / The Secretary

केन्द्रीय विद्युत विनियामक आयोग / Central Electricity Regulatory Commission

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36, जनपथ / 36, Janpath

नई दिल्ली / New Delhi-110 001

Subject: SRPC Secretariat Comments on the Draft Central Electricity Regulatory Commission (Regulation of Power Supply) (First Amendment) Regulations, 2020

Sir,

Kindly find attached the SRPC Comments on the Draft Central Electricity Regulatory Commission (Regulation of Power Supply) (First Amendment) Regulations, 2020 for your kind consideration please.

संलग्नक:यथोपरि/ Encl: as above

भवदीय/Yours faithfully,

ए बालन /A BALAN

सदस्यसचिव/Member Secretary

SRPC Secretariat Comments on the Draft Central Electricity Regulatory Commission (Regulation of Power Supply) (First Amendment) Regulations, 2020

S. No	Comments / Proposed amendments
1	<p><u>The following Para in the Principal Regulation 6 may be added:</u></p> <p><i>SLDC shall ensure that quantum of power regulated to the Defaulting Entity i.e. Regulated DISCOM(s) is not scheduled. The details sought by RLDC/RPC for scheduling/accounting shall be made available by SLDC for making the plan.</i></p> <p>SRPC explanation/justification:</p> <p>Generally, not all, few of the DISCOMs in a state may become Defaulting Entity. The scheduling/accounting is carried out by RLDC/RPC for the entire state as a single entity. For making the plan the percentage allocation to the Defaulting DISCOMs is required by RLDC/RPC. As the power is Regulated by RLDC at State periphery and the Defaulting Entity may continues to get power (and other DISCOMs power is reduced) the very purpose of Regulation of Power Supply is defeated.</p>
2	<p><u>The following Para in Principal Regulation 15 may be added:</u></p> <p><i>The word 'consultation' in Regulation 15 shall not be interpreted as 'consent' or 'concurrence' and it shall be sufficient if the generating company is informed three days in advance about the transmission licensee's plan to regulate the power supply to the Defaulting entity, along with tentative quantum of power sought to be regulated, source and duration of regulation of power supply after considering technical minimum requirement of the thermal units.</i></p>
	<p>SRPC explanation/justification:</p> <p><i>As per 59(a) of CERC Order dated 02.09.2015 in Petition No. 142/MP/2012</i></p>
3	<p><u>The following Para in Principal Regulation 16 may be added:</u></p> <p><i>Deviation, if any, due to tripping of unit during the sale of such regulated power, it shall be compensated by the Defaulting entity and these expenses shall be considered as incidental expenses.</i></p> <p>SRPC explanation:</p> <p><i>As per 59(b) of CERC Order dated 02.09.2015 in Petition No. 142/MP/2012 With respect to the impact of UI due to tripping of unit during the sale of such power under regulation, we are in agreement with the contention of NTPC that it should be compensated by the defaulting entity and these expenses shall be considered as incidental expenses under Regulation 16 of Power Supply Regulations.</i></p>
4	<p><u>New Regulation 19A under Chapter IV of Principal Regulation:</u></p> <p><i>The Regulated Entity shall continue to pay the Compensation charges</i></p>

	<p><i>for Part Load Compensation & Multiple Start/Stop of Units as the entitlement of the Regulated Entity from the Generating Station does not change as per Appendix II of CERC Order dated 05.05.2017 and with amendments thereof.</i></p> <p><i>SRPC explanation/justification:</i></p> <p>The Generating Station may get schedule less than 85 % during Regulation of Power is imposed to any one of the entity. As a result, Compensation for part load operation may arise and the payment sharing maybe computed including Regulated Entity because of regulated schedule with respect to its entitlement. Same may be the case if the unit(s) is taken for RSD during Regulation of Power Supply.</p> <p>and</p> <p><i>as per 59(c) of CERC Order dated 02.09.2015 in Petition No. 142/MP/2012</i></p> <p><i>'While formulating plan under Regulation 6 of Power Supply Regulations for RPS Regulations, there is a requirement to adhere to the technical minimum of a thermal generating unit. Moreover, operating at technical minimum would increase heat rate, secondary fuel oil consumption and energy charge for which a generating station needs to be compensated. The technical minimum and the compensation for increase in heat rate, secondary fuel consumption and energy charge are proposed to be included in the Grid Code through amendment. Accordingly, technical minimum in case of regulation of power supply will be governed as per the amendment to be notified to the Grid Code.'</i></p>
5	<p><u>New Regulation 19B under Chapter IV of Principal Regulation:</u></p> <p><i>In case the regulated power is used for RRAS Up, the amount received towards Fixed Charge shall be utilized by Regulating entity for adjusting the dues of the Regulated Entity.</i></p> <p><i>SRPC explanation:</i></p> <p>The Fixed Cost (FC) recovered though RRAS Up should not be refunded back to the Regulated Entity, rather it should be utilized for settling the dues of the Regulated Entity.</p> <p>As per Regulation 12(1) & 17 the liability to pay the capacity charges remains with Regulated entity.</p> <p>In case of Regulation of Power Supply by Transmission Licensee, it will not get FC during RRAS Up for dues settlement.</p>
6	<p><u>New Regulation 19C under Chapter IV of Principal Regulation:</u></p> <p>During the period of regulation of power supply, for defaults in payment of transmission charges, STOA (Both buy & Sell) to the regulated entity shall be denied by NLDC/RLDCs under Regulation 25A of Open Access Regulations from the date of commencement of regulation of power supply. NLDC/RLDCs shall deny short term open access to the defaulting entity without having to approach the Commission on the basis of the request of concerned RLDC or Central Transmission Utility, as the case may be. The denial of STOA same would be informed by NLDC to Power Exchanges.</p> <p><i>SRPC explanation:</i></p> <p><i>As per 59(c) of CERC Order dated 02.09.2015 in Petition No. 142/MP/2012</i></p> <p><i>'During the period of regulation of power supply, for defaults in payment of</i></p>

	<p><i>transmission charges, STOA to the regulated entity shall be denied by NLDC/RLDCs under Regulation 25A of Open Access Regulations from the date of commencement of regulation of power supply. When Regulation 25A is invoked independent of regulation of power supply, default trigger date for invoking Regulation 25A of Open Access Regulations shall be 90 days from the due date of payment of various charges covered under the respective Regulations. NLDC/RLDCs shall deny short term open access to the defaulting entity on occurrence of the default trigger dates as mentioned above without having to approach the Commission on the basis of the request of concerned RLDC or Central Transmission Utility, as the case may be.'</i></p> <p>And</p> <p>There is uncertainty whether the only buying has to be denied or both buying and selling has to be denied during Regulation of power Supply.</p> <p>The Regulated Entity should be denied the Power Exchange platform also.</p> <p>Whether STOA is to be denied for Regulation by Generating Company? If yes, it can be included in Regulation.</p>
7	<p><u>New Regulation 19D under Chapter IV of Principal Regulation:</u></p> <p><i>After the end of Regulation of Power Supply, the Regulating entity shall furnish a statement of status of dues etc. to Regulated Entity, RLDC, RPC & SLDC</i></p>
	<p><i>SRPC explanation:</i></p> <p>To document the complete information on the Regulation of Power Supply.</p>