

Abhishek Rohilla <cerc.abhishek@gmail.com>

Fwd: Comments/views/observations on Draft Central Electricity Regulatory Commission (Power Market) Regulations, 2020 - Reg.

1 message

Abhishek Rohilla <abhishek.rohilla@delhi.gov.in> To: cerc abhishek <cerc.abhishek@gmail.com>

20 February 2022 at 10:56

Regards, Abhishek Rohilla Dy. Chief (Engg.) Central Electricity Regulatory Commission 3rd Floor, Chanderlok Building, 36, Janpath, New Delhi-110001

Mb. 9643439120

---- Forwarded Message -----

From: "Shilpa Agarwal" <shilpa@cercind.gov.in>

To: "Abhishek Rohilla" <abhishek.rohilla@gov.in>, "Ratnesh Kumar" <ratnesh.cea@gov.in>

Sent: Wednesday, February 16, 2022 11:31:20 AM

Subject: Fwd: Comments/views/observations on Draft Central Electricity Regulatory Commission (Power Market) Regulations, 2020 Reg.

---- Forwarded Message ---

From: karansareen26@gmail.com

To: Sanoj Kumar Jha <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>

Sent: Tue, 15 Feb 2022 23:12:16 +0530 (IST)

Subject: Comments/views/observations on Draft Central Electricity Regulatory Commission (Power Market) Regulations, 2020 – Reg.

The Secretary, Central Electricity Regulatory Commission, New Delhi

Sir / Madam,

The comments/views/observations on Draft Central Electricity Regulatory Commission (Power Market) Regulations, 2020 of the undersigned (In individual/personal Capacity) are as follows:

1. In order to avoid disputes, the definition 2.1(ah) 'Renewable Hybrid Generating Station' may also include the minimum percentage of installed capacity or generation

of secondary and other sources in terms of main source.

2. The captive power plants are having the ability of power injection and drawl, the clause 5.3 may be modified accordingly.

3. As the performance of solar and wind hybrid renewable projects is being better than individual solar or wind plants, the clause 5.8 (vii) may be modified ".... solar power

generator or wind power generator or combination thereof".

4. In reference to variance in location of substation upto 5 km radius would provide variation in location of substation upto 10 kms. The same is being large and impacts all

entities, it may be confined to 3 kms radius only.

5. The meters are to be installed as per the CEA (Installation and Operation of Meters) Regulations, 2006, the clause 14.1 meters may be modified as "Central Transmission

Utility as per CEA (Installation and Operation of Meters) Regulations for and at...."

6. Presently, CEA is leading the planning of the transmission system and LTTCs are signing the agreement for the associated transmission system and paying the charges on

realization of the same. However, in case of GNA, the consent of states / LTTCs is not being required, which leads to excessive / unwanted

transmission system and

burden the public at large. Accordingly, a necessary checks and balances

2/28/22, 11:52 AM

may be incorporated in transmission system planning and development, including consent of

DISCOMs / states.

7. In reference to clause 21 regarding system study by nodal agency, in the interest of various stakeholders, it is suggested to make available these study cases and results

thereof on the website of nodal agency / public domain from time to time. 8. In reference to clause 18 and Annexure – I to determine the parameters for calculation of charges for GNA, it is opined that the peak drawl by states from ISTS grid vary

from year to year. In addition, improvement in performance of the states shall be incentivized and lower performing states shall be penalized. Thus, the years and peak

values considered to determine the changes for GNA shall be updated from time to time and accommodate the new profiles of states.

Thanking you,

Yours faithfully, Karan Sareen (In individual/personal Capacity) Address: Plot B-602, B-Block, Vasant Kunj Enclave New Delhi-110070