



Guj-SLDC/SCH/F-41/ 3797.

Date: 25/04/2015

To
The Secretary,
Central Electricity Regulatory Commission,
3rd and 4th Floor, Chanderlok Building,
36, Junpath.
New Delhi-110001

Sub: Comments of Gujarat SLDC, GETCO on proposed framework for forecasting, scheduling & imbalance handling for renewable energy (RE) generating stations based on wind and solar at Inter-State level.

Respected Sir,

With reference to the above, comments of Gujarat SLDC, GETCO on proposed framework for forecasting, scheduling & imbalance handling for renewable energy (RE) generating stations based on wind and solar at Inter-State level is as under.

➤ Para 3.0

Proposed:

"The following methodology proposed for forecasting, scheduling and imbalance handling of wind and solar generators would be applicable for the inter-state wind and solar energy generators whose scheduling is done by RLDCs."

Comments:

At present, the quantum of RE power scheduled by RLDCs across the country is negligible compared to the total installed capacity of RE power. Almost, all the capacity is connected with the state grid. Further, at present, Renewable Regulatory Fund mechanism (RRF) is limited to scheduling and forecasting only. Commercial mechanism/settlement outlined in RRF mechanism is suspended till further order in the matter. Without commercial settlements, it has lost its sanctity. With the various favorable and encouraging government RE policies, the quantum of RE integration to the grid is being increased on regular interval. Handling of such a large RE injection (and its variation) to the grid has become one of the major challenges for the system operator. Hence, it is worthwhile to consider all the RE connected to State grid (whose scheduling is done by SLDC and comprises all most all the capacity of each State in the country) is also required to cover under this proposed framework. Hence, para 3.0 is proposed as under:

"The following methodology proposed for forecasting, scheduling and imbalance handling of wind and solar generators would be applicable for the inter-state and **intra-state** wind and solar energy generators whose scheduling is done by RLDCs and **SLDCs**."

- Similarly, the procedure outlined in the proposed framework in para No. 3.1, 3.2, 3.3 and 3.4, **intra-state capacity to be included** along with inter-state capacity and **SLDC** along with RLDCs.
- Similarly, in the proposed amendments in IEGS and DSM Regulations, **intra-state capacity to be included** along with inter-state capacity and **SLDC** along with RLDCs.
- Further, it is proposed to made applicable this framework to all the RE capacity and its subsequent capacity addition.
- Proposed framework is required to be implemented as early as possible.
- Present REC policy framed up to 2017 needs to be reviewed accordingly.
- Time frame of purchase of REC due to imbalance is to be clearly defined.

In view of the above, it is requested to incorporate above points in the proposed frame work.

Thanking you,
Yours Faithfully,



(B.B.Mehta)
Chief Engineer (LD)
SLDC, Vadodara.