

**TRANSMISSION CORPORATION OF ANDHRA PRADESH IMITED**

From  
The Chief Engineer / APSLDC,  
APTRANSCO, Vidyut Soudha,  
Vijayawada – 5200 008.

To  
→The Secretary  
Central Electricity Regulatory Commission  
3 rd & 4 th Floor, Chanderlok Building,  
36, Janpath, New Delhi- 110001  
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**Letter.No. CE/SE/DE/ADE3/F.DSM/D.No. 118 /2018, dated: 30.07.2018**

Sir,

Sub: APSLDC – Draft Central Electricity Regulatory Commission  
(Deviation Settlement Mechanism and related matters) (Fourth  
Amendment) Regulations, 2018-Inviting comments / suggestions-  
submission- Reg.

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I am directed to submit the enclosed comments /suggestions on  
Draft Central Electricity Regulatory Commission (Deviation Settlement  
Mechanism and related matters) (Fourth Amendment) Regulations, 2018  
for submitting before Hon'ble Central Electricity Regulatory Commission.

Encl:( As above)

Yours faithfully

  
Chief Engineer / APSLDC

copy to:

General Manager / SRLDC / 29, Race course road, Bangalore-560009

Member Secretary, SRPC, 29, Race course road, Bangalore-560009

APSLDC – Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) (Fourth Amendment) Regulations, 2018-Inviting comments / suggestions-submission

Determination of DSM charge at any instant becomes Complex in the draft proposal. Hence load dispatch operator assessing deviation charges becomes difficult. In real time load dispatch operations following economics in load dispatch are one of the prime responsibilities of SLDCs as per Electricity Act. This complexity in determination of DSM charges may be a real time constraint in discharging responsibility of SLDC. Hence DSM charges vector shall be made simple.

Point wise remarks

3.1. i) If the average clearing price is more like around five rupees (normally exchange rate for fifty days in a year) the slope of DSM will be less and price difference at frequency 50.00 and 49.85 will be less. Similarly 50.00Hz to 50.05Hz price vector slope is high. If the frequency is in the range of 50.02 to 50.03 the deviation price will be three rupees. This price is highly encouraging under drawl at frequency greater than 50Hz within IEGC stipulated limits for all the beneficiaries. Hence this may be taken a view.

ii) In compliance to IEGC clause 5.2(f) RGMO, if generators responded to any frequency dip, all the generators shall maintain 105% generation till the frequency reaches 50.05Hz. DSM amendment impact on this also may be considered.

4.4. Twenty percent penalty if total DSM energy in a day is beyond 3% of schedule in a day. Actually our schedule energy ranges from +30MU to -10MU with a peak load @9300MW. Being renewable rich state, as per IEGC + or - 250MW deviation is allowed. Certain days the schedule energy will be + or - 5 MU, then 3% deviation will become 150MWH for total day. Because of this clause provision given against renewable rich state will be curbed. **There should not be any error/difference between Real time SCADA data and SEMs data in any time block to avoid this penalty. In many time blocks it is more than three percent for last one year. Historical data can be verified in RLDCs. SCADA Vs SEM data error will cause this penalty. Hence this clause shall not be included. SCADA data should match with SEM data before including this clause. Comparative statement of SCADA Vs DSM data From 11.06.2018 to 24.06.2018 is enclosed for ready reference. In this**

**statements it is clear that error in data is more than allowable deviation three percent.**

4.19. Attracting additional surcharge 20% on daily DSM payable / receivable if once sign change is not happened in every seven time blocks **shall not be included. There should not be any error/difference between Real time SCADA data and SEMs data in any time block to avoid this penalty. In many time blocks it is more than three percent for last one year. Historical data can be verified in RLDCs. SCADA Vs SEM data error will cause this penalty. Hence this clause shall not be included. SCADA data should match with SEM data before including this clause. Comparative statement of SCADA Vs DSM data From 11.06.2018 to 24.06.2018 is enclosed for ready reference. Through SCADA data we cannot decide whether it is over drawl or under drawl due to error of more than three percent.**

AP system considered as control area is saddled with problems with VRE generation coupled with inaccuracy in forecast and scheduling of wind and solar generation. Many tools such as AGC(Automatic generation control),effective implementation of FGMO(free governor mode operation) etc., are required before any complex changes are introduced. Otherwise it will result in deviations in drawls and penalties thereof.

It is beyond doubt that system improvement is essential as policy makers are trying to squeeze the frequency band for grid security but it has to be thought of after adequate infrastructure is kept in place lest Discoms would be affected.

Therefore we pray Honble CERC to defer implementation of additional surcharge on sign change and penalties on DSM energy exceeding 3% in a day and Price vector for DSM mechanism be made simple.

Further AP state being VRE rich state, we request the Honble CERC to consider to allow 500MW deviation quantum instead of 250MW on underdrawl side now being permitted as Discoms will be benefited from this.

DAY WISE TOTAL SCHEDULE AND DRAWL AS PER SCADA AND DSM DATA

DATE & TIME	(MWH)			(MWH)			(MWH)			(%AGE)			DRAWL AS PER DSM DATA AVOID 20% PENALTY (OD OR UD IN MWH)	DATA ERROR MORE THAN 3%
	AS PER SCADA			AS PER DSM			ERROR BETWEEN DSM & SCADA (W.R.T. SCADA)			DIFFERENCE(%) (W.R.T. SCADA)				
DATE	CGS SHARE	CGS DRAWL	DEV	CGS SHARE (POST FACTO)	CGS DRAWL	DEV	CGS SHARE	CGS DRAWL	DEV	CGS SHARE	CGS DRAWL	DEV		
11-Jun-18	14829.66	13895.03	934.63	14826.54	12761.99	2064.55	-3.13	-1133.04	1129.92	-0.02%	-8.15%	120.89%		YES
12-Jun-18	15985.33	17584.74	-1599.41	16087.33	16384.84	-297.51	102.00	-1199.90	1301.90	0.64%	-6.82%	-81.40%		YES
13-Jun-18	23671.77	25301.97	-1630.20	23723.56	24008.44	-284.88	51.79	-1293.53	1345.32	0.22%	-5.11%	-82.52%		YES
14-Jun-18	41474.99	43840.79	-2365.80	41318.62	41845.89	-527.26	-156.36	-1994.90	1838.53	-0.38%	-4.55%	-77.71%		YES
15-Jun-18	44431.45	47636.25	-3204.80	44413.04	46039.85	-1626.82	-18.41	-1596.39	1577.98	-0.04%	-3.35%	-49.24%		YES
16-Jun-18	33873.65	36161.64	-2287.99	33879.25	34762.40	-883.15	5.60	-1399.24	1404.84	0.02%	-3.87%	-61.40%		YES
17-Jun-18	34374.44	36552.83	-2178.39	34408.90	34563.28	-154.39	34.46	-1989.55	2024.00	0.10%	-5.44%	-92.91%		YES
18-Jun-18	24678.23	25116.73	-1438.50	24681.51	23815.93	865.58	3.28	-2300.80	2304.08	0.01%	-8.81%	-160.17%		YES
19-Jun-18	26584.56	26707.86	-123.30	26627.86	23870.19	2757.67	43.30	-2837.67	2880.97	0.16%	-10.62%	-2336.60%		YES
20-Jun-18	31812.48	35419.68	-3607.21	31779.34	33448.88	-1669.54	-33.14	-1970.80	1937.67	-0.10%	-5.56%	-53.72%		YES
21-Jun-18	36192.41	35424.47	-232.06	36195.32	35864.76	330.56	2.91	-559.70	562.62	0.01%	-1.54%	-242.45%		NO
22-Jun-18	26587.37	29031.07	-1443.70	26467.80	27721.05	-1253.25	-119.57	-310.01	190.44	-0.45%	-1.11%	-13.19%		NO
23-Jun-18	32131.49	32666.36	-534.87	32041.32	32310.72	-269.40	-90.18	-355.64	265.47	-0.28%	-1.09%	-49.63%		NO
24-Jun-18	22173.44	22130.57	42.87	22114.46	21504.54	609.91	-58.98	-626.02	567.04	-0.27%	-2.83%	1322.70%		NO