

**Comments**

**on**

**Draft Central Electricity Regulatory Commission  
(Deviation Settlement Mechanism and related matters)  
(Fifth Amendment) Regulation 2019**

**By**

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# BACKGROUND

- **BARC, Tarapur gets Power Supply from TAPS 3&4 under Specific Allocation of 10 MW by Ministry of Power through Western Grid.**
- **It is a Regional Entity of Western Grid.**
- **When both units of TAPS 3&4 are running at full capacity, the schedule is 10 MW.**
- **When only one unit of TAPS 3&4 is running, schedule is 5 MW.**
- **At present, the maximum demand of BARC, Tarapur is approximately 6 MW.**
- **BARC, Tarapur is not having any Captive Power Plant.**
- **BARC, Tarapur is not allowed to schedule as per its own load requirement. The schedule is dependent only on generation of TAPS 3&4.**

# BACKGROUND (contd.)

- When both units of TAPS 3&4 are running, BARC, Tarapur is underdrawing.
- When any unit of TAPS 3&4 is not running, BARC, Tarapur is overdrawing.
- When there are outages of the feeders supplying power to BARC, Tarapur, the drawal by BARC, Tarapur will be zero irrespective of the schedule.

## **Case-1: Requirement of inclusion of BARC, Tarapur in exempted entity for adherence to Sign Violation Additional Charge in Fifth Amendment**

- In explanatory memorandum, the problem of BARC Tarapur is mentioned in point no. 2.4 (page no. 4) as “... *an entity with atomic energy in its portfolio should be exempted from DSM sign change requirement and charges.*”
- But, in the list of exempted entities in draft 5th amendment (point no 4.5, page no. 4 ) for adherence to sign change requirement, the case of BARC Tarapur has not been reflected.

- **The draft 5<sup>th</sup> amendment with +/- 10 MW allowable deviation will address the problem of BARC Tarapur at present. However, the power allocation of BARC, Tarapur from TAPS 3&4 will increase further in future.**
- **As BARC Tarapur is not allowed to schedule its requirement, therefore, in future, it will incur huge financial losses during feeder outages (in this situation, drawl will be 0 MW irrespective of the schedule) and during TAPS 3&4 unit(s) shut down.**

## **REQUEST-1**

**Hon'ble CERC is requested to grant exemption to BARC Tarapur from adherence to sign change requirement by including "Regional entities with specific allocation only from Nuclear Power plants" in the list of exempted entities in point no. 4.5, page 4 of draft Fifth Amendment.**

## **Case-2: Waiver of Sign Violation Additional Charges w.e.f. 01.01.2019 for BARC, Tarapur under Fourth Amendment**

**As a result of implementation of fourth amendment, BARC Tarapur is paying huge amount in the form of sign violation additional charges and we require to pay huge amounts till implementation of Fifth Amendment as we are not allowed to schedule as per our own load requirement.**

**Our monthly DSM charges due to sign violation additional charges is around Rs. 2.5 cr. (payable), which is more than the energy charges being paid to TAPS 3&4.**

## **REQUEST-2**

**Hon'ble CERC is requested to grant waiver to BARC, Tarapur for paying sign violation additional charges with effect from 01.01.2019**



