

Sr. No.	Proposed amendment	Comments
1.	4.5 (b) Amendment to Clause (10) of Regulation 7: From 01.04.2020, if the sustained deviation from schedule continues for 6 time blocks , the regional entity (buyer or seller), shall correct its position, by making the sign of its deviation from schedule changed or by remaining in the range of +/- 10 MW with reference to its schedule, at least once, latest by 7th time block.	The number of slots for sign change violation should remain at 12 time blocks even after 01.04.2020
2.	4.5 (a) Amendment to Clause (10) of Regulation 7: Up to 31.03.2020, if the sustained deviation from schedule continues for 12 time blocks, the regional entity (buyer or seller), shall correct its position by making the sign of its deviation from schedule changed or by remaining in the range of +/- 10 MW with reference to its schedule, at least once, latest by 13th time block Provided that each violation of the requirement under this clause shall attract an additional charge of 10% on the time block DSM payable / receivable as the case may be.	The proposed +/-10 MW margin for sign change should be increased atleast to 50MW to cancel out the impact of post-facto schedule.
3.	Suggestions	<p>The 2014 Principal Regulations may be revised to include all 4/5 amendments and fresh DSM regulations be circulated which may supersede all previous such notifications. It is very cumbersome to check relevant applicable clauses of the Principal Regulations in light of so many amendments.</p> <p>SEM-SCADA mismatch should be minimized to a value/percentage for every time slot instead of day as a whole equal to or less than the dead band proposed in clause 4.5 (b). There should be some benchmark (timeframe and block-wise accuracy level) for SLDC/RLDCs for restoring the correct data from the affected RTUs beyond which the losses/penalty burden should be borne by respective SLDC/RLDC's instead of Discoms, as it has been acclaimed in several meetings that their accuracy levels (of SEMs and RTUs) differ and some mismatch is there to remain.</p> <p>Sign violation should be based on Real Time/SCADA data and not SEM data, as all corrections are made based on data available on real-time basis.</p> <p>There should be provisions made in Regulations to exempt/ relaxation in DSM/ADSM charges during load crash scenarios due to unfavorable conditions (Extreme weather conditions, be continued as <i>force majeure</i>)</p> <p>If SCADA vs SEM data mismatch continues beyond a pre-defined period/ quantum, losses/penalty burden should be borne by respective SLDC/RLDC's instead of Discoms</p> <p>The draft DSM 5th Amendment should be implemented from 01.01.2019 instead of date of notification of 5th Amendment and accounts should be reconciled accordingly to reimburse the charges levied against sign change violations.</p> <p>The time line of 1.4.2020 should be extended till the time SEM data and SCADA data is fully matched and till that time all charges be based on SCADA/Real Time Data, the SEM data be made available to the Discoms on Real time basis.</p> <p>In the case of Haryana State, it has been observed that the mismatch between SEM and SCADA data sometimes comes down to a minimum, say 5 MW for a particular slot and then varies up to 100 MW in other slots of the same day and this</p>

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		pattern is totally random. SLDC Panipat authorities have informed that the mismatch cannot be eliminated altogether. Hence the changes being schedule from 01.04.2020 onwards should be held in abeyance till real time SEM real time data is made available to the Discoms.