

एन एच पी सी लिमिटेड

(भारत सरकार का उद्यम)

NHPC Limited

(A Government of India Enterprise)

फोन/Phone :	
दिनांक / Date: :09.2019	

संदर्भ सं./Ref. No. __

NH/Comml:/PT/2019//83

Central Electricity Regulatory Commission, 3rd & 4th Floor, Chanderlok Building, 36 - Janpath, New Delhi- 110 001

Sub:- Comments on "Proposed framework for Real-Time Market for Electricity" - Regg.

Ref:- Public notice RA-14026(11)/2/2018/CERC dated 06.08.2019

Sir.

In reference to above public notice dated 06.08.2019, the comments / suggestions of NHPC on Proposed framework for Real-Time Market for Electricity" is enclosed at Annexure-I for further necessary action.

Thanking You,

Yours Faithfully,

S.P. Rathour)

General Manager (Comml.)- PT

पंजीकृत कार्यालय : एन एच पी सी ऑफिस कॉम्पलैक्स, सैक्टर-33, फरीदाबाद - 121 003, हरियाणा

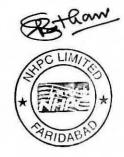
Regd. Office: NHPC Office Complex, Sector-33, Faridabad - 121 003, Haryana

CIN: L40101HR1975GOI032564; Website: www.nhpcindia.com E-mail: webmaster@nhpc.nic.in; EPABX No.: 0129-2588110/2588500

बिजली से संबंधित शिकायतों के लिए 1912 डायल करें। Dial 1912 for Complaints on Electricity

Comments on Clause/Provisions of Explanatory Memorandum

S.N.	Clause/Provisions of Explanatory Memorandum	Comments /Suggestion	
1.	Point no. 3.1.5 (Introduction of Gate Closure and Real time market) It is proposed that any revision in schedule made in odd time blocks shall become effective from 7th time block onwards, and any revision in schedule made in even time blocks shall become effective from 8th time block onwards, counting the time block in which the request for revision has been received to be the first one. In other words, once the real time market commences for any specific half-hour delivery period, the revision in schedule for that half hour (two time blocks) shall not be permitted.	Revision of Schedule in case of Forced Outage may be retained as 4th time block. Outage of unit/Plant leads to high DSM charges liability to Generators. Forced outage can occur at any time and Generator has to bear loss due to reasons beyond its control.	
2.	Point no. 3.1.10 (Intra-day segment of power exchange) Existing intra-day segment of power exchange would continue to clear the continuous transactions except for the time blocks for which the real-time market Operates.		
3.	Point No. 3.1.11 (Forced Outage) In case of forced outages the generator can participate in the Real Time Market and buy power for the beneficiary to honour its commitment	Suitable procedure to be provided for Generators who want to compensate the loss to its beneficiary /clients on account of Forced outage of its units in respect of Long Term/ Medium Term/Short Term schedule of Generator.	



Comments / Suggestion on Draft notification for 6th amendment of IEGC'2010

S.N.	Existing Provisions	Draft provisions	Comments /Suggestion
1	Clause (18) of Regulation 6.5 Revision of declared capability by the ISGS(s) having two part tariff with capacity charge and energy charge and requisition by beneficiary (ies) for the remaining period of the day shall also be permitted with advance notice. Revised schedules/ declared capability in such cases shall become effective from the 4th time block, counting the time block in which the request for revision has been received in RLDC to be first one.	Substituted Revision of declared capability by the ISGS(s) having two part tariff with capacity charge and energy charge and requisition by beneficiary (ies) for the remaining period of the day shall also be permitted with advance notice. Any revision in schedule made in odd time blocks shall become effective from 7th time block and any revision in schedule made in even time blocks shall become effective from 8th time block, counting the time block in which the request for revision has been received by the RLDCs to be the first one.	In Hydro Power Plants sudden change in inflow of water may require to increase or decrease the generation which can easily be done by 4th Time block as per existing clause. It is proposed to retain the existing clause for optimization of water inflow.
2	Sub clause (a) of clause 18 of Regulation 6.5 Notwithstanding anything contained in Regulations 6.5.18, in case of Forced outages of a unit, for those stations who have a two part tariff based on capacity charge and energy charge for long term and medium term contracts, the RLDC shall revise the schedule on the basis of revised declared capability. The revised declared capability and the revised schedules shall become effective from the fourth time block, counting the time block in which the revision is advised by ISGS to be first.	Substituted "In case of forced outages of a unit, for those stations who have a two part tariff based on capacity charge and energy charge for long term and medium term contracts, the RLDC shall revise the schedule on the basis of revised declared capability. The revised declared capability and the revised schedules shall become effective from the time block and in the manner as specified in Regulation 6.5.18."	Power Plants have to wait for 7th / 8th time blocks for getting it schedule revised in case of forced outage. Outage of unit/Plant leads to high DSM charges liability to Generators. Forced outage can occur at any time and Generator has to bear loss due to reasons beyond its control. It is proposed to retain the existing clause for optimization of water inflow.

3 Clause 19 of Regulation 6.5

Notwithstanding anything contained in Regulations 6.5.18, In case of forced outage of a unit of a generating station (having generating capacity of 100 MW or more) and selling power under Short Term bilateral transaction (excluding collective transactions through power exchange), the generator or electricity trader or any other agency selling power from the unit of the generating station shall immediately intimate the outage of the unit along with the requisition for revision of schedule and estimated time of restoration of the unit, to SLDC/RLDC, as the case may be. The schedule of beneficiaries, sellers and buyers of power from this generating unit shall be revised accordingly. The revised schedules shall become effective from the 4th time block. counting the time block in which the forced outage is declared to be first. The SLDC/RLDC as the case may be, shall inform the revised schedule to the seller and the buyer. The original schedule shall become effective from the estimated time of restoration of the unit, unit, However, the transmission charges as per original schedule shall continue to be paid for two days.

Substituted

In case of forced outage of a unit of a generating station (having generating capacity of 100 MW or more) and selling power under Short Term bilateral transaction (excluding collective transactions through power exchange), the generator or electricity trader or any other agency selling power from the unit of the generating station shall immediately intimate the outage of the unit along with the requisition for revision of schedule and estimated time of restoration of the unit, to SLDC/RLDC, as the case may be. The schedule of beneficiaries, sellers and buyers of power from this generating unit shall be revised accordingly. The revised schedules shall become effective from the time block and in the manner as specified in Regulation 6.5.18. The SLDC/RLDC as the case may be, shall inform the revised schedule to the seller and the buyer. The original schedule shall become effective from the estimated time of restoration of the unit. However, the transmission charges as per original schedule shall continue to be paid for two days.

Power Plants have to wait for 7th / 8th time blocks for getting it schedule revised in case of forced outage. Outage of unit/Plant leads to high DSM charges liability to Generators. Forced outage can occur at any time and Generator has to bear loss due to reasons beyond its control.

It is proposed to retain the existing clause for optimization of water inflow.



Provided that the schedule of the buyers and sellers shall be revised after forced outage of a unit, only if the source of power for a particular transaction has clearly been indicated during short-term open access application and the said unit of that generating station goes under forced outage.

Provided also that the provisions of these sub regulations in respect of revision of schedule by electricity traders and any other agency (except the generating station) shall be operative with effect from 1st July2012.

Provided that the schedule of the buyers and sellers shall be revised after forced outage of a unit, only if the source of power for a particular transaction has clearly been indicated during short-term open access application and the said unit of that generating station goes under forced outage.

