

Statkraft Markets Private Limited CIN: U51909DL2011PTC228692 Registered and Corporate office address : 401, 4th Floor, D-1, Salcon Rasvilas Building, Saket District Centre, New Delhi-110 017. Office: +91 11 6616 1200 Telefax: +91 11 6616 1299 www.statkraft.com, www.statkraft.in

The Secretary Hon'ble Central Electricity Regulatory Commission 3rd & 4th Floor, Chanderlok Building, 36, Janpath, New Delhi -110001

04.09.2019

Dear Sir,

Sub: Comments/ suggestions/ objections on the Proposed Framework for Real-Time Market for Electricity dated 06.08.2019 issued by the Central Electricity Regulatory Commission

Ref:

- Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code)
 (Sixth Amendment) Regulations, 2019 dated 06.09.2019 issued by the Central Electricity Regulatory Commission,
- (2) Draft Central Electricity Regulatory Commission (Power Market) (Second Amendment) Regulations, 2019 dated 06.09.2019 issued by the Central Electricity Regulatory Commission,
- (3) Draft Central Electricity Regulatory Commission (Open Access in inter-State Transmission) (Sixth Amendment) Regulations, 2019 dated 06.09.2019,
- (4) Explanatory Memorandum (Real-Time Markets for Electricity); and
- Public notice dated 06.08.2019 given under Section 178(3) of the Electricity Act,
 2003 read with Rule 3 of the Electricity (Procedure for Previous Publication)
 Rules, 2005 inviting comments/ suggestions/ objections from the stakeholders and
 interested persons on the aforesaid Draft Regulations.

We would like to thank the Hon'ble Commission for providing us the opportunity to provide our comments/ suggestions/ objections on the proposed framework for Real-Time Market for Electricity.

At the outset, Statkraft appreciates the draft regulations which aim to re-design the intraday market mechanisms by the way of creating a Market platform for trade of energy closer to the delivery of power in real time.

We request the Hon'ble commission to consider the following comments/inputs as a part of finalizing the proposed framework:



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Clause no. 3.1.11 of Explanatory Memorandum
 "3.1.11 All generators connected to the grid will be able to participate in the Real
 Time Market. In case of forced outages the generator can participate in the Real
 Time Market and buy power for the beneficiary to honor its commitment."

- Clarification sought on how the generators in a forced outage scenario will be able to buy power for the beneficiary. Which regulatory provision enables the generators to execute this.
- Clarifications sought on the No Objection Certificate (NoC) process and approvals given the compressed timelines for participating in this market.
- Wind and Solar generators should also be allowed to buy in the Real Time Market in case actual generation is not as per the forecasted generation and not just restricted to forced outage situations. For better optimization, RE generation aggregated at the pooling substation level should also be allowed to participate on this market.
- 2. Clarification sought on whether trade results given by power exchanges will be assumed as the final schedule or whether the intra-state entity has to wait for the same to be implemented at RLDCs/SLDCs portal.
- 3. We also propose that the STOA Charges including the application fees should be balanced commensurate to the size and liquidity of the market and to ensure effective development of this market.

Thanking You.

Yours Sincerely,

Arneet Kaur Commercial and Regulatory Analyst Statkraft Markets Private Limited

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