

## MAHARASHTRA STATE POWER GENERATION CO. LTD.

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Regulatory & Commercial Dept  
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Ref No: RCD21/1/LT00557

Date: 21.10.2021

To,  
Hon'ble Secretary,  
Central Electricity Regulatory Commission,  
3 rd & 4 th Floor, Chanderlok Building,  
36, Janpath, New Delhi -110 001.

Subject: Submission of comments / suggestions from Maharashtra State Power Generation Company Ltd. Mumbai on the Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2021.

Ref: 1) Notice dated 07.09.2021.

2) Public Notice dtd. 08.10.2021 regarding extension of date for the submission of the comments. (The revised date of submission of the comment is 22.10.2021).

Respected Sir,

Hon'ble Commission has invited comments and suggestions on the Draft DSM regulations, 2021, vide Public notice under reference above.

Following are the comments/ suggestion from MSPGCL in the subject matter.

1. Most prominent change in the proposed DSM Regulations is departure from Frequency based DSM charge methodology. **So once the DSM rate is de-linked from frequency, there is no special incentive to generators for over-injection / under-injection carried out to support frequency stabilization.**
2. As the market for Ancillary Services is not yet developed and maturity of such market will happen only after the market is fully developed, so it is felt that it is too early to shift away from the prevailing frequency based DSM, which has contributed a lot in stabilizing the grid frequency.
3. Also by linking the DSM rate to ACP rate of Real Time Market segment of all power exchange; it is in a way insisting all generating companies to follow the trend in real time market of all power exchange also. Under the prevailing DSM, the ACP for the Day Ahead Market for the (n-2) day is the base rate. With the DSM rate also being linked to Real Time Market of all power exchange, it will be very essential for all generating companies to monitor the Real Time Market, assess the applicable DSM rate and take the decisions related to actual generation on the basis of such rates. This will necessitate much faster decision making using

better IT-enabled services. Development of such services will take immediate investment & development time.

4. The New DSM regulation 2021 is proposing 2% band for deviations beyond which DSM rate will be at 10% of normal DSM rate for over-injection and 110% of normal DSM rate for under-injection. From the present volume limit of 12%, the tightening of the band is felt to be too stringent in a single go. Justifications submitted are,

(1) Presently the normal range of deviations for conventional (coal fired) generating units is up to 5% of schedule. Especially for multiple sources domestic coal based generating units, there are difficulties in real time assessment of deliverable capacity as exact GCV of coal being fired is not determinable online and thus variations in coal GCV will inadvertently lead to fluctuations in actual generation.

The proposed 2% margin is not only just too stringent and but also put domestic coal based generating units at big disadvantage as compared to imported coal based plant or plant with captive mine or single source mine. For the multi-coal source based generating units, there are difficulties in real time assessment of deliverable capacity as exact GCV of coal being fired is not determinable online. MSPGCL receives the Coal from four coal companies as per FSA, i.e. Western Coalfield Limited (WCL), South Eastern Coalfields Limited (SECL), Mahanadi Coalfields Limited (MCL) & Singareni Collieries Company Limited (SCCL). These coal companies have various coal mines from where MSPGCL receives the coal. (Sheet indicating sources with notified grade is attached herewith). It is worth to note that there is large variation in the notified grades of undertaken coal mines ranging from G7 to G15. Moreover each mine has variation in coal quality. Thus variations in coal quality leads to large fluctuations in actual generation.

(2) **Hon'ble CERC has acknowledged that the under-injection deviations are inadvertent with FGMO/RGMO influence, there has to be relaxation in the DSM charges for such inadvertent deviations.** The deviations on account of FGMO / RGMO influence are unavoidable and are on either side i.e. there will be over-injection due to FGMO/RGMO influence when the frequency is going down and there will be under-injection when frequency is rising.

**So the band of 2% is too stringent to operate for generating units. There is need for step-wise reduction in the band.**

5. **As deviations due to FGMO/RGMO influence are inadvertent, the proposal for normal DSM charges for under-injection within 2% deviation needs to be reconsidered. Also, similar to consideration given for no DSM charges for over-injection within 2% margin, there should be no DSM charges levied on under-injection deviations within 2% margin.**
6. Thus it is suggested that there should be slabs for deviation. Also the DSM charges should increase in stepped manner instead of applying 110% of DSM charge for under-injection deviations above 2%, as proposed presently. The slabs for deviation and proportional DSM charges may please be as tabulated below.



Deviation %	Deviation by way of under injection	Deviation by way of over injection
Upto 2%	Zero	Zero
2% to 5%	100%	5%
5% to 10%	105%	8%
Above 10%	110%	10%

7. Gas Thermal Power Station with APM gas: - Mahagenco has Uran Gas Thermal Power Station, where the generation is purely based on real time gas availability. The Gas is supplied by ONGC to Uran GTPS and other consumer by means of Gas network which is controlled & maintained by ONGC/GAIL. In case of any technical issue which is regular phenomenon in the supply as well as in Gas Network, ONGC adjusts/reduces the supply and this affects all connected consumers including Uran GTPS. This results in deviation in supplied energy with respect to scheduled energy. Further, in day ahead market, DSM mandate the generator to declare its capacity by 10:00 Hrs, however Gas supply agreement with ONGC, allows ONGC to provide supply schedule declaration to consumer by 22:00 Hrs of previous day. The GTPS, being lowest among MoD stack & being a Administered Price Mechanism (APM) cost gas user, will be at great disadvantage in DSM regime due to input (i.e. gas), supply variations which are beyond control of generator.

Thus in effect, Generator has to face following problems:

- i. *Real time uncertainty in constant supply of gas quantity in case of issues at ONGC supply end & distribution network.*
- ii. *Non availability of DNQ by 1000 hours which is essential input for declaration of capacity under DSM mechanism. (DNQ Daily Nominated Quantity)*


There has to be some mechanism to give consideration to such low cost but externally dependent power stations.

8. The proposed DSM rates for Wind and Solar generators are by and large rational.

MSPGCL submit & requests to consider the above comments while finalizing the proposed DSM Regulations, 2021.

Thanking you.

Yours faithfully,

  
 Chief Engineer (RCD),  
 MSPGCL, Mumbai

Copy s.w.r.to

Hon'ble Secretary,

Maharashtra State Electricity Regulatory Commission,

COLLIERY / SIDING WISE DECLARED GCV / GRADE OF WCL COAL					
SR.NO	COLLIERY/SIDING	GRADE REDECLARATION ON DT.01.04.2020 to 31.03.2021		GRADE REDECLARATION ON DT.01.04.2021 to 31.03.2022	
		GCV AS PER NOTIFICATION	GCV GR	GCV AS PER NOTIFICATION	GCV GR
	<b>BG</b>				
1	B.G.	3701-4000	G12	3701-4000	G12
2	BARKUI OCM	3701-4000	G12	4001-4300	G11
3	MAHADEOPURI UG	3701-4000	G12	4001-4300	G11
4	NEW SETHIA OC	3701-4000	G12	3701-4000	G12
5	SHIVPURI MINES OC PATCHES	3701-4000	G12	3701-4000	G12
6	URDHAN OC	3701-4000	G12	3701-4000	G12
7	B.G. A				
8	B.G. B				
	<b>EDC</b>				
9	MATHANI UG	4601-4900	G9	4601-4900	G9
10	NEHARI UG	4601-4900	G9	4601-4900	G9
11	VISHNUPURI UG-I	4601-4900	G9	4601-4900	G9
12	VISHNUPURI UG-II	4601-4900	G9	4601-4900	G9
13	E.D.C	4601-4900	G9	4601-4900	G9
14	E.D.C	4601-4900	G9	4601-4900	G9
15	Ghuggus Ramp A				
16	Ghuggus Ramp B				
	<b>BALLARPUR AREA</b>				
17	Ballarpur BOCM	4001-4300	G11	4001-4300	G11
18	Ballarpur GOCM	4301-4600	G10	4301-4600	G10
19	Ballarpur POUNI II EXP OC	4001-4300	G11	4001-4300	G11
20	Ballarpur POUNI	4001-4300	G11	4001-4300	G11
21	Ballarpur BCUG	5201-5500	G7	5201-5500	G7
22	Pen Ganga (Ballarpur)	4301-4600	G10	4301-4600	G10
23	POUNI OCM	4001-4300	G11	4001-4300	G11
24	Pimpalgaon				
	<b>New Sasti</b>				
25	GOURI DEEP OC				
26	GOURI EXP (A) OC	4301-4600	G10	4301-4600	G10
27	SASTI /POUNI	4001-4300	G11	4001-4300	G11
28	SASTI EXP OC	4001-4300	G11	4001-4300	G11
29	NSS SASTI UG	4901-5200	G8	4901-5200	G8
	<b>Umrer AREA</b>				
30	Umrer	4601-4900	G9	4601-4900	G9
31	Umrer MKD-I	4001-4300	G11	4001-4300	G11
32	Umrer MKD-III	4301-4600	G10	4001-4300	G11
33	UMRER GOKUL	4001-4300	G11	4001-4300	G11
34	UMRER MURPAR	4601-4900	G9	4601-4900	G9
	<b>Wani GGS A</b>				
35	GGS RAMP A KOLGAON	4301-4600	G10	4301-4600	G10
36	GGS RAMP A Mungoli (Wani North)	3401-3700	G13	3401-3700	G13
37	GGS RAM A NILJAI OCM (TOP SEC)	3401-3700	G13	3401-3700	G13
38	NILJAI SOUTH OCM (TOP SEC)	3401-3700	G13	3401-3700	G13
	<b>Wani GGS B</b>				
39	GGS RAMP B Mungoli OCM (BOT SEC)	4301-4600	G10	4301-4600	G10
40	GGS RAMP B NILJAI OCM (BOT SEC)	4301-4600	G10	4301-4600	G10
41	GGS RAMP B NILJAI SOUTH OCM (BOT SEC)	4301-4600	G10	4301-4600	G10
42	Nandan Washery	4601-4900	G9	4601-4900	G9
43	New Ghuggus				
44	NAIGAON OCM				
45	NAIGAON				
	<b>MAJRI CHARGAON</b>				
46	CHARGAON TELWASHA				
47	Chargaon				

48	New Majri (C/P) UG TO OC	4115	G11	4115	G11
49	NEW MAJRI OC	4882	G9	4882	G9
<b>CHANDRAPUR AREA</b>					
50	BHATADI	4504	G10	4504	G10
51	Durgapur (C/P)	4001-4300	G11	4001-4300	G11
52	Padmapur	4001-4300	G11	4001-4300	G11
53	CRC (POC)	4601-4900	G9	4601-4900	G9
54	CRC DRC	4301-4600	G10	4301-4600	G10
55	CRC MKC	4601-4900	G9	4601-4900	G9
56	HLC				
57	HLC POC	4601-4900	G9	4601-4900	G9
58	HLC POC+NI	4601-4900	G9	4601-4900	G9
59	HLC(HLOC)	4001-4300	G11	4001-4300	G11
60	HLC MANA	4601-4900	G9	4601-4900	G9
<b>NAGPUR AREA</b>					
61	KAMPTEE UG	3701-4000	G12	3701-4000	G12
62	GONDEGAON	3701-4000	G12	3701-4000	G12
63	INDER UG	3701-4000	G12	3701-4000	G12
64	SINGORI	4001-4300	G11	4001-4300	G11
65	BHANGAON	3701-4000	G12	3701-4000	G12
66	Saoner	4301-4600	G10	4301-4600	G10
67	Silewara	4601-4900	G9	4601-4900	G9
68	Silewara (AB INCLINE)				
69	Adasa (C/P)	4601-4900	G9	4601-4900	G9
70	Patansaongi	4601-4900	G9	4601-4900	G9
<b>HIRDAGARTH</b>					
71	GHORAWARI (21/22) JHARNA	6401-6700	G7	6401-6700	G7
72	GHORAWARI QUARRY	3401-3700	G13	3401-3700	G13
73	MOHAN QUARRY	3701-4000	G12	3701-4000	G12
74	Hirdagarh				
75	Hirdagarh				
<b>PALACHORI</b>					
76	MOHAN 9/10 (MOURI INCLINE)	3701-4000	G12	3701-4000	G12
77	MOHAN QUARRY	3701-4000	G12	3701-4000	G12
78	Palachori	3701-4000	G12	3701-4000	G12
<b>WANI NORTH</b>					
79	JUNAD (C/P) (Wani North)	4724	G9		
80	JUNA KUNADA OCM				
81	Kumbharkhani (Wani North)				
82	Kolarpipri (Wani North)	4301-4600	G10		
83	UKANI	4835	G9		
84	GHONSA OCP	4835	G9		

COLLIERY / SIDING WISE DECLARED GCV GRADE OF SECL COAL							
SR.NO	COLLIERY/SIDING	GCV AS PER NOTIFICATION BEFORE APRIL.17	GCV GR.	GRADE REDECLARATION ON DT.01.04.2020 to 31.03.2021		GRADE REDECLARATION ON DT.01.04.2021 to 31.03.2022	
				GCV AS PER NOTIFICATION	GCV GR	GCV AS PER NOTIFICATION	GCV GR
1	JUNADI-I	4001-4300	G11	4001-4300	G11	4001-4300	G11
2	ROBARTSON	3701-400	G13	3101-3400	G14	3101-3400	G14
	ROBARTSON (CHAL OC) SEAM LOCAL	3701-400	G13	2801-3100	G15	2801-3100	G15
	ROBARTSON			3401-3700	G12	3401-3700	G12
3	SURAKACHAR	5801-6100	G5	5201-5500	G7	5201-5500	G7
4	DIPKA	4001-4300	G11	4001-4300	G11	4001-4300	G11
5	KUSMUNDA-I	4001-4300	G11	4001-4300	G11	4001-4300	G11
6	CHIRIMIRI	5801-6100	G 5	4601-4900	G9	4601-4900	G9
7	DUMANIHILL	5801-6100	G 5	4601-4900	G9	4601-4900	G9
8	NCPH	5801-6100	G 5	5201-5500	G7	5201-5500	G7
9	RAJNAGAR R.O.	6400-6700	G3	5501-5800	G6	5501-5800	G6
10	NEW RAJNAGAR	5801-6100	G5	4901-5200	G8	4901-5200	G8
11	BIJURI	6101-6400	G4	5201-5500	G7	5201-5500	G7
13	JAINAGAR	6101-6400	G4				
14	JAINAGAR	5201-5500	G7				
15	BHATGAON (MOHAN OC ) LOWER	4601-4900	G9	4301-4600	G10	4301-4600	G10
16	BHATGAON	6101-6400	G4	5201-5500	G7	4901-5200	G8
17	BHATGAON WHARF WALL 1					3401-3700	G13
18	BHATGAON WHARF WALL 2					5201-5500	G7
19	KATORA	5801-6100	G5	4901-5200	G8	4901-5200	G8
20	GOVINDA	5801-6100	G5	4001-4300	G11	4001-4300	G11
21	BURHAR A	5501-5800	G6	5501-5800	G6	5501-5800	G6
22	BURHAR	5201-5500	G7	4901-5200	G8	4901-5200	G8
23	KUMDA	5501-5800	G6	5501-5800	G6	5501-5800	G6
24	CHURCHA	6400-6700	G3	6400-6700	G3	6400-6700	G3
25	Gevra	4001-4300	G11	4001-4300	G11	4001-4300	G11
26	BISRAMPUR WHARF WALL (A)	6101-6400	G4	4601-4900	G9	4601-4900	G9
27	BISRAMPUR WHARF WALL (B)			4301-4600	G10	4301-4600	G10
28	NOWROZABAD-I	5501-5800	G6	4301-4600	G10	4301-4600	G10
29	NOWROZABAD-II	5201-5500	G7	4901-5200	G8	4901-5200	G8
30	MANIKPUR			3401-3700	G13	3401-3700	G13
31	Korichhapar-III			2800-3100	G15	2800-3100	G15
32	Korichhapar-I			4601-4900	G9	4601-4900	G9

Note : Korea Rewa Field collieries Chirimiri, Bijuri,

**COLLIERY / SIDING WISE DECLARED GCV GRADE OF MCL COAL**

SR.NO	COLLIERY/SIDING	GRADE REDECLARATION ON DT.01.04.2020 to 31.03.2021		GRADE REDECLARATION ON DT.01.04.2021 to 31.03.2022	
		GCV AS PER NOTIFICATION	GCV GR	GCV AS PER NOTIFICATION	GCV GR
1	LAJKURA-I	3101-3400	G14	3101-3400	G14
2	LAJKURA-II	3101-3400	G14	3101-3400	G14
3	LAJKURA-III	3101-3400	G14	3101-3400	G14
4	Y-CURVE IV	3101-3400	G14	3101-3400	G14
5	Y-CURVE V	3101-3400	G14	3101-3400	G14
6	BPS	3101-3400	G14	3101-3400	G14
7	BOCM-I	3101-3400	G14	3101-3400	G14
8	BOCM-II	3101-3400	G14	3101-3400	G14
9	BOCM-III	3101-3400	G14	3101-3400	G14
10	BOCM-VI	3101-3400	G14	3101-3400	G14
11	BOCM-VII	3101-3400	G14	3101-3400	G14
13	KANIKA	3401-3700	G13	3101-3400	G14
14	ORIENT	3701-4000	G12	3701-4000	G12
15	KANIHA	2801-3100	G15	3101-3400	G14
16	BBSRI/(ANANTA)	3701-4000	G12	3701-4000	G12
17	SARDEGA	3401-3700	G13	3401-3700	G13

COLLIERY / SIDING WISE DECLARED GCV GRADE OF SCCL COAL					
SR.NO	COLLIERY/SIDING	GRADE REDECLARATION ON DT.01.04.2020 to 31.03.2021		GRADE REDECLARATION ON DT.01.04.2021 to 31.03.2022	
		GCV AS PER NOTIFICATION	GCV GR	GCV AS PER NOTIFICATION	GCV GR
1	ASIFABAD				
2	RECHNI	3401-3700	G13	4001-4300	G11
3	RECHNI (DORLI)				
4	GODAVARIKHANI(GDK) 9 (CHO)	3401-3700	G13	3401-3700	G13
	GODAVARIKHANI(GDK) 6 (CHO)			4001-4300	G11
5	GODAVARIKHANI (GDK) 1			4901-5200	G8
6	GODAVARIKHANI (GDK) 10A				
7	RAMKRISHNAPURAM (RKP)	4301-4600	G10	4301-4600	G10
	RAMKRISHNAPURAM (RKP)			4001-4300	G11
	RAMKRISHNAPURAM (RKP)			3701-4000	G12
8	RUDRAMPUR CHP			3401-3700	G13
9	YELANDU-1 CHP (SYI)	-	-	3401-3700	G13
10	YELLANDU	2801-3100	G15	2801-3100	G15
11	SRIRAMPUR OC (SRP)	4901-5200 / 4301-4600	G8/G10		
12	SHIRAMPUR CHP	4001-4300	G11	4001-4300	G11
	SHIRAMPUR CHP			4601-4900	G9
	SHIRAMPUR CHP			4301-4600	G10
13	KHAIRAGUDA OCP	4301-4600	G10		
14	GDK-6	3401-3700	G13	3401-3700	G13
15	OCP-III			4001-4300	G11
16	OCP-III			3401-3700	G13
17	REBBANA			4301-4600	G10
18	GOLETI CHP	4001-4300	G11		
19	MANUGURU	-	-	2801-3100/2500-2800	G15/G16
	MANUGURU-1			4601-4900	G9
	MANUGURU-4			4301-4600/3401-3700	G10/G13
20	TADAKALAPUDI	3401-3700	G13	3401-3700	G13