



# NABHA POWER LIMITED

**NPL**  
Nabha Power Limited

P.O. Box No -28, Near Nalash, Rajpura-140401, Punjab  
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Letter.No.: NPL/CD/PM/CERC/SCRC/211008/2

08.10.2021

**Secretary – CERC,  
Chanderlok Building,  
36, Janpath,  
New Delhi- 110001**

**Sub: Comments on Draft Central Electricity Regulatory Commission  
(Deviation Settlement Mechanism and Related Matters) Regulations,  
2021.**

**Ref: Public notice no. L-1/260/2021/CERC dated 07.09.2021**

Dear Sir,

In reference to your notice above, please find enclosed comments on the same on behalf of Nabha Power Limited (NPL), having 2 X 700 MW Coal fired Thermal Power Plant at Rajpura, Punjab.

This is for your kind consideration, please.

Thanking you,

**For Nabha Power Limited**

**(Authorized Signatory)**

**Encl: As above**

**Comments on Draft Central Electricity Regulatory Commission  
(Deviation Settlement Mechanism and Related Matters) Regulations, 2021**

| Clause No                              | Draft Provision                                                                                                                                                                                                          | NPL Remark/Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Short title and commencement</b> | <p>(1) ....</p> <p>(2) These regulations shall come into force on such date as may be notified by the Commission separately.</p>                                                                                         | <p>These regulations seek to ensure adherence to schedule of drawal and injection of electricity in the interest of security and stability of the grid. The calculation of charges for deviation has been devised accordingly.</p> <p>But before these regulations are notified, Commission must mandate installation of GPS based Energy Meters for energy accounting by all Load Despatch Centres to ensure accurate computation of deviation and eliminate the prevalent meter drift error.</p>                                                                                                                                                                         |
| <b>3. Charges for Deviation</b>        | <p>(1) ....<br/>Deviation by way of over injection</p> <p>(i) Zero up to 2% Deviation-general seller (in %);</p> <p>(ii) @ 10% of the normal rate of charges for deviation beyond 2% Deviation-general seller (in %)</p> | <p>Generators also contribute towards grid stability through RGMO.</p> <p>While the generators shall make efforts to adhere to the schedule but during an upward RGMO event, the generator may automatically end up over injecting.</p> <p>It would be wrong to deprive the generator of any compensation in such events, since the generator has supported the grid stability through over injection.</p> <p>To take care of above event and other such incidents (like forced outages etc.), a margin of 1% may be provided for both under-injection/ over-injection cases, for which generator would be charged/ compensated at actual energy charge for the month.</p> |