Comments/Suggestion on draft CERC DSM Regulations,2021

Reference draft regulation	Proposed provision	Suggested provision	Rationale
3 (t), 8(2)	Renewable Rich State' or 'RE-rich State' means a State whose combined installed capacity of solar and wind power projects under the control area of the State is 1000 MW or more;	Renewable Rich Buyer or RErich Buyer' means a Buyer whose total schedule includes solar and wind power of 1000 MW or more	Apparently the proposed draft aims to cover up the uncertainties and variation in schedule of RE (solar and wind) power by increasing the volume limit from 150 MW to 250 MW (draft reg 8(2)). However by using term RE-rich State the intended objective may not be realised as merely by having commissioned solar and wind capacity in a State, it can't be construed that the total capacity have been tied up by that State and being Scheduled by it. This can further be explained by referring the prevailing scenario where to comply with RPO target, States having less solar and wind potential have tied up and scheduling power from solar and wind generators located in States having high solar and wind potential. Obviously in such cases States who does not have large installed capacity of solar and wind are facing challenge to mitigate the effect of uncertainties and frequent changes in schedule associated with solar and wind powers. Therefore, in view of the above and to meet the intended objective as well as to promote the transaction of solar and wind based power it is suggested that instead of increasing volume limit of RE rich State, volume limit of RE rich Buyer may be increased to 250 MW. Accordingly the term appearing in regulation 8(2) may be changed.