



# Penna Cement Industries Limited

PCIL/TRANSCO/018/2021-22

08<sup>th</sup> October, 2021.

To  
The Secretary,  
Central Electricity Regulatory Commission,  
New Delhi.  
Email: [secy@cercindia.gov.in](mailto:secy@cercindia.gov.in)  
[Rashmi@cercindia.gov.in](mailto:Rashmi@cercindia.gov.in)

Sir,

**Sub:** Penna Cement Industries Limited, Captive Power Plant – Comments/Suggestions/objections on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2021 – Submission - Reg.

Ref: Your Public Notice No. L-1/260/2021/CERC, Dated: 07<sup>th</sup> September, 2021.

With reference to above cited notice dated 07-09-2021, please find below our objections/comments/suggestions:

Clause No's as per Draft Regulation	Description as per Draft Regulation	Penna Cement Comments/Suggestions/Objections
Regulation 7 of the Regulations,2021: Normal Rate of Charges for Deviations	"Provided that for a period of one year from the date of effect of these regulations or such further period as may be notified by the Commission, the normal rate of charges for deviation for a time block shall be equal to the highest of [the weighted average ACP of the Day Ahead Market segments of all the Power Exchanges; or the weighted average ACP of the Real Time Market segments of all the Power Exchanges; or the Weighted Average Ancillary Service Charge of all the regions] for that time block"	We request to Establish the Charges for deviation mechanism before implementing the DSM regulations 2021. And request to not to consider the highest price among ACP power exchanges (DAM or RTM) or ancillary service charge of all regions.
Regulation 8 of the Regulations,2021 : (1) Charges for Deviation (For general seller other than an RoR generating station or a generating station based on municipal solid waste)	<p><b><u>Deviation by way of Over injection</u></b></p> <p>(i) Zero up to 2% Deviation – general seller (ii) @ 10% of the normal rate of charges for deviation beyond 2% Deviation-general seller (in %)</p> <p><b><u>Deviation by way of Under injection</u></b></p> <p>(i) @ normal rate of charges for deviation up to 2% Deviation – general seller</p> <p>(ii) @ 110% of the normal rate of charges for deviation beyond 2% Deviation-general seller (in %)</p>	<p><b><u>Deviation by way of Over injection</u></b></p> <p>We request to consider these charges are payable to Generator or seller in case of over injection.</p> <p><b><u>Deviation by way of Under injection</u></b></p> <p>Request to consider normal rate of charges deviation upto 10% for below 50 MW schedule.</p> <p>We request to consider @ 100% of the normal rate of charges for deviation beyond 10% (for below 50 MW schedule)</p>

<p>Regulation 8 of the Regulations,2021 :</p> <p>(2) Charges for Deviation (Buyer with schedule upto 400MW)</p>	<p><b><u>Deviation by way of Over draw!</u></b></p> <p>(i) @ normal rate of charges for deviation up to 12% Deviation – buyer</p> <p>(ii) @ 110% of the normal rate of charges for deviation beyond the above limit</p>	<p><b><u>Deviation by way of Over draw!</u></b></p> <p>We request to modify or add schedule upto 50 MW read as below:</p> <p>(i) @ normal rate of charges for deviation up to 100% Deviation – buyer</p>
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Please consider our above comments/objections before commencing the DSM regulation 2021.

Expecting a favourable action from your end.

Thanking you,

Yours faithfully,  
for PENNA CEMENT INDUSTRIES LIMITED



V. Manikanth  
General Manager - Projects