



**RP - Sanjiv Goenka
Group**

Growing Legacies



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RPTCL/2021-22/CERC/069

07th Oct, 2021

The Secretary,

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

Sub: - Comments/Suggestions on “Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2021”.

Dear Sir,

This has reference to the public notice No. L-1/260/2021/CERC dated 07th September, 2021 for seeking comments or suggestions on “**Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2021**” issued by Hon’ble Central Electricity Regulatory Commission.

Accordingly, in this regard, kindly find our observations/comments/suggestions enclosed as Annexure to this letter for your kind consideration.

Thanking You.

Yours faithfully,

Venkatesh Baggam
Deputy Manager

Enclosed: As stated above

RPG Power Trading Co.Ltd Comments/Suggestions

On Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2021.

Sr.no	Clause no	Clause refers to	Comments/Suggestions
1	Regulation 9(7)	In case of deficit in the Deviation and Ancillary Service Pool Account of a region, surplus amount available in the Deviation and Ancillary Service Pool Accounts of other regions shall be used for settlement of payment under clause (6) of this Regulation: Provided that in case the surplus amount in the Deviation and Ancillary Service Pool Accounts of all other regions is not sufficient to meet such deficit, the balance amount shall be recovered through the RLDC Fees and Charges.	Hon'ble commission may also like to kindly mention about any plan for utilization of the surplus funds in case such funds are available in the Deviation and Ancillary Service Pool Account even after settlement of payments.
2	Regulation 8(1)	Charges for deviation in a time block by a seller shall be payable by such seller	Under Section 61 (h) of the Electricity Act to promote co-generation and generation from renewable sources of electricity. It is requested that Hon'ble commission may kindly like to examine whether a separate category of DSM charges is also required for Cogeneration plants like that proposed for MSW, ROR plants and Wind/Solar Plants due to their variable nature for settlement in the Deviation and Ancillary account.
3	Regulation 8(4)	The charges for inter-regional deviation and for deviation in respect of cross-border transactions, caused by way of over-drawal or under-injection shall be payable at the normal rate of charges for deviation	Some of the Generators/States have their schedules both within India and cross border transactions. For better clarity, it requested to kindly mention that the deviation charges as per regulation 8(1) for the transactions within India will also be applicable for transactions mentioned in regulation 8(4) for cross-border transactions. .

