

# The West Bengal Power Development Corporation Limited (WBPDC)

## Comments on CERC Draft DSM Regulations, 2021

REGULATION	PROPOSED AMENDMENT	COMMENTS AND SUGGESTIONS
<p>Draft Regulation Clause: 8.(1)</p>	<p><b><u>Charges for deviation payable to Deviation and Ancillary Service Pool Account</u></b></p> <p><b>Deviation by way of over injection:</b> (i) Zero up to 2% Deviation-general seller (in %); (ii) @ 10% of the normal rate of charges for deviation beyond 2% Deviation-general seller (in %).</p> <p><b>Deviation by way of under injection:</b> (i) @ normal rate of charges for deviation up to 2% Deviation-general seller (in %); (ii) @ 110% of the normal rate of charges for deviation beyond 2% Deviation-general seller (in%).</p>	<p>We request the Hon'ble Commission to consider the following prayer and make necessary relaxation in the Regulation:</p> <p>When machine is in RGMO/FGMO mode machine will increase load when frequency is below 50 Hz. In this proposed DSM we have to pay penalty during operation in low frequency zone as machine response will reach up to 105% of its predefined schedule.</p> <p>Further, when machine is in RGMO/FGMO mode machine will decrease load when frequency is above 50 Hz. In this proposed DSM we have to pay huge penalty during operation in high frequency zone also as machine will decrease load from its predefined schedule.</p> <p>So this new proposed regulation is clearly conflicted with the grid code which state that machine will be required to run in RGMO mode.</p> <p>In addition to this:</p> <p>i) Currently to accommodate renewable generation, thermal generating stations will have to follow high ramp up and ramp down rates to meets the demand. It is difficult for thermal generating station to maintain the over injection / under injection within 2% of schedule generation - when block to block schedule have large variations, and high ramp rates are much required to meet the schedule.</p> <p>ii) Coal quality variation is beyond the control of generators; even when the schedule is constant, thermal generating station faces challenges in maintaining the actual generation within 2% of the schedule due to variation in coal quality as coal from multiple sources are being fed into the boiler. Practically, in rainy season this type of trouble is more predominant due to wet coal. It is also common to encounter various operational challenges like - mill choking or feeder blockage during</p>

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		<p>monsoon, or any malfunctioning of its auxiliary, that can normally constrain the generator from meeting its schedule.</p> <p>In view of above, 2% limit in both direction is very difficult to maintain, hence, Hon'ble commission is requested to relax the norms up to 5% in both direction</p>
<p>Draft Regulation Clause: 5.(1)</p>	<p><b><u>Adherence to Schedule and Deviation</u></b></p> <p>(1) Every grid connected regional entity shall adhere to its schedule as per the Grid Code and shall not deviate from its schedule, thereby adversely affecting the secure and stable operation of the grid.</p>	<p>Generators actually supported the system by under injection during over frequency or over injection during under frequency regime. It would be done in the interest of a stable grid, that the running generators continue to ensure over long periods of time.</p> <p>Now if the system frequency is sustained high or sustained low for a major part of the day and if the generators are supporting the system, then they should not be penalized.</p> <p>The Hon'ble commission is requested to review the frequency independent grid regulation and remove the same for stability of the system at any untoward situation.</p> <p>The existing DSM regulations already provides for incentives and penalty based on prevailing frequency, but the proposed regulation only based on penalty system which in long turn forced all constituents to behave indifferent during any frequency exigency.</p>