



सत्यमेव जयते

भारतसरकार  
Government of India  
केंद्रीयविद्युत्प्राधिकरण  
Central Electricity Authority  
पश्चिमक्षेत्रीयविद्युत्समिति

Western Regional Power Committee

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No.WRPC/CERC/DSM/2021/1006

To,

The Secretary,  
CERC,  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building,  
36, Janpath,  
New Delhi- 110001

**Subject: Comments/ suggestions on draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2021-reg.**

**Respected Sir,**

Please find enclosed herewith the comments/ suggestions of WRPC Secretariat on draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2021 for your kind perusal.

Encl: As above.

Yours Faithfully

(Satyanarayan S.)

Member Secretary

**Comment 1: Reg 7. Normal Rate of Charges for Deviations:**

Under the existing Ancillary Services Regulations, the Ancillary Services providers are those generators whose tariff is determined/adopted by Central Commission. Therefore the basket of Ancillary Services providers is limited.

During the peak period, generally, all the cheaper stations are fully scheduled. The available ancillary service capacities during this period are generally the gas stations based on Competitive gas, RLNG and Liquid Gas generation. The cost of utilization of this generation is high on one hand and on the other hand the quantum of utilization of such generation is low. This may lead to exorbitant “Normal Rate of Charges for Deviations” during the blocks when only gas based generators are used as Ancillary Service Providers.

Therefore, the modification suggested is

“while considering the “Weighted Average Ancillary Service Charge”, the ancillary services utilized of the gas stations based on Competitive gas, RLNG and Liquid Gas generation may be omitted, if the quantum of generation from these services is more than say, 30% of the total Ancillary Service quantum.”

Typical cost of generation:

Stn. Name	Cost of gen on Competitive gas	Cost of gen on RLNG gas	Cost of gen on Liquid gas	Month
Kawas	Rs.13.60/-(CC), Rs. 19.61/-(OC);	Rs.10.10/-(CC), Rs. 14.58/-(OC)	Rs.13.97/-(CC), Rs. 20.16/-(OC)	Sept.21-Oct.21
Gandhar	Rs.13.61/-(CC), Rs. 19.40/-(OC);	Rs.10.49/-(CC), Rs. 14.96/-(OC)	---	Sept.21-Oct.21

**Comment 2: Reg.9 (3) :**

Since the Collection and Disbursal of the charges of deviations is done by RLDCs, the responsibility of Separate books of accounts for the principal component and interest component of charges for deviation be maintained by RLDCs. These accounts shall be made available to all the regional entities on the web site of RLDCs. The information shall also be put up in the appropriate sub-Committees/Committee of RPCs.

**Comment 3 : 10. Schedule of Payment of charges for deviation**

(2) Any regional entity which at any time during the previous financial year **or current financial year** fails to make payment of charges for deviation within the time specified in these regulations, shall be required to open a Letter of Credit (LC) equal to 110% of their average payable weekly liability for deviations in the previous financial year in favour of the concerned Regional Load Despatch Centre within a fortnight from the start of the current financial year **or from the last failure**.

**Some action may be proposed on the regional entity if it fails to open the LC within above time line.**

**Comment 4 : Additional clause :**

**9. (8) A clause on the real time SCADA drawl data may be added:** A clause may be introduced on the error between real time SCADA drawl/injection data and the Interface Meter drawl/injection data. These errors give wrong signals to the Regional Entity during real time operation in planning their resources to contain deviation and results in an inadvertent deviation by the Regional Entities. A strict compliance on maintenance of SCADA equipments and communication may be made compulsory on the entities responsible for maintaining/providing such data.