



सत्यमेव जयते

भारत सरकार
Government of India
विद्युत मंत्रालय
Ministry of Power
पूर्वी क्षेत्रीय विद्युत समिति

Eastern Regional Power Committee
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To,

Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building, 36,
Janpath, New Delhi - 110001

Sub: Comments on Draft Central Electricity Regulatory Commission (Ancillary Services) Regulations, 2021 – regarding.

Reference is invited to Public Notice issued by CERC vide Letter No. RA-14026(11)/3/2019-CERC dated 29th May, 2021 inviting Comments/ suggestions/ objections from the stakeholders and interested persons on the Draft Central Electricity Regulatory Commission (Ancillary Services) Regulations, 2021.

Accordingly, please find enclosed the comments of Eastern Regional Power Committee (ERPC), Kolkata on the aforesaid Draft Regulation of CERC.

Encl. As above

Yours faithfully,


30/6/2021
(N. S. Mondal)

Member Secretary

Comments on Draft CERC (Ancillary Services) Regulations, 2021

Clauses in the Draft Regulations	Comments/Suggestions
<p>7. Eligibility for an SRAS Provider:</p> <p>(b) is AGC-enabled, in case of a generating station;</p>	<p>b) In the existing scenario, RRAS mechanism is there in place for all Central Sector ISGS including one IPP (MPL) in Eastern Region. However, AGC is enabled in only one ISGS (Barh STPS of NTPC).</p>
<p>9. Procurement of SRAS</p> <p>Clause (7) The Nodal Agency, based on the estimate of the SRAS requirement as per Regulation 6 of these regulations, shall ascertain availability of adequate reserves on day-ahead basis and on real time basis before the gate closure of the Real Time Market.</p>	<ul style="list-style-type: none"> • With the large integration of RE Capacity into the system and due to its intermittent and variable nature, the electrical grid is prone to be imbalanced. • Power plants that are currently allowed to participate in the Ancillary Services Mechanism can be recalled for serving the states that have paid the capacity charges for their capacity share in these power plants. • Thus, there is a need for providing a regulatory framework, for creating adequate system reserves including spinning reserves. • The reserve requirement should be flexible since the Reserve Requirement could vary by seasons such as Low Demand Season and High Demand season and as well as peak and off-peak periods of the day.
<p>10. Selection of SRAS Providers and Despatch of SRAS</p> <p>Clause 8) Secondary control signals for SRAS-Up and SRAS-Down shall be sent to the control centre of the SRAS Provider every 4 seconds by the Nodal agency.</p>	<ul style="list-style-type: none"> • Since the drawl entity is also eligible for SRAS provider, in response to the control signal from the system operator, how the consumption of the drawl entity would be controlled where the sudden load increment and load shedding may not be possible. • There could be a contradiction between the SRAS (Up/Down) instruction and the sign change violation to manage deviation from their drawl schedule.
<p>12. Performance of SRAS Provider and incentive.</p>	<p>The SRAS Providers would be eligible for incentive based on the performance measured through the X-Y</p>

<p>(2) All measurements of secondary control signals from the Nodal Agency to the control centre of the SRAS Provider and actual response of SRAS Provider shall be carried out on post-facto basis using SCADA data.</p> <p>Performance of the SRAS Provider shall be measured by the Nodal Agency by comparing the actual response measured against the secondary control signals for SRAS-Up and SRAS-Down sent every 4 seconds to the control centre of the SRAS Provider.</p>	<p>scatter plot in which the comparison will done for the actual response provided by the SRAS Provider against the secondary control signal sent every 4 seconds on post-facto basis using SCADA data for each day.</p> <p>However, the SCADA system is inherently sluggish in nature and most of the utilities do not find them to be reliable for the purpose of managing their deviations from schedule.</p> <p>Therefore, for fast and reliable communication network between SRAS provider and the Nodal agency, Automated Meter Reading (AMR) based real time telemetry system or Optical fibre communication network may be explored.</p>
<p>20. Shortfall in Procurement of SRAS and TRAS or Emergency Conditions:</p> <p>(2) The generating stations as referred to in clause (1) of this Regulation, whose URS is despatched as SRAS-Up shall be paid their variable charge in terms of clause (1) of Regulation 11 and incentive in terms of Regulation 12 of these regulations.</p> <p>(4) The generating stations as referred to in clause (1) of this Regulation, whose URS is despatched for TRAS-Up, in the event of short-fall in the procurement of TRAS-Up through the Market, shall be paid at the rate of their variable charges for the quantum of TRAS-Up despatched.</p>	<p>In the existing RRAS mechanism, fixed charges are refunded to the original beneficiaries in the ratio of their surrendered share. However, in the proposed ancillary services regulations, the provisions for refund of fixed charges to original beneficiaries have not been included despite the fact the SRAS will be despatched out of URS quantum available.</p>
<p>Appendix-II : Methodology for Measurement of Performance of SRAS Provider</p> <p>(3) Incentive payments shall be calculated for each SRAS Provider for energy supplied for a day as follows: Incentive for SRAS Provider = Actual Response (MWh) x (1-NAC) x Incentive Rate</p>	<p>i) There is no formula to incentivise Regional Entities except Generating stations.</p> <p>ii) The formula for the Incentive calculation of the SRAS Provider may be separated.</p> <p>SRAS Provider (Generator) = Actual Response (MWh) x (1-NAC) x Incentive Rate</p> <p>iii) SRAS Provider (Regional Entities except generating Stations)</p>

<p>Where NAC is percentage Normative Auxiliary Energy Consumption</p>	<p>= Actual Response (MWh) x Incentive Rate</p>
<p>Appendix-I:</p> <p>In the Methodology for calculation of Custom Participation Factor and Allocation of Secondary Control Signal among SRAS-Up Providers:</p> <p>SRAS signal shall be allocated among the SRAS Providers to meet SRAS requirement of the system based on the normalised Custom Participation Factor subject to the ramp limited resources available with the SRAS Provider(s).</p>	<p>It is suggested that the SRAS Up or Down signals may be allocated to SRAS providers such that the total SRAS requirement may be apportioned among the SRAS providers by giving maximum despatch instruction to SRAS provider with higher normalised Custom Participation Factor subject to their Ramp limited reserve limit. SRAS Up or Down instructions may be given to the SRAS providers in the decreasing order of their normalised Custom Participation factor subject to their Ramp limited reserve till the entire SRAS requirement is met.</p>