



M.P. POWER MANAGEMENT COMPANY LIMITED

CIN: U40109MP2006SGC018637 (A Government of M.P. Undertaking)

DIRECTOR COMMERCIAL

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No: Dir (Commercial)/2021-22/ 30

Bhopal, dated 15.07.2021

To,

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


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

Sir,

This is in reference to the Central Electricity Regulatory Commission Public Notice dated 29th May 2021 regarding inviting comments/ suggestions/ objections from the stakeholders and interested persons on the Draft Central Electricity Regulatory Commission (Ancillary Services) Regulations 2021.

Please find attached comments of M.P. Power Managements Company Limited on Draft Central Electricity Regulatory Commission (Ancillary Services) Regulations 2021 for your kind consideration.

Yours Sincerely


Sanjay Okhade 15/7/21
General Manager (PM)

Subject: - MPPMCL Comments on Draft Central Electricity Regulatory Commission (Ancillary Services) Regulations, 2021.

S. No	Draft CERC (Ancillary Services) Regulations, 2021	Comments/Suggestions of MPPMCL
1	<p align="center">REGULATION 11. PAYMENT FOR SRAS</p> <p>(1) SRAS Provider shall be paid from the Deviation and Ancillary Service Pool Account, at the rate of their variable charge or compensation charge, as declared by the SRAS Provider, as the case may be, for the SRAS-Up MW quantum despatched for every 15 minutes time block, calculated as per clause (12) of Regulation 10 of these regulations.</p>	<p>MPPMCL opines that provision of existing Ancillary Regulations 2015 Regulation 13.3 <i>“The RRAS Provider(s) shall be paid at their fixed and variable charges, with mark Up on fixed cost, as decided by the Commission through a separate order from time to time in case of Regulation Up services for the quantum of RRAS scheduled, from the Regional Deviation Pool Account Fund”</i> should be retained for sharing of Fixed Charges.</p> <p>MPPMCL suggests that the Regulation 11 of Draft Ancillary Services Regulation 2021 should be amended accordingly.</p> <ol style="list-style-type: none"> 1. SRAS Provider shall be paid at the rate of their variable charge or compensation charge along with the Fixed Charge as approved by the Hon’ble Commission. 2. Fixed Charges shall be adjusted to the Original Beneficiaries for the quantum of Un-Requisitioned Surplus scheduled under Regulation Up Service.




S. No	Draft CERC (Ancillary Services) Regulations, 2021	Comments/Suggestions of MPPMCL
2	<p align="center">REGULATION 19. PAYMENT FOR TRAS</p> <p>(1) TRAS-Up Provider shall receive MCP-Energy-Up, as discovered in the Day Ahead Market or the Real Time Market, as the case may be, for the quantum of energy instructed to be despatched by the Nodal Agency.</p>	<p>MPPMCL opines that provision of existing Ancillary Regulations 2015 Regulation 13.3 <i>"The RRAS Provider(s) shall be paid at their fixed and variable charges, with mark Up on fixed cost, as decided by the Commission through a separate order from time to time in case of Regulation Up services for the quantum of RRAS scheduled, from the Regional Deviation Pool Account Fund"</i> should be retained for sharing of Fixed Charges.</p> <p>MPPMCL suggests that the Regulation 19 of Draft Ancillary Services Regulation 2021 should be amended accordingly.</p> <ol style="list-style-type: none"> 1. TRAS-Up Provider shall receive MCP-Energy-Up, as discovered in the Day Ahead Market or the Real Time Market, as the case may be, for the quantum of energy instructed to be despatched by the Nodal Agency along with the Fixed Charge as approved by the Hon'ble Commission. 2. Fixed Charges shall be adjusted to the Original Beneficiaries for the quantum of Un-Requisitioned Surplus scheduled under Regulation Up Service.




S. No	Draft CERC (Ancillary Services) Regulations, 2021	Comments/Suggestions of MPPMCL												
3	<p>REGULATION 12. PERFORMANCE OF SRAS PROVIDER AND INCENTIVE</p> <p>(3) SRAS Provider shall be eligible for incentive based on the performance measured as per clause (2) of this Regulation and the 5-minute MWh data calculated for SRAS-Up and SRAS-Down as per clause (11) of Regulation 10 of these regulations and aggregated over a day, as under:</p> <table border="1" data-bbox="571 922 879 1921"> <thead> <tr> <th>Actual performance vis-à-vis secondary control signal for an SRAS Provider</th> <th>Incentive Rate (paise/kWh)</th> </tr> </thead> <tbody> <tr> <td>Above 95%</td> <td>(+) 40</td> </tr> <tr> <td>70-95 %</td> <td>(+) 30</td> </tr> <tr> <td>45-70%</td> <td>(+) 20</td> </tr> <tr> <td>20-45%</td> <td>(+) 10</td> </tr> <tr> <td>Below 20%</td> <td>0</td> </tr> </tbody> </table>	Actual performance vis-à-vis secondary control signal for an SRAS Provider	Incentive Rate (paise/kWh)	Above 95%	(+) 40	70-95 %	(+) 30	45-70%	(+) 20	20-45%	(+) 10	Below 20%	0	<p>Primary criteria for any Generating Station to qualify and participate under SRAS is availability of URS, which is achieved on quantum not scheduled by the beneficiaries. Hence it is proposed that Incentive gained by the SRAS Provider under the Regulation may be shared with the Original Beneficiary in the 50:50 ratio or as deem fit by the Hon'ble Commission.</p>
Actual performance vis-à-vis secondary control signal for an SRAS Provider	Incentive Rate (paise/kWh)													
Above 95%	(+) 40													
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4	<p>REGULATION 19. PAYMENT FOR TRAS</p> <p>(2) TRAS-Up Provider shall receive commitment charges at the rate of ten percent of the MCP-Energy-Up-DAM or the MCP-Energy-Up-RTM, as the case may be, subject to the ceiling of 20 paise/kWh for the quantum of TRAS-Up cleared in the Day Ahead Market or the Real Time Market as the case may be, but not instructed to be despatched by the Nodal Agency.</p>	<p>It is pertinent to mention that since the Original Beneficiaries has surrendered their Right to Recall which enabled the TRAS Provider to participate under the DAM/RTM, hence the commitment charges to be shared with Original Beneficiary in the ratio of 50:50 or as deem fit by the Hon'ble Commission. This sharing mechanism will motivate Original Beneficiaries to forecast their Demand more precisely and increase participation in the TRAS DAM/RTM.</p>												

