

Ref. MSEDCL/Comments/CERC/Ancil Serv / **14373**

DATE: **28.06.2021**

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

**Sub:** Submission of comments / suggestions / objections on Draft CERC (Ancillary Services) Regulations, 2021.

**Ref:** Public notice by CERC for draft regulation dated 29<sup>th</sup> May 2021

Respected Sir,

This is in reference to public notice issued by Hon'ble CERC on Draft CERC (Ancillary Services) Regulations, 2021. MSEDCL is hereby submitting its comments /suggestions on some of the draft provisions of said regulations and are as under:

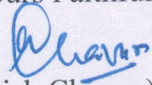
Sr. No	Draft Provision	Comments/Suggestions
1.	<b>7. Eligibility for an SRAS Provider</b>  (1) A generating station or an entity having energy storage resource or demand side resource, connected to inter-State transmission system or intra-State transmission system, shall be eligible to provide Secondary Reserve Ancillary Service, as an SRAS Provider, if it.	Presently, in Maharashtra payment of energy charges to long term contracted generator is based on the actual injection basis under FBSM regime. Hence, participation of long term contracted intra-state generator in SARS /TRAS will create commercial dispute between the Generators and the DISCOMS under the provisions of the PPA . Hence, in order to avoid dispute between the generators & DISCOMs it is suggested that the intra state generators which is under long term agreements with DISCOM will be allowed participated in this regulation only if DISCOM has given the consent to the concern generators.
2	<b>14. Eligibility for a TRAS Provider</b> A generating station or energy storage resource or demand side resource connected to inter-State transmission system or intra-State transmission system shall be eligible for participation as TRAS Provider, if ..... .....	
3.	<b>10. Selection of SRAS Providers and Despatch of SRAS</b>  (12) Average of SRAS-Up and SRAS-Down MW data shall be calculated for every 15 minutes time block in MWh for every SRAS Provider by the Nodal Agency using the archived SCADA data at the Nodal Agency and reconciled with the data received at control	MSEDCL suggest that the energy meter data for 15 min is available; hence accounting of same shall be done on meter data instead of SCADA data which is not correct representation of meter data due to inherent difference in computation of Energy in SCADA and meter data. Further, it is suggested that meter capable of recording 5 min integration period shall be procured and

	centre of the SRAS Provider and shall be used for payment of variable charge or compensation charge, as the case may be, to the SRAS Provider as per Regulation 11 of these regulations.	installed on priority on these interface points.												
4.	<p><b>12. Performance of SRAS Provider and incentive</b></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"> <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% to 95%</td> <td>(+) 30</td> </tr> <tr> <td>45% to 70%</td> <td>(+) 20</td> </tr> <tr> <td>20% to 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% to 95%	(+) 30	45% to 70%	(+) 20	20% to 45%	(+) 10	Below 20%	0	Normally Generators are receiving signal through strong communication network, which in other word means Generator will normal achieve performance of above 90% unless there is some problem in Generator. Further performance is being calculated on a Day basis and not for each 5 minute time block. Hence it is suggested that Incentive shall be capped at 20 Paise instead of 40 Paise starting with 5 Paise for 20% to 45%.
Actual performance vis-à-vis secondary control signal for an SRAS Provider	Incentive Rate (paise/kWh)													
Above 95%	(+) 40													
70% to 95%	(+) 30													
45% to 70%	(+) 20													
20% to 45%	(+) 10													
Below 20%	0													
5.	<p><b>19. Payment for TRAS</b></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>(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>	In case of long term contracted generators participated in TRAS-Up receives MCP Energy-Up and the commitment charges. DISCOM has tied up with these generators and the fixed cost liability persists with DISCOM even when the power is not scheduled. These generators are generally risk free as they are assured of fixed cost from DISCOM. On the other hand the exigencies like breakdown/ tripping/ shutdown etc. are to be borne by the DISCOMs. Participation of such generators in SRAS/TRAS will provides additional income opportunity and hence it is requested that the benefits accrued from the SRAS/TRAS shall be shared to the DISCOM.												

It is kindly requested to the Hon'ble Commission to consider MSEDCL's comments / suggestions on Draft CERC (Ancillary Services) Regulations, 2021.

With Regards,

Yours Faithfully,

  
(Satish Chavan)

**Director (Commercial)I/c,MSEDCL**

**Copy s.w.r.to:**

Chairman and Managing Director, MSEDCL, Corporate office, Mumbai.