



CAPTIVE POWER PRODUCERS ASSOCIATION

(Registered U/sec. 25 of Company Act 1956 & Certificate of IT 12AA
CIN: U91990MH2003GAP141611)

Secretariat Office
Technocraft Industries (India) Ltd.
Technocrat House A-25 MIDC, Marol Andheri (East),
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Vikas Patangia
PRESIDENT

To,

Date :18th Oct, 2022

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

**Comments on proposed Draft Central Electricity Regulatory Commission
(Indian Electricity Grid Code) Regulations, 2022.**

Dear Sir,

Captive Power Producers Association (“CPPA”) is representing the interest of Industries in various States and UTs having captive power plants at their industries in fulfilling the energy requirement of their industries through captively produced power.

First of all, we would like to thank you for the proposed Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2022.

The proposed draft Regulation spans in 10 chapters specifying the grid standards, planning, commercial, and operational criteria for interaction with Grid. It will help to align the existing IEGC Regulations to integrate futuristic changes w.r.t. GNA, SCED and SCUC and Ancillary Services etc.

In response to some of the proposed Regulations, we would like to submit our comments as per **Annexure – I**.

We request you to consider our comments while finalising the amendment and also provide us an opportunity to discuss our comments in person / during hearing.

Thanking you.

**Yours faithfully,
For Captive Power Producers Association**

Annexure – I

CPPA - Comments/suggestions on Draft CERC (Indian Electricity Grid Code) Regulations, 2022.

SL. No.	Regulation	Draft Suggestion and comments	Rational Comments/Suggestions for
1.	<p>Chapter 3. Connection Code 8. Procedure for Connection.</p> <p>New Proviso to be added</p>	<p>Consumers, those who are granted STU Connectivity and willing to apply for CTU connectivity are asked to surrender existing STU Connectivity.</p> <p>New proviso to be added to allow both Connectivity's without surrendering any CD to STU.</p>	<p>If CTU connected consumer is wheeling power from outside state, and in case of any failures or due to any other issue requires power. Hence, the provision of STU connectivity should not be asked to surrender.</p> <p>The Provision of both Connectivity's will facilitate the consumer to be applicable to draw power from grid (Host Discom) in case of exigencies with allowable connected load and Contract demand.</p> <p>Hence, the same should be incorporated in connection code of proposed regulation.</p>

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2.	Chapter 7, Scheduling and Despatch Code. Clause 47. Procedure For Scheduling and Despatch For Inter-State Transactions 47 .1 (j)	Draft Regulation proposes to change the Bidding time of Day ahead Market at Power exchanges from 10.00 AM to 11.30 AM as compared current time from 10.00 AM to 12.00 PM. The proposed new time reduces the window for Bidding at DAM. The Current timings i.e from 10.00 AM to 12.00 PM should be continued.	The proposed new bidding time line in Day ahead market will be reducing the Gate closure time by Half Hour (30 Minutes). This will be inadequate for Planning and submission of bids with large portfolios. Bidding time should be at least for 2 hour in the normal working Hours.
3.	Clause 47. Procedure For Scheduling and Despatch For Inter-State	Draft Regulation proposes to change 47.1 (L) “RLDC shall process	Providing exigency application time till 2.00 PM will give

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	<p>Transactions 47 .1 (L)</p>	<p>exigency applications received till 1 PM of ‘D-1’ day for the ‘D’ day by 2 PM of ‘D-1’ day.”</p> <p>As per the proposed draft 47.1 (j)(iv) <i>The power exchange shall submit the final trade schedules to NLDC for regional entities and to SLDC for intra-State entities by 1.00 PM of ‘D-1’ day.</i></p> <p>And draft 47.1 (k) <i>RLDC shall release balance corridors after finalisation of schedules under day ahead collective transactions by 1.00 PM of ‘D-1’ day.</i></p> <p>Hence, the Exigency application received till 2.00 PM of ‘D-1’ day should be allowed and processed. There should be atleast 1 hour time zone to Participant after exchange market hours, if the bids are not selected or partially selected at Power exchanges.</p>	<p>additional opportunity to participants to apply in T-GNA (Bilateral) under day ahead / contingency, In case the applicants bid is not selected or partially selected in collective market (Day ahead or Green day ahead Market.)</p>
4.	<p>Clause 47.4 Revision of schedules on request of regional entities: 47.4 (a) and (b)</p>	<p>Draft Regulation proposes change in revision under Short term transaction (T-GNA).</p> <p>47.4 (a) SLDCs, regional entity generating stations, regional entity ESSs, beneficiaries,</p>	<p>As per the CERC, GNA and Connectivity Regulation 2022, T-GNA is specified as application for any period from 1 time block and up to 11 months. Hence, its necessary to continue existing</p>

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		<p>buyers or cross-border entities may revise their schedules under GNA as per clause (b) and clause (c) of this Regulation in accordance with their respective contracts.</p> <p>Provided that <u>scheduled transactions under T-GNA once scheduled cannot be revised other than in case of forced outage as per clause (7) of Regulation 47 of these regulations.</u></p> <p>(b) The request for revision of scheduled transaction for ‘D’ day, shall be allowed to be made in any time block starting 2 PM on ‘D-1’ day subject to the following:</p> <p>(i) In respect of a generating stations whose tariff is determined under Section 62 of the Act, upward revision of schedule shall be allowed starting 2 PM on ‘D-1’ day, only in respect of the remaining available quantum of un-requisitioned surplus after finalization of schedules under day ahead market.</p> <p>(ii) In respect of a generating stations whose tariff is not determined under Section 62 of the Act, revision of schedule shall be in terms of provisions</p>	<p>provisions for the revision of FCFS and Advance application. Hence, the regulation should capture necessary proviso and clarify regarding the revision under T-GNA.</p>

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		<p>of the respective contracts between the generating stations and beneficiaries or buyers.</p> <p>From Clause 47.4 (a) it implies that revision under T-GNA is not allowed once its scheduled.</p> <p>As per the current regulation, Downward Revision under STOA Is allowed in the Advance and FCFS STOA category with two days advance notice.</p> <p>Hence, Clarity wrt revision of FCFS and advance application should be captured in the proposed regulation.</p>	