

17th Oct, 2022

DEPL/CERC/2022-2023/01

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

Sub: Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2022

Dear Sir,

This has reference to public notice issued by CERC on 29/09/2022 vide reference no. L-1/265/2022/CERC inviting comments on above subject draft regulations. DANS Group having its SPVs being DANS Energy Pvt. Ltd. & Shiga Energy Pvt. Ltd. with two operational hydro power projects viz. 96 MW Jorethang Loop HEP and 97 MW Tashiding HEP respectively in Sikkim. Our comments on the draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2022 are enclosed herewith for your kind consideration please.

Thanking you,

Yours Sincerely,
for **DANS Energy Pvt. Ltd.**


Vijay Kumar Paila
DGM, PS&R



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Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations,

2022

S No.	Regulation/Clause No.	Regulation	Comments / Rationale
1.	Regulation 45 (15) – General Provisions	45 (15) A generating station including renewable energy generating station shall be allowed to draw power from ISTS during non-generation hours, whether before COD or after COD, only after obtaining schedule for such drawal of power in accordance with a valid contract entered into by it with a seller or distribution licensee or through power exchange.	<p>The hydro generating stations draw power from the state/regional grid for its auxiliary consumptions only during the non-monsoon season. It is submitted that, during the non-monsoon season, the hydro power plant carries out major maintenance activities and during such periods, scheduling of power before drawing power from the grid is very difficult considering the continuous variation in load for grinding and machining activities in the plant. Hence, it is requested to kindly consider the revision of clause for hydro power project as the projects operation completely dependent on seasonal basis.</p> <p><u>Modified clause for consideration to CERC:</u> Request the following changes may be made under Regulations 45(15) as under:</p> <p>45 (15) A generating station including renewable energy generating station shall will be allowed to draw power from ISTS during non-generation hours, whether before COD or after COD, only after obtaining schedule for such drawal of power in accordance with a valid contract entered into by it with a seller or distribution licensee or through power exchange.</p> <p><u>Provided that the renewable energy sources including hydro generating stations will be allowed to draw power</u></p>



			<p><u>during non-generation hours.</u></p>
2.	Regulation 47 (7)	<p>47 (7) In case of forced outage of a unit of a generating station (having generating capacity of 100 MW or more) and selling power under bilateral transaction (excluding collective transactions in day ahead market and real time market through power exchange), the generating station or electricity trader or any other agency selling power from the unit of the generating station shall immediately intimate the outage of the unit along with the requisition for revision of schedule and estimated time of restoration of the unit, to SLDC or RLDC, as the case may be. The schedule of beneficiaries, sellers and buyers of power from this generating unit shall be revised accordingly. The revised schedules shall become effective from the time block and in the manner as specified in Clause (4) of this Regulation:</p>	<p>During the forced outage of plant, the schedule of generating station was not revised earlier by the RLDCs considering the unit capacity of less than 100 MW even though the plant generating capacity is more than 100 MW. It is submitted that, to avoid ambiguity in the clause, it is requested to kindly allow to revise the schedule for generating capacity or station capacity of more than 100 MW irrespective of unit capacity during the forced outage.</p> <p><u>Modified clause for consideration to CERC:</u></p> <p>47 (1) In case of forced outage of a unit of a generating station (having generating station capacity of 100 MW or more) and selling power under bilateral transaction (excluding collective transactions in day ahead market and real time market through power exchange), the generating station or electricity trader or any other agency selling power from the unit of the generating station shall immediately intimate the outage of the unit along with the requisition for revision of schedule and estimated time of restoration of the unit, to SLDC or RLDC, as the case may be. The schedule of beneficiaries, sellers and buyers of power from this generating unit shall be revised accordingly. The revised schedules shall become effective from the time block and in the manner as specified in Clause (4) of this Regulation:</p>



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