

From: "saugato majumdar" <[saugato.majumdar@rpsg.in](mailto:saugato.majumdar@rpsg.in)>  
To: "Suvijit Suvijit" <[ecourtastt101@cercind.gov.in](mailto:ecourtastt101@cercind.gov.in)>, "suvijit sri" <[suvijit.sri@gmail.com](mailto:suvijit.sri@gmail.com)>  
Sent: Wednesday, October 26, 2022 1:39:42 PM  
Subject: DIL Comments on Draft CERC (Indian Electricity Grid Code) Regulations, 2022

Dear Sir/Madam,

We thank the Hon'ble Commission for bringing out the draft Regulations dated 07.06.2022 on "Indian Electricity Grid Code Regulations, 2022" and providing an opportunity to all stakeholders to provide comments on the same.

In view of the above, please find attached the comments on behalf of Dhariwal Infrastructure Limited (DIL) on the aforesaid draft Regulations for your kind perusal and consideration.

Thanks & Regards,

Saugato Majumdar

Manager (Corporate Regulatory Affairs & Power Sale)

Dhariwal Infrastructure Limited

Mob: [+918584069139](tel:+918584069139)

## **DHARIWAL INFRASTRUCTURE LIMITED**

### Comments on CERC (Indian Electricity Grid Code) Regulations, 2022

At the outset, Dhariwal Infrastructure Limited (“DIL”) would like to thank the Hon’ble Central Electricity Regulatory Commission (“**Hon’ble Commission**”) for bringing out the Indian Electricity Grid Code Regulations, 2022 and providing the stakeholders an opportunity to provide comments/suggestions on the same. Accordingly, the comments and suggestions on behalf of DIL on the afore-said draft Regulations are provided in the following matrix for the kind perusal of the Hon’ble Commission.

<b>REGULATION</b>	<b>PROPOSED REGULATION</b>	<b>COMMENTS AND SUGGESTIONS</b>
<i>Chapter 7</i>	<i>Scheduling and Despatch Code</i>	<p><b>In our humble opinion, as presently the information on the data of Total Transfer Capability and Available Transfer Capability are not available on real-time basis and are issued based on periodic revisions resulting in a time-lag, it is submitted that the same may be displayed on real time basis on the website of NLDC/RLDC/SLDC so that stakeholder can take informed decision regarding likely constraints in generation despatches.</b></p> <p>One of the reasons for development of any market is data transparency and timely dissemination of such data. In case of power market, the symmetric access to transmission and power system data helps us to take informed decisions regarding likely constraints in generation despatches thereby affecting buying/selling decisions. Therefore, as real time data of power system and transmission capacity is not available on NLDC, RLDCs and SLDCs website, it is suggested that NLDC/RLDC/SLDCs should publish Real Time Generation along-with the TTC and ATC data on real time basis on the website so that the stakeholders can take prudent decision based on such information.</p>
<i>43(5)</i>	<i>Entities connected to both inter-State transmission system and intra-State transmission system shall be under control area jurisdiction of RLDC, if more than</i>	<p><b>We request the Hon’ble Commission to kindly clarify with reference to this Regulation, the Control Area of Jurisdiction of load despatch centres in instances wherein a generating company has 50% of quantum connected with ISTS and 50% of quantum connected with InSTS.</b></p>

**DHARIWAL INFRASTRUCTURE LIMITED**

**Comments on CERC (Indian Electricity Grid Code) Regulations, 2022**

<b>REGULATION</b>	<b>PROPOSED REGULATION</b>	<b>COMMENTS AND SUGGESTIONS</b>
	<i>50% of quantum of connectivity is with ISTS, and if more than 50% of the quantum of connectivity is with intra-State transmission system, then it shall be under control area jurisdiction of SLDC.</i>	<b>Hence is suggested that we modify the clause as:</b>  <i>Entities connected to both inter-State transmission system and intra-State transmission system shall be under control area jurisdiction of RLDC, if 50% or more of quantum of connectivity is with ISTS, and if more than 50% of the quantum of connectivity is with intra-State transmission system, then it shall be under control area jurisdiction of SLDC.</i>
45(12)	<i>Minimum turndown level for thermal generating stations ... Provided also that the regional entity thermal generating stations shall be compensated for generation below the normative level either as per the mechanism in the Tariff Regulations or in terms of the contract entered into by such generating station with the beneficiaries or buyers, as the case may be.</i>	<b>It is pertinent to note that in view of must run status for renewable power, the plant load factor of thermal power plants have been affected. The present CERC (IEGC) Regulations 2010 (and subsequent amendments) in force allows for part-load compensation on operating parameters namely, Station Heat Rate, Auxiliary Energy Consumption and Secondary fuel-oil consumption for generation below normative levels. In line with the same, we request the Hon’ble Commission to incorporate similar provisions in final IEGC Regulations 2022 as in Regulation 6.3B of the CERC (IEGC) Regulations 2010 as amended from time to time for all generating stations irrespective of the nature of their PPAs (Section 62 as well long term or medium term PPA under Section 63). Only short term PPA under Section 63 provides relief against lesser offtake by beneficiaries).</b>
46(4)	<i>The SCUC may be undertaken on day ahead basis, in respect of the generating stations or units thereof, for which tariffs are determined by the Commission under section 62 of the Act.....</i>	<b>In our considered opinion, as there should not be any disparity between cost-plus projects (u/s 62 of the Act) and competitively bid projects (u/s 63 of the Act), the said provision for participation under SCUC shall also be allowed to generating companies under Section 63 of the Act.</b>
46(4)(h)(2)	<i>In case a generating station, or unit thereof, opts to go under unit shut down (USD), the generating company owning such generating station or unit</i>	<b>We request the Hon’ble Commission to kindly clarify in appropriate Regulations with reference to this Regulation, that during instances, where a generating company goes under unit Shut down, the obligation</b>

**DHARIWAL INFRASTRUCTURE LIMITED**

**Comments on CERC (Indian Electricity Grid Code) Regulations, 2022**

REGULATION	PROPOSED REGULATION	COMMENTS AND SUGGESTIONS
	<p><i>thereof shall fulfil its obligation to supply electricity to its beneficiaries who had made requisition from the said generating station prior to it going under USD, by entering into a contract(s) covered under the Power Market Regulation or by arranging supply from any other generating station or unit thereof owned by such generating company subject to honouring of rights of the original beneficiaries of the said generating station or unit thereof from which supply is arranged.</i></p>	<p><b>of Fixed Charges shall be honoured by the original beneficiaries to the extent of delivery met by the generating company by entering into a contract(s) covered under the Power Market Regulation (or by arranging supply from any other generating station). In other words, the commercial settlements during USD should be clearly stipulated in the final IEGC 2022.</b></p>
<p>47(1)(i)</p>	<p><i>The generating station whose tariff is determined under Section 62 of the Act, may sell its unrequisioned surplus as available at 10 AM in the day ahead market.</i></p>	<p><b>In our opinion, there should not be any discrimination pertaining to sale of un-requisitioned surplus in the day Ahead between cost-plus projects (u/s 62 of the Act) and competitively bid projects (u/s 63 of the Act). In our considered opinion, the said provision for sell of un-requisitioned surplus shall only be allowed to all generating companies under Section 62 or section 63 of the Act only in Real time market. Thus, all beneficiaries shall have the right to recall the unrequisioned power till the Real time market commences.</b></p>
<p>47(2)(a)(iii)</p>	<p><i>(a) Security Constrained Economic Despatch (SCED) .... (iii) The generating stations, including those for which the tariff is determined by the Commission under Section 62 of the Act, willing to participate in SCED shall declare at their discretion, the variable charges upfront to NLDC on weekly basis after factoring in likely changes in fuel cost and part load</i></p>	<p><b>In our considered opinion, as there should not be any disparity between cost-plus projects (u/s 62 of the Act) and competitively bid projects (u/s 63 of the Act), the said provision for participation under SCED shall also be allowed to generating companies under Section 63 of the Act.</b></p>

**DHARIWAL INFRASTRUCTURE LIMITED**

**Comments on CERC (Indian Electricity Grid Code) Regulations, 2022**

REGULATION	PROPOSED REGULATION	COMMENTS AND SUGGESTIONS
	<i>compensation, if any.</i>	
47(7)	<i>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:</i>	<b>In our humble opinion, Regulation 47(7) may be appropriately modified to allow generators the option to buy power from the Real Time Market in case of forced outages to maintain the schedule. Further generators may also be permitted to buy power from RTM when due to any constraints they are unable to meet the obligation of scheduled generation due to real time technical issues of coal quality etc. and have to incur penal DSM charges due to prolonged deviation from the schedule generation. This will improve the grid discipline as generators can arrange alternative power (only from RTM and not DAM) to meet the schedule instead of paying DSM charges.</b>
	<i>General</i>	<b>Apart from the present compensation for partial loading, there is need to offset the permanent damage caused to the equipment due to frequent thermal variations caused on account of frequent start/stops. Most thermal generating stations are designed as base load plants and frequent load cycling reduces the life of the plants. The Hon'ble Commission may kindly look into the same.</b>