



DIRECTORATE OF ENERGY, HIMACHAL PRADESH
SHANTI BHAWAN, PHASE-III, SECTOR-VI, NEW-SHIMLA, SHIMLA-171009

Telephone No. 0177-2673551 Fax No. 0177-2673553 Email-dir.doehp@nic.in

No.: GoHP/DOE/ Power-Sale/CERC /2022- 6481-82

Dated: 01/10/22

From

The Director,
Directorate of Energy.

To

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

Subject: CERC Draft Indian Electricity Grid Code Regulations 2022- comments thereof

Sir,

This is with reference to your office public notice no. No. L-1/265/2022/CERC, dated 07/06/2022 and No. L-1/265/2022/CERC dated 30th Aug 2022 vide which it has been requested to furnish the comments/objections/suggestions on the draft regulations i.e Indian Electricity Grid Code Regulations 2022 on or before 30th September 2022.

In this context, the comments/objections/suggestions on the subject cited matter is annexed at 'Annexure A' for your kind information and necessary action at your end please.

Yours faithfully,

DA:As above

Superintending Engineer (E)
Directorate of Energy,
GoHP, Shimla-9.

Copy of the above is forwarded to the Chief Secretary (Power) to the Government of Himachal Pradesh, Shimla-171002 for kind information, please.

Superintending Engineer (E)
Directorate of Energy,
GoHP, Shimla-9.

Comments on Draft Indian Electricity Grid Code Regulations 2022

Sr. No.	Clause	Comments
01	<p>Clause 22 Trial run of Generating Unit (2)</p> <p>(a) (iii) if it is not possible to demonstrate the MCR due to insufficient reservoir or pond level or insufficient inflow, COD may be declared, subject to the condition that the same shall be demonstrated immediately when sufficient water is available after COD.</p> <p>(b) Where on the basis of the trial run, a hydro generating unit fails to demonstrate the unit capacity corresponding to MCR, the generating company shall have the option to either de-rate the capacity or to go for repeat trial run. If the generating company decides to de-rate the unit capacity, the de-rated capacity in such cases shall be not more than 90% of the demonstrated capacity to cater for primary response.</p> <p>Clause 27 Declaration of Commercial operation (DOCO) and Commercial Operation Date (COD)</p> <p>(1) (b) Hydro Generating Station (i) The commercial operation date in case of a unit of the hydro generating station including pumped storage hydro generating station shall be the date declared by the generating station after successful trial run at MCR or de-rated capacity as per Regulation 22(2) (b), as the case may be, and submission of declaration as per Regulation 26(2) of these regulations. (ii) In case of the generating station, the COD of the last unit of the generating station shall be considered as the COD of the generating station.</p> <p>(2) Scheduling of generating station or unit thereof shall start from 0000 hours of the Commercial Operation Date of the said generating station or unit thereof.</p>	<p>Due to non availability of inflow in lean season, the CoD can be declared. It is submitted that at the time of trail run when sufficient water is available if any eventuality occurs and the project could not achieve the MCR or de-rated capacity then the earlier declared CoD by project developer should be ceased and afresh CoD may be issued after achieving the MCR.</p> <p>Whenever CoD declared by the generating station during lean season due to insufficient water, there will be the possibility that the generating station could not achieve the MCR or conduct the trial run in high inflow season. It is submitted that reliability and safety of the project could not be assessed in case project is not operated in its full load capacity and with overloading capacity. It should be mandatory to conduct the trail run with full load or MCR, when sufficient water available or within one year, whichever is earlier, with respect to CoD declared by generating station. In the event, mandatory trail run is not performed within said timelines then the project should not be allowed to schedule the power keeping in view the safety of the project.</p>
02	<p>Actual Drawl definition be included under definition</p>	<p>The definition of Actual Drawl will be included in the definition i.e. Actual Drawl: means the drawl recorded by interface meter at interface point of STU & CTU network.</p>