



54031/2022 / CRU CERC

# NATIONAL SOLAR ENERGY FEDERATION OF INDIA

Regd. No. 362 / IV of 8 May, 2013

## भारतीय सौर ऊर्जा महासंघ

पंजीकरण नं 362 / IV - 8 मई, 2013

Ref: NSEFI/CERC/2022-23/0104

Dated: 31.08.2022

To,  
**Shri. Harpreet Singh Pruthi**  
Secretary  
Central Electricity Regulatory Commission  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building,  
36, Janpath, New Delhi- 110001

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

Dear Sir,

We sincerely appreciate Govt. of India's and CERC's effort in providing conducive regulations and policies in promoting Renewable sources of energy. We are grateful for your continued guidance, and assurance you have offered, by enabling a robust and healthy policy environment to thrive in the country.

We would like to thank you for the opportunity to raise our key concerns & suggestions on the aforementioned subject. We have enclosed our comments and suggestions on the matters pertaining to, in the attached document. We believe that our comments will be helpful to aligning the CERC (Indian Electricity Grid Code) Regulations, 2022 with the objective of easy access to system integrity and network operation.

We are sure that our suggestions on the issues described in the attached document, will restore sound, strategic market balancing decisions. We are undertaking multiple stakeholder consultation on this important piece of regulation and would be keen to provide more suggestions/inputs with the Hon'ble Commission in due course.

We shall be happy to provide any further information as deemed necessary by the hon'ble commission.

Thank you for your understanding, support and consideration.

With Best Regards



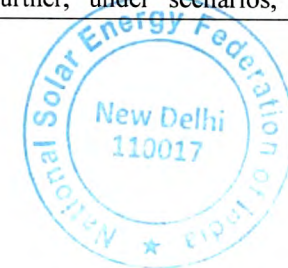
**Subrahmanyam Pulipaka**  
Chief Executive Officer  
National Solar Energy Federation of India

**Comments on Draft Indian Electricity Grid 2022**

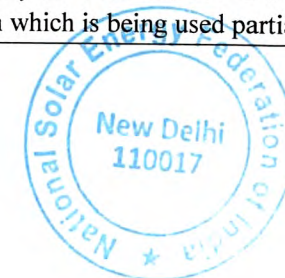
<b>Sl. No.</b>	<b>Clause No.</b>	<b>Existing Clause</b>	<b>Proposed Clause</b>	<b>Rationale</b>
1.	Chapter 1:  Definition	Ramp Rate' - means rate of change of a generating station output expressed in %MW per minute;	Ramp Rate' - means rate of change of a generating station output expressed in %MW per minute;	Ramping support from thermal generation would be an important attribute considering the large-scale renewable integration and changing load shape. Although, the CEA standards prescribe +/-3% per minute ramp rate, the IEGC has provisions mentions only +/-1% per minute ramp rate only. as per the Power System Operation Corporation Limited Analysis report dated April 2019, on " <i>Analysis of Ramping Capability of Coal-Fired Generation in India</i> " actual ramping provided by many generators are less than +/- 1%.
2.	Chapter 1:  Auxiliary Energy Consumption (Additional insertion)	Additional Insertion	'Auxiliary Energy Consumption' or 'AUX' in relation to a period in case of a generating station / ESS means the quantum of energy consumed by auxiliary equipment of the generating station / ESS, such as the equipment being used for the purpose of operating plant and machinery including switchyard of the generating station / ESS and the transformer losses within the generating station / ESS, expressed as a percentage of the sum of gross energy generated at the generator terminals of all the units of the generating station;	'Auxiliary Energy Consumption' definition need to be inserted as regulation is referring the Auxiliary Consumption at many places.



			<p><b>Provided that Auxiliary Energy Consumption, in case of ESS, shall not include cycle loss occurred during charging and discharging of ESS.</b></p> <p>Provided that auxiliary energy consumption shall not include energy consumed for supply of power to housing colony and other facilities at the generating station and the power consumed for construction works at the generating station and integrated coal mine.</p>	
3.	Chapter 1 :  Deemed ISTS Line (Additional insertion)	Additional Insertion	"Deemed Inter-State Transmission System (Deemed ISTS)" means the transmission system utilised to evacuate at least 75% of interstate power. Such transmission system should have received regulatory approval of the Commission as being used for interstate transmission of power and qualified the ISTS status from respective regional power committee.	There are many instances wherein transmission line being developed by State Transmission Utilities (STUs) or Intra State transmission licensees, and such transmission lines are mainly utilised to evacuate the Inter-State Power. Such transmission lines / system should be qualified as deemed ISTS under CERC IEGC Grid Code.
4.	Chapter 2:  Resource Adequacy Planning  5 (3)	Additional Insertion	(C) Each Distribution Licensee shall have a responsibility to assess the Energy Storage requirement in different time horizons, namely long term, medium term, and short term. Additionally, while assessing the generation resource adequacy, distribution licensee has to	Ministry of Power (MoP) vide its order dated 22 <sup>nd</sup> July, 2022 has issued Renewable Purchase Obligation (RPO) and Energy Storage obligation (ESO) trajectory till 2029-30. Hence, while Generation resource planning / demand forecasting, distribution licensees must access the requirement of ESS in long term, medium term as well as short term period. Further, under scenarios, wherein



	Generation Resource Adequacy Planning:		ensure that ESS has to be utilised to store the over generation capacity during certain time periods. Under such scenario, such stored energy shall be utilised later as per requirement.	distribution licensee anticipates any excess generation from RE resource, instead of curtailing, the same can be stored and utilised during non-RE hours.
5.	Chapter 2:  Resource Adequacy Planning  5 (3)  Generation Resource Adequacy Planning:	For the sake of uniformity in approach and in the interest of optimality in generation resource adequacy in the States, FOR may develop a model Regulation stipulating inter alia the methodology for generation resource adequacy assessment, generation resource procurement planning and compliance of resource adequacy target by the distribution licensees.	For the sake of uniformity in approach and in the interest of optimality in generation resource adequacy in the States, FOR may develop a model Regulation stipulating inter alia the methodology for generation resource adequacy assessment, generation resource procurement planning and compliance of resource adequacy target by the distribution licensees and levy of penalty for non-compliance of such target.	The referred clause stipulates the requirement to comply with generation resource adequacy assessment.  It has been seen in the past that distribution licensee is not complying with the RPO requirement, similarly, Distribution Licensee may forgo to comply with resource adequacy targets unless such non-compliance linked with strict penal charges.
6.	Chapter 2:  Resource Adequacy Planning  5 (4) (a) (V) Transmission deferral	Additional insertion under regulation 4 (a)	Transmission deferral – ESS derive most their value inter alia from averting the installation of excessive amounts of transmission infrastructure. CTU/STU should optimize transmission system requirement with co-located ESS, particularly while designing evacuation system for wind-solar projects located in such resource rich area.	Renewable energy sources have relatively limited utilization (expressed as C.U.F) (Solar ~25% & Wind ~30%) as against conventional sources particularly thermal sources where design utilization is typically 85%. Hence, the utilisation of the associated transmission asset is comparatively low. Since transmission assets are typically created to cater the peak power requirement. This issue assumes significance in case of India which has embarked on an accelerated RE capacity addition i.e. 500 GW by 2030. A transmission system which is being used partially



	(Additional insertion)		Transmission system for RE dense area shall be developed for lower peak and such energy may be stored in ESS for dispatch in non-RE hours.	have both technical and cost implications. In view of same, ESS needs to capture under Transmission resource adequacy assessment so that transmission system requirement can be deferred, and system would be optimally utilised.
7.	Additional Chapter incorporation  4 (C) Transmission adequacy planning code	Additional Chapter insertion	<p>It should cover the followings:</p> <ul style="list-style-type: none"> <li>• Dedicated transmission system for generation assets / PSPs, which are distantly far located from grid connection should be reduced to ~ 25 KM.</li> <li>• Advance strategic transmission planning needs to be carried out for PSPs to provide transmission system ahead of start date of operation of such assets.</li> <li>• Transmission planning should also cover transition process of LTA to GNA.</li> </ul>	<p>We suggest that a separate chapter covering transmission system adequacy planning code is required to be incorporated, and it should also cover the various methods needs to be adopted to enable the advance planning of transmission system in India.</p> <p>There is a strong consensus among the various stakeholders in the Indian power sector on need of energy storage assets in India. Pump Hydro Storage Plants are well recognised as a cost-effective long duration energy storage solution to mitigate the challenges of grid stability and curtailment of must-run RE generation.</p> <p>It is to be noted that generally such PSPs are located far from the nearest ISTS substation. In many cases the requirement of dedicated transmission line is beyond ~100 km. Therefore, it is need of hour to provide transmission system to all such PSPs at its doorstep.</p>
8.	Chapter 5:  Commissioning and Commercial Operation Code	<p>(3) Trial Run of Wind / Solar / Storage / Hybrid Generating Station</p> <p>(a) ..... corroborated with the solar irradiation</p>	<p>(3) Trial Run of Wind / Solar / Storage / Hybrid Generating Station</p> <p>(a) ..... corroborated with the solar irradiation recorded at site during the day and plant design parameters.</p>	Such condition is in contradiction with the condition mentioned in bidding documents being issued by the Central and State Government Implementing Agencies like SECI/NTPC/NHPC. Considering the same, we suggest not to incorporate the same.



	Clause 3 (a)	<p>recorded at site during the day and plant design parameters.</p> <p><b>For the trial run, a declaration shall be given by the generating company that no panel has been replaced or added or taken out or design of the plant has been altered:</b></p>	<p><b><del>For the trial run, a declaration shall be given by the generating company that no panel has been replaced or added or taken out or design of the plant has been altered:</del></b></p>	
9.	<p>Chapter 5: Commissioning and Commercial Operation Code</p> <p>Clause 22 3 (f)</p>	<p>(f) Where on the basis of the trial run, solar / wind / storage / hybrid generating station fails to demonstrate its rated capacity, the generating company shall have the option to either to go for repeat trial run or de-rate the capacity subject to a minimum aggregated de-rated capacity of 50 MW. 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</p>		



		capacity to cater for primary response.		
10	Chapter 6:  Operating Code  Clause 30 (4) Control Hierarchy	(9) Inertia:  The power system shall be operated at all the times with a minimum inertia to be stipulated by NLDC so that minimum nadir frequency post reference contingency stays above the threshold set for under frequency load shedding (UFLS). NLDC shall reschedule generation including curtailment of wind, solar and wind-solar hybrid generation, if required, in coordination with the respective RLDCs and SLDCs to maintain the minimum inertia.	(9) Inertia:  The power system shall be operated at all the times with a minimum inertia to be stipulated by NLDC so that minimum nadir frequency post reference contingency stays above the threshold set for under frequency load shedding (UFLS). NLDC shall reschedule generation including curtailment of wind, solar and wind-solar hybrid generation, if required, in coordination with the respective RLDCs and SLDCs to maintain the minimum inertia.  <b>Provided that curtailed wind, solar and wind-solar hybrid energy shall be given deemed generation status.</b>  <b>Provided further that NLDC shall implement the transparent process for data posting related to curtailment of wind, solar and wind-solar hybrid energy to ensure that such curtailment with reason of grid security will be corroborated.</b>	It has been seen in past that wind and solar generators connected with state grid have been facing frequent backing down instructions citing grid security and many such instructions are issued verbally without any written communications, and APTEL has also recognised the same in its order vide APPEAL NO. 197 of 2019 & IA NO. 1706 of 2019 dated 2nd August 2022, wherein it has directed that such state agencies shall pay the compensation during which curtailment instruction were issued for the reason other than grid security, at the PPA tariff along with interest.  In view of same, it is requested to allow deemed generation status/ compensation mechanism for curtailing wind, solar and wind-solar hybrid energy as such generators is losing revenue under such events and such provisions restrict developers.

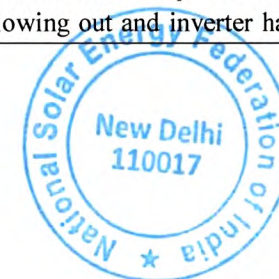


			<b><u>Provided further that RE generators shall be provided compensation for generation loss in a particular time-block based on wind speed/ solar insolation level in that time-block</u></b>	
11	Chapter 6:  Operating Code  Clause 30 (10) E – Primary Control	NLDC may also identify other resources such as ESS and demand resource to provide PRAS for which PRAS Providers shall be compensated in accordance with the Ancillary Services Regulations.	Clarification required in the said clause	CERC Ancillary Service regulation 2022 does not have provision related to compensation of Primary Reserve Ancillary Service.  It is requested to clarify under such scenario, how Primary Reserve Ancillary Service provider will be compensated.
12	Chapter 5:  Operating Code  Clause 30 (10) h	(h) All generating stations mentioned in Table-4 (under clause (g) of this Regulation) shall have the capability of instantaneously picking up to a minimum 105% of their operating level and up to 105% or 110% of their MCR, as the case maybe, when the frequency falls suddenly and shall provide primary response. Any generating station not complying with the above requirements	(h) All generating stations mentioned in Table-4 (under clause (g) of this Regulation) except <b><u>Wind/Solar/Renewable Hybrid Energy Project</u></b> shall have the capability of instantaneously picking up to a minimum 105% of their operating level and up to 105% or 110% of their MCR, as the case maybe, when the frequency falls suddenly and shall provide primary response. Any generating station not complying with the above requirements shall be kept in operation (synchronized with the regional grid) only after obtaining the permission of the concerned RLDC.	It is to be noted that Wind/Solar/Renewable Hybrid Projects do not have capability to operate at 105% or 110% of operating level when Solar insolation / Wind speed is not available at site. Moreover, MCR should not be applicable for RE.  In view of same, 105% or 110% of MCR would be applicable on Thermal and Hydro units only and not on the wind, solar and hybrid of wind and solar projects.





		shall be kept in operation (synchronized with the regional grid) only after obtaining the permission of the concerned RLDC.		
13	Chapter 6: Operating Code Clause 30 (11) (U)	All renewable energy generating stations and ESS shall be enabled with <b>frequency controller</b> to provide secondary control in accordance with the CEA Connectivity Standards and the communication system shall be established in accordance with the CEA Technical Standards for Communication.	Clarification required in the said clause	It is requested to clarify, whether it is mandatory requirement which RE generator /ESS are bound to comply as under CERC Ancillary Service Regulation 2022, SRAS/TRAS is to be provided on voluntary basis.
14	Chapter 6: Operating Code Clause 40 (3). FIELD TESTING FOR MODEL VALIDATION	TABLE 9: TESTS REQUIRED FOR POWER SYSTEM ELEMENTS....	Clarification required in the said clause	Please clarify whether these tests are mandatory to comply for existing projects? We understand that all future projects are required to comply before commissioning.  Please clarify.
15	Chapter 7: Scheduling and Despatch Code	Additional Insertion	During high Solar isolation period, and if inverters have margin to increase solar	Solar Projects are generally installed with high DC capacity and there may be scenarios wherein power limited to contracted capacity is flowing out and inverter having an



	(45) 10)  Optimum Utilization of Hydro Energy and Solar Energy		generation by 5 to 10% of capacity, the same should be allowed.	inherent margin of 5 to 10% beyond the rated capacity. We request that the same should be allowed to inject like hydro power plant in case of high insolation period or shortage scenario.
16	Chapter 7: Scheduling and Despatch Code  45 (11) (b) Scheduling of renewable energy generating station by QCA	NLDC shall notify a procedure for aggregation of pooling stations for the purpose of combined scheduling and deviation settlement for wind or solar or renewable hybrid generating stations within six (6) months of notification of these regulations.	NLDC shall notify a procedure for aggregation of pooling stations and <b>at regional level</b> for the purpose of combined scheduling and deviation settlement for wind or solar or renewable hybrid generating stations within six (6) months of notification of these regulations.  Provided further that aggregated deviation at regional level shall be charged from such Wind and Solar Generator on proportionate to their individual deviation.	We agree with the proposed Regulation. State level aggregation of schedule by a QCA is implemented by Karnataka and , Andhra Pradesh. . States follow one of the three levels of aggregation of scheduling i.e., plant-level, pooling station-level, and State-level. This specific element of the regulations has material implications for long term viability of RE projects in India. Hence, it is critical that relevance of ‘Aggregating schedule of pooling substations by QCA at regional level is very much required.  It is to be noted that the forecasting of RE projects is technically constrained because of the two reasons –  (i) limited accuracy of weather forecasting models, and  (ii) limited spatial resolution available. In such circumstances, RE projects face uphill task to comply with DSM regulations  and absence of aggregation of schedule of various pooling substations



				at regional level by QCA at regional leaves RE project unreasonably exposed to penalty.
17	<p style="text-align: center;"><b>Germany – Renewable integration and aggregation model</b></p> <p>Germany is one of the market leaders in renewable energy deployment in EU and globally. In Germany, the share of solar and wind generation sources in the installed net power generation capacity has gone beyond 50%. The higher share of the installed RE capacity is driven by government incentives and the must run status given to RE generators.</p> <p>In Germany, the maximum voltage transmission grid is owned by four transmission system operators (TSOs). It is their job to regulate the power supply, including <b>balancing fluctuating power from renewables with more predictable conventional generation</b>. Power suppliers must pay the TSOs a “grid fee” for the use of their network. The grid fee also covers the cost of operating the grid and keeping it stable, including voltage and frequency control.</p> <p><b>All electricity generators, including RE generators, and consumers are assigned to a balancing group in Germany, and there are multiple balancing groups within each TSO. The balancing groups are not in charge of physically balancing the system (i.e., it is not a control area). Rather they are entities that aggregate the schedules from multiple generators and consumers and schedule resources accordingly.</b></p> <p>There is a financial settlement between the TSOs and balancing groups, which depend on the actual deviations from their schedule. <b>Hence, the balancing groups have an incentive to balance resources internally to avoid being exposed to the balancing market operated by the TSO<sup>1</sup>. The Balancing groups are essentially aggregators like QCAs in India.</b> The error in schedules by RE generators under a balancing group gets minimized due to averaging of individual errors by each RE generator.</p> <p>The operators of electricity supply grids are obliged to maintain a balancing group which exclusively comprises energy that is remunerated with a feed-in tariff from RE suppliers in the grid area for transmission to the balancing group of the operators of transmission grids.</p>			

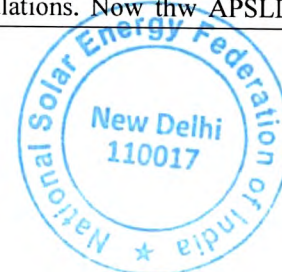
<sup>1</sup> Source - Report from US Department of Energy



18	<p>Chapter 7: Scheduling and Despatch Code</p> <p>Clause 11 (F)</p> <p>Scheduling of renewable energy generating station by QCA</p>	<p>Any dispute arising between the generating stations and QCA shall be resolved in accordance with the mechanism in the contracts entered into between them.</p>	<p>Any dispute arising between the generating stations and QCA shall be resolved by the appropriate Commission.</p>	<p>It is to be noted that the QCA is not an entity recognised under the Act. DSM Regulation of States have recognised the concept of QCA. Now the Hon'ble Commission has proposed to be recognised though IEGC. Therefore, any commercial impact on account of deviation is fastened to the generator or QCA, which is representing group of generators. However, QCA has no obligation to bear financial consequences and it will only pass on to the generators. Therefore, only generator is liable. This is clearly contrary and in violation to the Section 28 (4) of the Act which clearly states that the Regional Load Despatch Centre may levy and collect such fee and charges from the generating companies or licensees engaged in inter-State transmission of electricity as may be specified by the Central Commission. QCA require to be registered with the concerned RLDC. The Hon'ble Commission is requested to notify qualifying criteria, net worth, creditworthiness etc. Moreover, any dispute resolution between Generating Station/QCA should be under the jurisdiction of CERC.</p> <p>If the QCA is not capable for any payment due to RLDC, could be possible that it might not have received from the generator, RLDC may not allow such QCA to schedule power without payment of past dues. In such case other generators should not be suffered. Therefore, strict qualifying criteria and bringing QCA under the ambit of Hon'ble Commission is necessary.</p>
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19	<p>Chapter 7: Scheduling and Despatch Code</p> <p>12) Minimum turndown level for thermal generating stations</p>	<p>The minimum turndown level for operation in respect of a unit of a regional entity thermal generating station shall be 55% of MCR of the said unit:</p> <p>Provided that the Commission may fix through an order a different minimum turndown level of operation in respect of specific unit(s) of a regional entity thermal generating station:</p> <p>Provided further that such generating station on its own option may declare a minimum turndown level below 55% of MCR:</p>	<p>The minimum turndown level for operation in respect of a unit of a regional entity thermal generating station shall be 55% or 40% of MCR of the said unit:</p> <p>Provided that the Commission may fix through an order a different minimum turndown level of operation in respect of specific unit(s) of a regional entity thermal generating station:</p> <p>Provided further that such generating station on its own option may declare a minimum turndown level below 55% or 40% of MCR:</p>	<p>It is to be noted that in accordance with Draft Central Electricity Authority (Flexible operation of thermal power plants) Regulations, 2022, the appropriate Load Despatch Centres shall be allowed to schedule all coal based thermal power plants, up to the Minimum Power Level (MPL) of 40%, to support the operation of must run stations.</p> <p>Further, it also specified that minimum loading or unloading shall be 3% per minutes above the MPL and in case of super critical and ultra-super critical units, it shall be 5 %.</p> <p>Hence, it is requested that same should be reflected in the CERC IEGC regulation.</p>
20	47 (1) ®	<p>.....</p> <p>Provided that the renewable energy generating stations shall not be subjected to merit order despatch, and subject to technical constraints shall be requisitioned</p>	<p>Wind , solar, wind-solar hybrid with or without storage , standalone storage drawing power from renewable energy sources and hydro power plant (in case of excess water leading to spillage) shall be treated as MUST RUN power plants and should not be subjected to curtailment due to merit order despatch as well as due to any commercial consideration.</p>	<p>It is requested that the existing Regulation 5.2 (u) of the IEGC should be retained. Wind and solar generators in the state of Andhra Pradesh, Tamil Nadu, Madhya Pradesh, Karnataka face severe backing down due to commercial reason in the past. The Regulation 5.2 (u) supported the RE generators in reducing the curtailment drastically. Hon'ble APTEL in its judgement on deemed energy compensation on curtailment in the Appeal No 197 of 2019 also took shelter of the said Regulations. Now thw APSLDC and</p>



		<p>first followed by requisition from other generating stations in merit order.</p>	<p>In the event of transmission constraint or system security constraint renewable energy generation may be curtailed after harnessing flexible resources including energy storage systems.</p> <p>In the event of extreme circumstances, when MUST RUN plant has to be curtailed, the details shall be published on the RLDC/SLDC website the following day, as the case may be, giving the date, name of RE generation plant, installed capacity, curtailment quantum in MWh, duration of curtailment and reasons thereof.</p>	<p>TANTRANSCO has challenged the said APTEL judgement in the Hon'ble Supreme Court, we request the Hon'ble Commission to retain the said Regulation.</p>
21	<p>Chapter 7: Scheduling and Despatch Code</p> <p>Power to revise schedule 47 (3) (a) (ii) (a)</p>	<p>Within transactions under GNA, curtailment shall be done first from generation sources other than wind, solar, wind-solar hybrid and run of the river hydro plants with upto three hours pondage (in case of excess water leading to spillage), on pro rata basis based on their GNA quantum.</p>	<p>Within transactions under GNA, curtailment shall be done first from generation sources other than wind, solar, wind-solar hybrid and run of the river hydro plants with upto three hours pondage (in case of excess water leading to spillage), on pro rata basis based on their GNA quantum.</p> <p><b>Provided further that curtailed generation based on Wind, Solar, and Wind-Solar hybrid with and without Storage, shall be considered as deemed generation and compensated to</b></p>	<p>It has been seen in past generators connected with state grid have been facing frequent backing down instructions citing grid security and many such instruction are issued verbally without any written communications, and APTEL has also recognised the same in its order vide APPEAL NO. 197 of 2019 &amp; IA NO. 1706 of 2019 dated 2<sup>nd</sup> August 2022, directed that such state agencies shall pay the compensation for during which curtailment instruction were issued for the reason other than grid security, at PPA tariff along with interest.</p> <p>In view of same, it is requested to allow deemed generation status/ compensation mechanism for curtailing wind, solar</p>



			<b>generator by its procurer at PPA tariff.</b>	and wind solar hybrid energy as such generators is losing revenue under such events.
22	Chapter 7: Scheduling and Despatch Code  Clause 47 (4) (c)	<p><b>(4) Revision of schedules on request of regional entities:</b></p> <p>(a) SLDCs, regional entity generating stations, regional entity ESSs, beneficiaries, 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>(c) Based on the request for revision in schedule made as per sub-clauses (a) and (b) of Clause 4 of this Regulation, any revision in schedule made in odd time blocks shall become effective from <b>7th time block</b> and any revision in schedule made in even time blocks shall become effective from <b>8th</b></p>	<p>(c) Based on the request for revision in schedule made as per sub-clauses (a) and (b) of Clause 4 of this Regulation, any revision in schedule made in odd time blocks shall become effective from <b>3rd time block</b> and any revision in schedule made in even time blocks shall become effective from <b>4th time block</b>, counting the time block in which the request for revision has been received by the RLDCs to be the first one.</p>	<p>In current regulatory framework, wind and solar generators are being allowed to revise its schedule and such revision shall become effective from the 4<sup>th</sup> time block, 1st block being the block in which notice has been given. Moreover, one revision for each time slot of one and half hours starting from 00:00 hours of a particular day subject to maximum of 16 revisions during the day. Hon'ble Commission in Statement of Reasons (SOR) order issued while notifying the DSM Regulations, 2014, observed as under:</p> <p><i>5.3 Decision of the Commission:</i></p> <p><i>5.3.1 The Commission has taken note of the comments. On the issue of frequency of revisions, the Commission recognizes that accuracy of forecasting improves as one gets closer to time of dispatch. This is borne out by plenty of research that is available on how forecasting accuracy improves as more updates are done aligned with shorter scheduling intervals. In the publication, "A Review 20 of Variable Generation Forecasting in the West, Widiss et al, NREL, July 2013-Jan 2014", 14 Operating Entities (OEs) in the Western Interconnection in the United States were interviewed. Nearly all OEs were reported to have hour-ahead forecasts, the frequency of updating varying from every 10 minutes to hourly. The chart below, prepared by Alberta Electric System</i></p>



		<p><b>time block</b>, counting the time block in which the request for revision has been received by the RLDCs to be the first one.</p>		<p><i>Operator (AESO), illustrates improving accuracy with decreasing forecast horizon:</i></p> <p>.....</p> <p><i>Most stakeholders have supported the proposal of doubling the number of revisions allowed, to 16 per day. Some have suggested even further increase to enable hourly revisions. The Commission is of the view that while increasing frequency of revision would enhance forecasting accuracy, it might be difficult for beneficiaries to manage contracts due to very frequent revisions. As such, the Commission has decided to retain the number of proposed revisions to 16. ...."</i></p> <p>It is submitted that the Hon'ble Commission was also in agreement that the increasing frequency of revision would enhance forecasting of accuracy. Considering the above observation, we request the Hon'ble Commission that the revision in schedule be made effective from 3<sup>rd</sup> and 4<sup>th</sup> time block.</p>
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