

एनटीपीसी विद्युत व्यापार निगम लिमिटेड (एनटीपीसी की पूर्ण स्यामित्व याली सहायक कम्पनी) NTPC Vidyut Vyapar Nigam Limited (A wholly owned subsidiary of NTPC) केन्द्रीय कार्यालय/ Corporate Centre

# Ref: NVVN/BD/CERC/IEGC/01/31102022

Date: 31.10.2022

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

Sub: NVVN's comments on Draft IEGC Grid Code Regulations 2022 published by Hon'ble CERC.

### **Respected Sir**

Please find enclosed herewith NVVN's comments on Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2022.

**Encl: As Above** 

**Yours Sincerely** 

For & On behalf of

NTPC Vidyut Vyapar Nigam Limited



Prasanta Kanjilal Sr. Manager (BD)

सातवॉ तल, कोर–3, स्कोप कॉम्प्लेक्स, 7 इन्स्टीट्यूशनल एरिया, लोधी रोड, नई दिल्ली–110 003. टेल/Tel : 011-24369565/8286, 24387735/7451, फैक्स/Fax : 011-2436 2009 7<sup>th</sup> Floor, Core-3, SCOPE Complex, 7, Institutional Area, Lodi Road, New Delhi–110 003. वेबसाइट/Website : www.nvvn.co.in



एनटीपीसी विद्युत व्यापार निगम लिमिटेड (एनटीपीसी की पूर्ण स्वामित्व वाली सहायक कम्पनी) NTPC Vidyut Vyapar Nigam Limited (A wholly owned subsidiary of NTPC)

केन्द्रीय कार्यालय/ Corporate Centre

## Comments of NVVN on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2022

### **1.0 Requirement for Commencement of Scheduling:**

### Clause no. 45(5)(a)(iv)

"Copies of the valid contracts by the sellers and the buyers, for transactions other than collective transactions."

#### NVVN's comment (s):

As per clause 45(5)(a)(iv) as mentioned above, it is submitted that for bilateral contracts through trading licensee against tenders published by DISCOMs in DEEP portal - many PPA are approved at a much later date compared to actual start of scheduling. Therefore, for fulfilment of submission of valid contract(s) document to the respective RLDC before commencement of scheduling under GNA/T-GNA,LOA issued by buyers to trading licensee/authorisation letter issued by generator to trading licensee be accepted as a valid proof of contract for scheduling of power when trading licensee is applying for corridor to RLDC.

#### 2.0 Procedure for scheduling and despatch for inter-state transactions:

#### Clause no- 47(1)(d)

The requisition for cross-border schedule along with its breakup from various sources shall be submitted by Settlement Nodal Agency (SNA) for 0000 hours to 2400 hours of the 'D' day, by 7 AM on 'D-1' day

#### NVVN's comment(s):

At present, scheduling requisitions for cross border supply are submitted by LTA/MTOA allotees individually (now converted to GNA) to RLDC and RLDC compiles and prepare the above schedule and send the combined schedule for cross border entity. It is requested that the same process should continue after grid code amendment.



सातवॉ तल, कोर–3, स्कोप कॉम्प्लेक्स, 7 इन्स्टीट्यूशनल एरिया, लोधी रोड, नई दिल्ली–110 003. टेल/Tel : 011-24369565/8286, 24387735/7451, फैक्स/Fax : 011-2436 2009 7<sup>th</sup> Floor, Core-3, SCOPE Complex, 7, Institutional Area, Lodi Road, New Delhi–110 003. वेबसाइट/Website : www.nvvn.co.in