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Letter.No.: NPL/CD/JU/CEA/SEC/221031/2

31.10.2022

**Secretary – CERC,
4th Floor, Chanderlok Building
36, Janpath,
New Delhi-110001**

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

Ref: Public notice No L-1/265/2022/CERC dated 29.09.2022

Dear Sir,

With reference to your above-mentioned notice, please find comments on behalf of Nabha Power Limited (NPL), which owns and operates 2 X 700 MW Coal fired Thermal Power Plant at Rajpura, Punjab as show below:

NPL Comments/ Suggestions
<p style="text-align: center;">General Comments</p> <ul style="list-style-type: none">• Clause 34: System Restoration: Sufficient time gap of minimum 10 Hrs should be provided between synchronization of any two units of power station so as to ensure stability of both the units, as auxiliary power is being consumed by first unit during the synchronization.• Clause 34: System Restoration: As some auxiliaries are required to be kept in operation during shutdown/start-up, Genco should be compensated against the additional start-up power costs incurred due to Reserve Shutdown of its power station on account of low demand/station blackout.• Clause 45: General Provisions: As per grid code RLDC shall ask each generating station, at least once in a year, to demonstrate the declared capacity. Currently no detailed procedure or guidelines have been provided regarding requirement to demonstrate declared capacity by Genco when directed by RLDC/SLDC. The Genco should be allowed to demonstrate the declared capacity based on design parameters.• Clause 45: General Provisions: The penal provisions added in grid code regarding mis-declaration of declared capacity are arbitrary and excessive. The proposed penalties of corresponding to two days fixed charges at normative availability on first

mis-declaration and four days fixed charges on second mis-declaration with geometric progression increase in charges for subsequent mis-declarations are exorbitant. The penalty clause should be reduced and should only be levied in case on intentional misdeclaration done by a generator to make an undue commercial gain and not on unintentional misdeclaration such as GCV variation of fuel for a short period of time should not be considered as mis-declaration.

- **Clause 45 (9): General Provisions:** Ramp-up and ramp down rate should be as per design parameters as per OEM. Ramp up or ramp down rate of not less than 1% of ex-bus capacity provision should be applicable for thermal units running above safe load i.e., operating without any secondary fuel support.
- **Clause 45 (9): General Provisions:** The provisions of the 4th Amendment to IEGC dated 06.04.2016 which stipulates compensation for generating stations for degradation of Heat Rate, Auxiliary Compensation and Secondary Fuel Oil Consumption due to part load operation and multiple start-ups of units needs to be retained and the same should be allowed to all Genco including IPPs by the respective ERCs.
- **Clause 47: Procedure for Scheduling and Dispatch for inter-state transactions:** Whenever it is required to reduce load or unit shutdown for testing, retrofitting and combustion tuning etc. as a part of feasibility study for generating plant, availability of the Genco should be considered as declared by Genco.

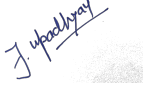
Technical Comments

- **Clause 30: Frequency Control and Reserves:** For testing and trending the turbine efficiency, valve wide open (VWO) operation (for duration of 2-3 hour) needs to be carried out periodically as a standard operational practice in power plants. Therefore, valve wide open Operation should be allowed for specific periodic test for turbine. The duration and periodicity may be guided in Grid Code. Also, RGMO performance (PRAS) may not be achieved during VWO testing as governing reserve is not available, hence, such cases should be excluded under mandatory RGMO compliance.
- **Clause 30: Frequency Control and Reserves:** Power plants liked NPL which are based on super-critical technology and were designed for washed Indian coal (higher GCV range) are now running on ROM coal presents operational challenges due to coal flow being much higher than design such as low MS temperature etc. Under such conditions of poor coal quality, RGMO demand (PRAS) is not met up to satisfactory level. Such cases should be excluded under mandatory RGMO compliance.
- **Annexure -2 General Reserve Estimation and Frequency Control:** Ex bus data received at SLDC/NLDC does not have resolution of 1 second (standard practice is 10 seconds), hence RGMO performance declared and communicated by SLDC is less than actual. Generation data at DCS is more accurate (resolution of 1 second). Therefore SLDC/NLDC should ask for generation data from DCS at generation side for accurate calculation of RGMO performance and thereafter, non-compliance letter/communication should be issued to generation plants. A mechanism for above process may be defined in PRAS section of Grid Code

This is for your kind consideration, please.

Thanking you,

For Nabha Power Limited

A handwritten signature in blue ink, appearing to read 'J. Upadhyay', is written over a rectangular grey stamp or seal.

(Authorized Signatory)