

To

Secretary,
Central Electricity Regulatory Commission,
3rd & 4TH Floor, Chanderlok Building, 36, Janpath,
New Delhi.

Dated 2^o/10/2022

Sub:- Seeking comments/suggestions 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 & No L-1/265/2022/CERC, Dated 29-09-2022.

The comments/suggestions on draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations 2022 are as stated below.

Provisions in regard to draft IEGC Regulations (chapter-1 Clause (2). Sub Clause (3)

"The generating stations of the Bhakra Beas Management Board (BBMB) and Sardar Sarovar Project (SSP) shall be treated as regional entities and their generating units shall be scheduled and dispatched in coordination with BBMB or Narmada Control Authority, as the case may be, having due regard to the irrigation requirements of the participating States"

Provisions in existing IEGC Regulations 2010 (Part-1, Clause (1.3) Sub clause (iii)

"For the purpose of the IEGC, the generating stations of the Bhakra Beas Management Board (BBMB) and Sardar Sarovar Project (SSP) shall be treated as intra-State generating stations, though their transmission systems shall be a part of the ISTS. This is because of the fact that only some of the States of Northern Region/ Western Region have a Share in BBMB/SSP, and their generating units have to be scheduled and dispatched in a very special manner (in coordination with the irrigational requirements). The scheduling and dispatch of the BBMB/SSP generation shall continue to be the responsibility of the BBMB/ Narmada Control Authority (NCA), with a provision that it shall be duly coordinated with the respective Regional Load Dispatch Centre and the beneficiaries."

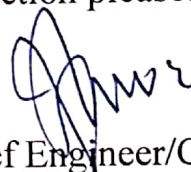
Presently water releases from Bhakra Dam and Pong Dam under the control of BBMB are governed by Irrigation and drinking water requirements of partner states including Punjab. Power is generated as a byproduct according to quantum of water being released. Thus irrigation and drinking water requirements are given priority over demand of Power which is very essential for running 14500 Km long canal network of Punjab having its own constraints.

However in the draft IEGC regulation, scheduling and dispatch of BBMB power houses is implied to be shifted from BBMB to Regional Load Dispatch center. This might be detrimental to BBMB and Partner States water conduct system as concerned agency NRLDC may not be conversant with real time hydraulic and civil constraints of the Canal Network. Real time consideration/explanation in such scenario can lead to loss of precious time and damage to water conduct system.

It is further stated that BBMB has been constituted as per the provisions of Punjab Reorganization Act for administration, operation and maintenance of Bhakra and Beas Projects on behalf of Partner states as such coordination with BBMB beneficiaries including Punjab is required as is provisioned in existing IEGC Regulations.

Therefore, it is requested that the above mentioned concerns may please be considered and provisions in existing IEGC Regulations in regard to scheduling and dispatch of BBMB generating stations may be continued in future also.

Observations are forwarded for information and necessary action please.



Chief Engineer/Canals-1,
Water Resources Department,
Punjab, Chandigarh.

CC:- Principal Secretary, Water Resources Department, Punjab, Chandigarh for information.