

**Comments on
CERC (Indian Electricity Grid
Code) Regulations, 2022.**

28 (7)

Every generating station and transmission substation of 132 kV and above shall have a control room manned by qualified operating personnel round the clock. Alternatively, the same may be operated round the clock from a remotely located control room, subject to the condition that such remote operation does not result in delay in execution of any switching instructions and information flow:

Proposal:

Transmission sub station at voltage level of 110 KV and above shall be considered as the State of Karnataka having 110 KV substation

25(1) CERTIFICATE OF SUCCESSFUL TRIAL RUN

In case any objection is raised by a beneficiary in writing to the concerned RLDC with copy to all concerned regarding the trial run within two (2) days of completion of such trial run, the concerned RLDC shall, within five (5) days of receipt of such objection, in 49 coordination with the concerned entity and the beneficiaries, decide if the trial run was successful or there is a need for repeat trial run

Views:

Generating station without having PPA of any of the beneficiary, the modalities for certification of successful trial run may be specified

29(4)(5) - SYSTEM SECURITY

Except under an emergency, or when it becomes necessary to prevent an imminent damage to a costly equipment, no user shall suddenly reduce its generating unit output by more than 100 (one hundred) MW [20 (twenty) MW in case of NER] without prior permission of the respective RLDC. (5) Except under an emergency, or when it becomes necessary to prevent an imminent damage to a costly equipment, no user shall cause a sudden variation in its load by more than 100 (one hundred) MW without prior permission of the respective RLDC.

Views:

The term sudden reduce has not been defined and in the real time operation. 100 MW can be reduced in a minute or in a second is widely been argued. A reduction of 100 MW of power in a large grid of 15,000 MW has no technical relevance as far as the system security is concerned

30 - FREQUENCY CONTROL AND RESERVES

(2) The National Reference Frequency shall be 50.000 Hz and shall be measured with a resolution of +/-0.001 Hz. The frequency data measured at every second shall be archived by RLDCs.

Views:

The present deviation regulation-2022 not linked with frequency. Hence, same need more clarification

45 - GENERAL PROVISION

12. 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: 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: Provided further that such generating station on its own option may declare a minimum turndown level below 5

Views:

Procedure of Reserve shutdown is not specified

46 - Security Constrained Unit Commitment (SCUC)

4(b) Beneficiaries of such stations, whose units are likely to be scheduled below minimum turndown level for some or all time blocks of the D day shall be permitted to revise their requisitions from such stations by 16:30 Hrs of D-1 day, in order to enable such units to be on bar. The revised requisition from the said generating stations, once confirmed by the beneficiaries by 16:30 Hrs of D-1 day and further reduction in drawal schedule shall not be allowed from such stations for such time blocks

Views:

In real time there is variation in RE generation and DSM regulation -2022 has permitted deviated 10% ,hence there should be flexibility for reduction of drawal schedule for the DISCOMs. It will have huge financial impact.

47 - PROCEDURE FOR SCHEDULING AND DESPATCH FOR INTER-STATE TRANSACTIONS

1 (j)(i) Power Exchange(s) shall open bidding window for day ahead collective transactions from 10 AM to 11.30 AM of 'D-1' day.

Views

Power Exchange(s) shall open bidding window for day ahead collective transactions

B(i) Entitlement of each beneficiary or buyer: (i) For generating station, where Central Government has allocated power, each State shall be entitled to a MW despatch up to the State's Share in the station's declared capacity for the day. Accordingly, based on declared capacity of such generating station, RLDC shall declare entitled share of each beneficiary or buyer for 0000 hours to 2400 hours of the 'D' day, by 7 AM on 'D-1' day from 10 AM to **12.00 AM** of 'D-1' day.

Views:

The downward division shall be allowed for the RE rich State of Karnataka the accurate forecast of RE generation is not possible and Regulation provides for the deviation of the 10 / 15 % of the available capacity