

## **Comments on the implementation of market coupling**

- 5.2.5 The International experience highlighted in the discussion paper does not apply for our country as just 7% of total electricity volume is through power exchange. It would leave the 87% of market covered by PPA. If at all coupling has to succeed it necessarily needs to be combined with MBED.
- 5.3.2 The Power exchange for the last 15 years have done praise worthy work in terms of price discovery and savings to DISCOM. Their work should be appreciated. Just to cover up the weak players the stronger one need not be penalised.
- 5.4.1 The strongest player is in fact doing the market coupling and can be considered as default one in the present scenario by fulfilling 90% demand out of 7% of the total electricity traded. It should be allowed to remain so.
- 5.5.2 The dominant player has an excellent technological platform which has been vetted by 7500+ participants. It is one of their strong points which have enabled uninterrupted system running 24 x 7 x 365 and smooth flow of electricity to homes helping the country to sleep peacefully.
- 5.6.4 There has been no default by any participants on the payment due to the advance collection prior to supply. There also has been no default by exchange to the supplier. The CERC role as a regulator is to ensure that the smooth flow of electricity as well as the funds continue.
- 5.7.1 The Traders as well as the PPA parties should come under the MBED if the market coupling has to work efficiently.
- 5.8.6 It is suggested that coupling has to be adopted as atomic which means that either it should be done fully along with MBED or not done at all. Partial patch up work in the important area of electricity will not serve the purpose and will not have the desired outcome.

Sd/-

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