

Date: 15.07.2024

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

Sub: Submission of comments and suggestions on the proposed Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024.

Ref: Draft notification no. No. L-1/265/2022/CERC Dated: 12.06.2024

Dear Sir,

This has reference to the proposed Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024 published for stakeholder consultation vide notification no. No. L-1/265/2022/CERC Dated: 12.06.2024.

Accordingly, few suggestions on the aforesaid draft regulation are being submitted herewith (as per enclosed **Annexure**) on behalf of Adani Green Energy Ltd for kind consideration please.

Thanking you,

Yours faithfully,

For & Behalf of Adani Green Energy Limited



Ravi Sinha
Sr. Manager- Regulatory Affairs

Encl. As above

AGEL's COMMENTS & SUGGESTIONS ON IEGC FIRST AMENDMENT DRAFT

Sr. No.	Regulation	Proposed under 1 st Amendment Draft	AGEL Suggestion for consideration	Justification/ Rationale
1.	19. Drawal of start-up power and injection of infirm power	(b) Injection of infirm power shall not exceed one year from the date of first synchronization for generating stations <i>other than REGS and ESS.</i> (c) <i>Injection of infirm power shall not exceed 45 days from the date of FTC approval for REGS and ESS.</i>	(b) Injection of infirm power shall not exceed one year from the date of first synchronization for generating stations other than REGS and ESS. (c) Injection of infirm power shall not exceed 45 days from the date of FTC approval for REGS and ESS.	Existing provision of injection of infirm power till 1 year from the date of first synchronization to be continued for all generators, rather than limiting it to 45 days from First Time Charging for RE Generators. Rationale: <ul style="list-style-type: none"> There should not be any capping on the injection of infirm power in case of REGS/ESS as at times even after having FTC approval in place, there are situations where delay happens in 1st time charging because of various reasons (such as checks and fault etc.) beyond the control of the developer. Further, charging of individual elements of REGS/ESS (i.e. 220 KV line, 220 KV Bay, 33/220 KV transformers, 33 KV feeders, WTG and 33 KV unit Transformers etc.) takes place in phases wherein in case of Wind Project one 33 KV feeder involves 12-13 WTGs normally. In such cases, it usually takes 4-5 attempts in completion of charging of mere 100 MW capacity as such feeders are charged one by one progressively. And for large scale projects it will obviously take some more time.
2.		(3) Notwithstanding the provisions of clause (2) of this Regulation, the Commission may allow extension of the period for inter-change of power beyond the stipulated period on an application made by the generating station at least two months in advance of the completion of the stipulated period: <i>Provided that for REGS and ESS, extension of period for injection of infirm power beyond the stipulated period may be allowed (a) for a period up to six months by respective RLDC on an application(s) made by such generating station or ESS to respective RLDC along with detailed reasons, at least 10 days in advance of the</i>	(3) Notwithstanding the provisions of clause (2) of this Regulation, the Commission may allow extension of the period for inter-change of power beyond the stipulated period on an application made by the generating station at least two months in advance of the completion of the stipulated period: Provided that for REGS and ESS, extension of period for injection of infirm power beyond the stipulated period may be allowed (a) for a period up to six months by respective RLDC on an application(s) made by such	

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		<p><i>completion of the stipulated period, (b) for a period beyond six months by the Commission on an application(s) made by such generating station or ESS along with detailed reasons, at least 30 days in advance of the completion of the stipulated period.</i></p>	<p>generating station or ESS to respective RLDC along with detailed reasons, at least 10 days in advance of the completion of the stipulated period, (b) for a period beyond six months by the Commission on an application(s) made by such generating station or ESS along with detailed reasons, at least 30 days in advance of the completion of the stipulated period</p>	<ul style="list-style-type: none"> • Most of the REGS plant are charged and commissioned in parts/phases (in small packages of 50 MW or lower capacity) which in turn takes time in completion of trial run w.r.t. complete project capacity. • Even after charging of such part capacity, various checks of parameters are required to be done internally prior to going into trial operation which takes more time in corroborating the desired results which is quite essential to avoid any issue during actual trial run. • Accordingly, limiting of injection of infirm power up to 45 days is quite stringent and not practical to undergo and complete the successful trial run for entire capacity of a project. Hence, it is requested to continue with the existing regulation which allows 1 year. • Without prejudice to the above, as far as commercial sale of infirm power is concerned, it is submitted same is in line with the DSM Regulation 2022 which rather encourages sale of such infirm power and has indicated that it does not lead to any imbalance in the system incase of infirm power being scheduled to a buyer. Relevant abstract of the SOR dt 01.06.2022 issued in respect of DSM

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				<p>Regulation 2022 is reproduced below for ready reference: <i>"9.1. ...injection of infirm power without corresponding buyer will lead to imbalance in the system. The basic message is that the generators should make necessary arrangements for scheduled transaction of their infirm power. The Commission is of the view that sufficient avenues are available for the generators to sell their infirm power in the market. Hence, the generators should explore those options rather than using grid as a market for injection and obtaining compensation."</i></p> <p>Keeping the above in view, it is requested to consider the following to be specified in IEGC amendment. <i>"(c) Injection of infirm power, except in cases of commercial sale of such power, shall not exceed 45 days from the date of FTC approval for REGS and ESS."</i></p> <p>Restriction on injection of power from any REGS is not only against the mandate of promotion of Renewable Energy as</p>

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				mandated under Sec 61 (h) & 86(1) (e) of EA 20023 but also an opportunity loss for utilization of RE sources which can't be stored but eventually would be spared/wasted in such cases without any use of such energy.
3.	<p>49. Procedure for scheduling and dispatch for Inter-state transactions</p> <p>(7) Revision of Declared Capacity and schedule</p>	<p>(7) Revision of Declared Capacity and schedule shall be allowed on account of forced outage of a unit of a generating station or ESS (as an injecting entity) only in case of bilateral transactions and not in case of collective transaction.</p> <p>..</p> <p><i>(7-a) Revision of Declared Capacity and schedule of a generating station or ESS (as an injecting entity) shall be allowed only in case of bilateral transactions and not in case of collective transaction as per following details:</i></p> <p><i>(a)The generating station (other than lignite, gas based thermal generating station, and hydro generating station) or ESS (as an injecting entity), shall be allowed a maximum of 4 (four) revisions of</i></p>	<p>(7) Revision of Declared Capacity and schedule shall be allowed on account of forced outage of a unit of a generating station or ESS (as an injecting entity) only in case of bilateral transactions and not in case of collective transaction.</p> <p>..</p> <p><i>(7-a) Revision of Declared Capacity and schedule of a generating station or ESS (as an injecting entity) shall be allowed only in case of bilateral transactions and not in case of collective transaction as per following details:</i></p> <p><i>(a)The generating station (other than lignite, gas based thermal generating station, and hydro generating station) or ESS (as an injecting entity), shall be allowed</i></p>	<p>Rationale: RE generation is totally dependent on the weather conditions and same are very dynamic and intermittent in nature. Comparatively conventional power projects (other than RE) are more stable and its dependency upon fuel is also much predictive in order to account-for the forecast and the possible generation from these projects.</p> <p>Further, in case of solar projects as being setup in blocks of smaller capacity, these block acts as an independent unit generating stations. Whereas in case of Wind, individual WTGs itself acts as an independent unit generating stations. Having more no of unit wise structure installed in large geographical area, RE projects are more vulnerable to the forced outages situations.</p>

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		<p><i>Declared Capacity and schedule in a day subject to a maximum of 60 (sixty) revisions during a month, due to reasons such as a partial outage of the unit or variation of fuel quality or any other technical reason to be recorded in writing.</i></p> <p><i>(b) The generating station based on lignite, gas or hydro generating station shall be allowed 6(six) revisions of Declared Capacity and schedule in a day subject to a maximum of 120 (One hundred twenty) revisions during a month, due to reasons such as partial outage of the unit or water availability for hydro generating stations or fuel quality or variations in supply of gas for gas generating stations or any other technical reason to be recorded in writing.</i></p>	<p><i>a maximum of 4—(four) 12(Twelve) revisions of Declared Capacity and schedule in a day subject to a maximum of 60 (sixty) 240 (Two hundred Forty) revisions during a month, due to reasons such as a partial outage of the unit or variation of fuel quality or any other technical reason to be recorded in writing.</i></p> <p><i>...</i></p>	