



**DIRECTORATE OF ENERGY, GOVERNMENT OF HIMACHAL PRADESH  
MC PARKING BUILDING, 2<sup>ND</sup> FLOOR, NEAR TUTIKANDI CROSSING  
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**No.: GoHP/DoE/Sale of Power/CERC/2024- 2690**

**Dated: 18/07/2024**

From

Director,  
Directorate of Energy.

To

The Secretary,  
Central Electricity Regulatory commission,  
7<sup>th</sup> Floor, World Trade Centre, Tower B,  
Naurojinagar, New Delhi- 110029.

**Subject: Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024.**

**Sir,**

In reference to your Public notice No.L-1/265/2022/CERC dated 12.06.2024 vide which comments/suggestions/objections from stakeholders and interested persons on the above draft regulations were sought.

In this regard, please find enclosed herewith the comments/ suggestions/objections as (Annexure-"A") to the Draft CERC (Indian Electricity Grid Code) (First Amendment) Regulations, 2024. This is for your kind information and necessary action in the matter please.

**Yours faithfully,**

Superintending Engineer (Elect.),  
Directorate of Energy,  
GoHP. New Shimla-09.

## **Comments of GoHP on Indian Electricity Grid Code (First Amendment)**

### **Amendment to Regulation 49 of the Principal Regulations**

#### **Sr. No 6. Amendment to Regulation 49 of the Principal Regulations**

(1) The words “unless the consent is withheld by the beneficiary or buyer in writing” under sub-clause (1) of Clause (1) of Regulation 49 of the Principal Regulations shall be substituted with the words “without the consent of beneficiary(ies).”

#### **GoHP's Comments:**

It is submitted that the proposed substitution is further contradicting the provisions of Regulations and procedure. The following points outline our position:

#### **1. Existing Regulatory Framework:**

According to the Connectivity and General Network Access to the Inter-State Transmission System Regulations of 2022 and subsequent amendments, along with the Indian Electricity Grid Code Regulations of 2023, scheduling procedures were revised and implemented from October 1, 2023. HPSEBL was assigned a GNA limit of 1130 MW based on these regulations.

#### **2. Scheduling Challenges:**

NRLDC schedules approximately 551 MW of GoHP share of power in hydro power projects along with HPSEBL's power, which exceeds HPSEBL's GNA limit and results in the curtailment of firm power shares from thermal generating stations. Despite HPSEBL's net drawl being significantly lower (300 to 700 MW) compared to the GNA limit of 1130 MW after finalizing the state's net drawl schedule.

#### **3. Free Power Share and Scheduling:**

CERC has already permitted GoHP to schedule its free power share at the generator bus, although the detailed procedure is pending. GoHP sells this scheduled power outside the state after initially scheduling it to Himachal Pradesh. During the peak season of hydro generation, the total schedule of Inter-State Generating Stations (ISGS) for HP (HPSEBL Schedule + GoHP schedule) exceeds HPSEBL's GNA limit, leading to the curtailment of cheaper power sourced from thermal plants, where HPSEBL has long-term power purchase agreements.

#### **4. Financial Implications:**

The recent amendments in the Electricity (Late Payment Surcharge and Related Matters) Rules of 2022, along with the order dated February 28, 2024, and the procedures notified by Grid India on June 3, 2024, have resulted in NTPC selling the curtailed share of HP in



power markets without the consent of HPSEBL, causing financial losses to the state. The net drawl schedule of the state remains well within the GNA limit after considering the GNA/TGNA schedule to the state at 9:45 AM due to regulatory constraints.

#### 5. Alignment of Procedures:

Given the exhaustion of Himachal Pradesh's GNA limit by approximately 8:30 AM under current practices and the scheduling of GoHP's power share within HPSEBL's GNA, cheaper power is curtailed. GoHP and HPSEBL have made arrangements with other utilities for their power, which is scheduled under the T-GNA.

The procedure for implementation of the Electricity (Late Payment Surcharge and Related Matters) Rules of 2022, as notified by NRLDC, provided at Sr. No. 7 section F (b) that requirement for distribution licensees to intimate their power requisition schedule two hours before the closing of the Power Exchange bidding window for the Day Ahead Market.

The IEGC clause 49(1)(J)(IV) stipulates that RLDC shall issue the final drawl schedule for T-GNA grantee by 9:45 AM of D-1 day. Additionally, clause 49(1)(I) states that generating stations may sell their un-requisitioned surplus as available at 9:45 AM in the Day Ahead Market unless the consent is withheld by the beneficiary or buyer in writing.

#### 6. Proposal for Amendment:

The Sr. No. 7 section F (b) of the procedure contradicts clause 49(1)(J)(IV) and clause 49(1)(I) of the CERC Indian Electricity Grid Code with respect to timelines. Therefore, these procedures need to be aligned.

**Request for Consideration:** To ensure efficient utilization of power resources and to avoid the curtailment of cheaper power, it is requested that:-

- i. The net drawl schedule for the state be adjusted, taking into account both GNA and T-GNA by 9:45 AM. It is proposed that clause 49(1)(k) be amended in the IEGC as follows:  
"RLDC shall update the availability of balance transmission corridor after finalization of schedules for GNA & TGNA grantee by 9:45 AM of D-1 day. The balance transmission corridor may be utilized by GNA grantee from 9:45 AM to 10:00 AM. After that, the balance corridor will be released for Day Ahead collective transactions."
- ii. The timelines provided in clause 49(1)(I) of IEGC may be amended from 9.45 AM to 10.00AM so as to align with above said clause.
- iii. and the timeline provided at Sr. No. 7 section F (b) in the procedure for implementation of the Electricity (Late Payment Surcharge and Related Matters) Rules of 2022, as notified by NRLDC, may be amended from two hours to one hour before the closing of the Power Exchange bidding window for the Day Ahead Market