



**JHABUA
POWER**

Ref No. JPL/BD/CERC/2024/05

12.07.2024

To,
The Secretary
36, 1st Floor, Chander Lok Building,
Near Petrol Pump, Janpath,
New Delhi- 110001

Sub: Jhabua Power Ltd's comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024.

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Dear Sir,

Please find attached comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024. for kind consideration of Hon'ble Commission.

Thanking You,
Yours faithfully,

Vinod Kumar Jain
AGM-Commercial

Jhabua Power Ltd- JV of NTPC Ltd

Jhabua Power Limited

A Joint Venture of NTPC Limited)

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Jhabua Power Ltd (JPL)

Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024

Please find herewith Jhabua Power Ltd's (JPL) comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024:

Clause No	Existing clause	Proposed changes/Suggestions/ observations	Rationale
<p>Clause 48 of IEGC, 2023- Scheduling from Alternate Source of Power</p>	<p>(1) A generating station may supply power from alternate source in case of (i) USD in terms of clause (1) of Regulation 47 of these regulations or (ii) forced outage of unit(s) or (iii) a generating station other than REGS replacing its scheduled generation by power supplied from REGS irrespective of whether such identified sources are located within or outside the premises of the generating station or at a different location.</p>	<p>Hon'ble Commission is requested to modify the existing clause as follows:</p> <p>(1) A generating station may supply power from alternate source in case of (i) USD in terms of clause (1) of Regulation 47 of these regulations or (ii) forced outage / planned outage/ partial outage of unit(s) or (iii) a generating station other than REGS replacing its scheduled generation by power supplied from REGS irrespective of whether such identified sources are located within or outside the premises of the generating station or at a different location.</p>	<ul style="list-style-type: none"> It has been observed that generating stations are allowed to procure power from alternate sources when the plant is under forced outage to meet their energy supply obligations. It may also be appreciated by the Hon'ble Commission that other than the Forced Outage, there are incidences of Planned Outages on account of Annual Overhauling (~45 days), low fuel stock etc as well during which the generating station is not able to fulfil their obligation to beneficiaries. Such outages severally impact availability of the plant especially in case of Section 63 PPAs wherein 85% availability is to be maintained on Quarterly/annual basis else damages at the rate of 25% of quoted fixed cost are levied on generators. Allowing the generators to procure power from alternate sources (including power exchanges- DAM, G-DAM, TAM, G-TAM & RTM) during Planned Outage will help in bridging Demand Supply gap as the beneficiaries won't have to purchase expensive power from other sources. Moreover, through proper planning and timely arrangement of alternate source, the generators will also

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			<p>be able to meet their supply obligations and thus be entitled to recover their fixed costs and further minimise the levy of any penalty etc as per PPAs.</p> <ul style="list-style-type: none"> Many contracts of short-term nature are being scheduled under T-GNA as well as GNA depending up on Discom's GNA capacity which may vary in Real time basis. During Partial Outage (say 1 ID fan tripping) generators are being forced for DSM penalty due to no revision of schedule being punched in T-GNA. Therefore, schedule revision or buying of power from Alternate sources even though Unit is On-Bar should be allowed to avoid DSM penalty. Such revision/buying of power may be restricted as deemed fit by the Commission to avoid the gaming by generators.
<p>Clause 49 (4) (a) regarding Revision of schedules on request of buyers which are GNA grantees</p>	<p>(a) SLDCs on behalf of intra-state entities, regional entity ESSs as drawee entities, beneficiaries, regional entity buyers or cross-border buying entities may revise their schedules under GNA as per sub-clauses (b) and (c) of this clause in accordance with their respective contracts</p> <p><u>Provided that scheduled transactions under T-GNA once scheduled cannot be revised other than in case of forced outage as per clause (7) of this Regulation.</u></p>	<p>Hon'ble Commission is requested to allow revision of transactions under T-GNA as well due to revision in DC during the day. Moreover,</p>	<ul style="list-style-type: none"> A plant may have part tie-up in Sec-62, Sec-63 and partly on merchant tie-up basis. In case of DC revision, as on date, schedule revision is possible only for the contracts punched under GNA and other contracts executed at Power Exchange (even if they are under GNA) cannot be revised as per the exchange rules. This creates a challenging situation for a generator wherein revision happens disproportionately (due to such restrictions) from the Contracts which are punched under GNA & full schedule is to be given to

Clause No	Existing clause	Proposed changes/Suggestions/ observations	Rationale
			<p>Other Contracts punched under T-GNA.</p> <ul style="list-style-type: none"> Since scheduling can be done either in GNA or in T-GNA for any type of Contracts, there should not be any differentiation for revision also otherwise it creates differentiation in scheduling and long term beneficiaries are at disadvantageous position during real time operation.
<p>Clause 49 (7) regarding Revision of Declared Capacity and schedule</p>	<p>..... Provided further that the SLDC or the RLDC as the case may be, shall inform the revised schedule to the seller and the buyer. The original schedule shall become effective from the estimated time of restoration of the unit.....</p>	<p>Clause may be modified as follows: Provided further that the SLDC or the RLDC as the case may be, shall inform the revised schedule to the seller and the buyer. The original schedule shall become effective from the estimated time of restoration of the unit <u>based on station capacity/ Ramp rate</u>.....</p>	<p>It is not possible of the unit to reach the max Contracted capacity against all the PPAs as soon as unit is restored. Therefore, the schedule can be given gradually on pro-rata basis depending up on the Ramp up capacity to achieve the desired/contracted load.</p> <p>The suggested modification will avoid over-injection in the grid during Unit start up after tripping.</p>
<p>Clause 49 (7-A)</p>	<p>(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</p>	<p>The clause may be modified as follows; (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 <u>(whether punched under GNA or T-GNA)</u> and not in case of collective transaction.</p>	<p>Since, Hon'ble Commission has permitted the beneficiaries to Schedule any type of contracts under GNA or T-GNA, thus this revision should be allowed in both the modalities.</p>