



MP POWER MANAGEMENT COMPANY LIMITED

C.I.N.: U40109MP2006SGC018637

(MP GOVT. UNDERTAKING)

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No. CGM (Regulatory)/ 180

Jabalpur, Dated: 24/7/24

To,

The Secretary,
Central Electricity Regulatory Commission,
7th Floors, Towers-B, World Trade Center,
Nauroji Nagar, New Delhi - 110 029.

Sub: Comments on Draft CERC (Indian Electricity Grid Code) (First Amendment) Regulations, 2024.


Ref:- Public Notice no L-1/265/2022/CERC dated 12.06.2024.

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This refers to above Public notice dated 12.06.2024 vide which comments have been invited on the Draft CERC (Indian Electricity Grid Code) (First Amendment) Regulations, 2024 to be uploaded on Saudamini Portal on or before 15.07.2024, In the context MPPMCL has drafted its comments for submission before Hon'ble Commission which are enclosed herewith in one original + two copies (3 copies) for kind consideration of Hon'ble Commission.

It is humbly requested to kindly extend the date of filing the comments and condone the delay in filing of comments.

Encl: As above


Chief General Manager (Regulatory)
M.P. Power Management Company Ltd.
Jabalpur

1. **Subclause 2(b) of clause 6 of Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024**

Comments: Any adjustment under the compensation shall not be a burden to any utility otherwise there will be undue burden on consumers.

2. **Subclause (4) of clause 6 of Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024**

Comments: The provision of not allowing downward revision of schedules by the buyers for 'D' day after 1430 hrs on 'D-1' day in the generating station below their respective share of the minimum turndown level is not appreciable. If a generator has multiple beneficiaries and receives its schedule exceeding the minimum turndown level from its combined buyers, any request from a buyer for a downward revision below minimum turndown level will not be possible in this scenario. This gives an undue advantage to the generator and imposes an undue burden on the consumers. Therefore, this issue must be properly amended. However, the generators also have access to the market and they can get furnish the shortfall in the minimum turndown level from the market.

3. **Subclause (5(b)) of clause 6 of Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024**

Comments: Allowing 'six' revisions of Declared Capacity and schedule in a day subject to maximum 120 (One hundred twenty) revisions during a month and restricting revision of buyers in the **Subclause (4) of clause 6** of this regulations makes it look like as it is generator biased. The generator revisions should be minimized as the DISCOMs are planning in day-ahead and with every revision the planning of the DISCOMs gets affected which can have financial implications. However, the generators also have access to the market and they can get furnish the shortfall from the market. Then it would be appropriate that only two revision shall be allowed. In case any further shortfall occurs then generator should have flexibility to procure power from market to fulfil such shortfall.

Additional comments:

4. **Subclause (14) of clause 45 of Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2023.**

Comments: The clause shall be amended such that drawee entity shall be allowed to schedule injection or drawal only up to its effective GNA quantum and T-GNA quantum after the transactions of power exchanges have been settled. This will avoid so as to avoid any shortfall in the quantum of GNA after final scheduling. If the DISCOM licensee wants to sell power in the market before the closure of market then it can schedule power in such a manner that after the power market transactions are settled the GNA quantum shall not have any shortfall and therefore the DISCOM licensee will be able to bring the power in the market which will be beneficial for consumers and the DISCOM licensee.