

To: Harpreet Singh Pruthi <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>
Cc: Mahesh Vipradas <Mahesh.Vipradas@sembcorp.com>, milind nigudkar <milind.nigudkar@seilenergy.com>
Sent: Mon, 15 Jul 2024 18:14:07 +0530 (IST)
Subject: Comments/suggestions have been invited on "Draft Central Electricity Regulatory Commission (Indian Electricity

SC-Restricted

Dear Sir / Madam,

We are writing this email in reference to Public Notice No. L-1/265/2022/CERC Dated: 12.06.2024, wherein comments/suggestions have been invited on "Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (First Amendment) Regulations, 2024". Please find enclosed the comments/suggestions on behalf of Sembcorp for your kind consideration.

Regards,
Raman Gulati

Raman Gulati
Senior Manager
Regulatory & Power Markets, India

Sembcorp India Private Limited
Building 7A, Level 5, DLF Cyber City, Gurugram - 122002, Haryana, India
Tel: [+91 1246986697](tel:+911246986697)

Website<<https://www.sembcorp.com/en/>> |
LinkedIn<<https://www.linkedin.com/company/sembcorp-industries-ltd/>>

[<https://media.sembcorp.com/data/WWW-MEDIA/Email%20Signature/sustainabilityemailsignature.jpg>]

Sembcorp's Comments/suggestions on Draft 1st Amendment to CERC IEGC Regulations, 2024

Sr no.	Original Regulations	Draft Amendment	Suggested change	Remarks
1.	<p>19. DRAWAL OF START UP POWER AND INJECTION OF INFIRM POWER</p> <p>...</p> <p>(2) The period for which such interchange shall be allowed shall be as follows:-</p> <p>(a) Drawal of start-up power shall not exceed 15 months prior to the expected date of first synchronization and one year after the date of first synchronization; and</p> <p>(b) Injection of infirm power shall not exceed one year from the date of first synchronization.</p>	<p>19. DRAWAL OF START UP POWER AND INJECTION OF INFIRM POWER</p> <p>...</p> <p>(2) The period for which such interchange shall be allowed shall be as follows:-</p> <p>(a) Drawal of start-up power shall not exceed 15 months prior to the expected date of first synchronization and one year after the date of first synchronization; and</p> <p><u>(b) Injection of infirm power shall not exceed one year from the date of first synchronization for generating stations other than REGS and ESS.</u></p> <p><u>(c) Injection of infirm power shall not exceed 45 days from the date of FTC approval for REGS and ESS.</u></p>	<p>19. DRAWAL OF START UP POWER AND INJECTION OF INFIRM POWER</p> <p>...</p> <p>(2) The period for which such interchange shall be allowed shall be as follows:-</p> <p>(a) Drawal of start-up power shall not exceed 15 months prior to the expected date of first synchronization and one year after the date of first synchronization; and</p> <p>(b) Injection of infirm power shall not exceed one year from the date of first synchronization for generating stations other than REGS and ESS.</p> <p>(c) Injection of infirm power shall not exceed 45 days from the date of FTC approval for REGS and ESS.</p>	<p>It may be noted that as per Clause 19(7) of IEGC Regulations, 2023 the RE projects can inject the infirm power to the grid only for the specific purposes such as pre-commissioning activities, testing and Commissioning. The concerned RLDC is also mandated to seek the information for such injection of infirm power on each occasion before COD.</p> <p>The current regulation already limits infirm power injection to legitimate purposes like pre-commissioning and testing is and ensures that it is not done for any commercial gain or other misuses. Therefore, the justification provided by Grid-India (ref. Explanatory Memorandum) to shorten the allowed injection period from 1 year to 45 days seems unnecessary.</p> <p>It may further be noted that in-between the FTC and the COD of</p>

Sr no.	Original Regulations	Draft Amendment	Suggested change	Remarks
				<p>the project, the developers must showcase the successful trial run of the project. Such demonstration of trial run is dependent on the adequate availability of wind/solar resource. There are several other issues that developers might witness which may not allow the developers to declare the COD within such short time frame of 45 days. Besides, the authenticity infirm injection of power can always be validated by the concerned authorities.</p> <p>Further under the DSM Regulations the unscheduled infirm power does not provide any revenue to the developer and hence the developers always try to sell such power in exchange. Such infirm power being sold on exchange is scheduled on day-ahead basis and therefore will not pose any risk on the grid.</p> <p>On the other hand, the proposed modification in the draft will unnecessarily force developers to prematurely declare the COD and</p>

Sr no.	Original Regulations	Draft Amendment	Suggested change	Remarks
				<p>pull away the flexibility provided under the current IEGC Regulations.</p> <p>Further As per the draft, the revision in capping has been proposed only for the RE projects, and thermal generators still allowed to have flexibility to inject infirm power till 1 year from FTC. While the issues and reasons for thermal and RE projects can be different, but fact of the matter is that they both have equally exposed to face pre-commissioning for RE projects.</p> <p>In view of above, it is requested that period of 1 years be continued to be retained for injection of infirm power, at least for the power being scheduled. Such limit of 45 days may only be introduced only for un-scheduled injection of infirm power.</p>
2.	<p>45. GENERAL PROVISIONS ... (12) Minimum turndown level for regional entity thermal generating stations:</p>	<p>45. GENERAL PROVISIONS ... (12) Minimum turndown level for regional entity thermal generating stations:</p>		<p>There could be scenario, where only a part capacity from a generating Station is tied-up under LT PPA and the remaining capacity is being sold on ST/Exchange market.</p>

Sr no.	Original Regulations	Draft Amendment	Suggested change	Remarks
	<p>The minimum turndown level for operation in respect of a unit of a regional entity thermal generating station shall be 55% of the MCR of the said unit or such other minimum power level as specified in the CEA (Flexible Operation of coal based Thermal Generating Units) Regulations, 2023, as amended from time to time, whichever is lower:</p> <p>Provided that the Commission may fix through an order a different minimum turndown level of operation in respect of specific unit(s) of a regional entity thermal generating station:</p> <p>Provided further that such generating station on its own option may declare a minimum turndown level below the minimum turndown level specified in this clause:</p> <p>Provided also that the regional entity thermal generating stations whose tariffs are determined under Section 62 or Section 63 of the Act, shall be compensated for part load operation, that is, for generation below the normative level of operation, in</p>	<p>The minimum turndown level for operation in respect of a unit of a regional entity thermal generating station shall be 55% of the MCR of the said unit or such other minimum power level as specified in the CEA (Flexible Operation of coal based Thermal Generating Units) Regulations, 2023, as amended from time to time, whichever is lower:</p> <p>Provided that the Commission may fix through an order a different minimum turndown level of operation in respect of specific unit(s) of a regional entity thermal generating station:</p> <p>Provided further that such generating station on its own option may declare a minimum turndown level below the minimum turndown level specified in this clause:</p> <p><u>Provided further that the regional entity thermal generating stations whose tariffs are adopted under Section 63 of the Act shall be compensated for part load operation, that is, for generation below the normative level of operation, in</u></p>		<p>In such a scenario, the LT procurers limit the backing down up to their respective share of minimum turndown level in the generating station.</p> <p>Say for a 1000 MW station if there two LT contracts of 200 MW and a 300 MW, the MTL (@55%) for each of such procurer works out to be 110MW and 165MW respectively.</p> <p>As computation of MTL is worked out at PPA level, the compensation for part load operation should also be allowed to the generator at PPA level and not on the entire Station level.</p> <p>This also supports the fact that, generator in such cases is obligated to supply power to its procurer (at MTL computed at PPA level), thus it is requested that the compensation on part load should also be allowed at PPA level instead of station capacity level.</p>

Sr no.	Original Regulations	Draft Amendment	Suggested change	Remarks
	<p>terms of the provisions of the contract entered into by such generating stations with the beneficiaries or buyers, or in the absence of such provision in the contract, as per the mechanism to be specified by the Commission through separate regulations or through Order:</p> <p>Provided also that till the mechanism of part load compensation is notified by the Commission, the mechanism in this regard already in force under the Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2010 shall continue to be in operation.</p>	<p><u>terms of the provisions of the contract entered into by such generating stations with the beneficiaries or buyers, or in the absence of such provision in the contract, as per the mechanism already in force under the Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2010:</u></p> <p><u>Provided further that the thermal generating stations whose tariffs are determined under Section 62 of the Act by the Commission, shall be compensated for part load operation as per the provisions of applicable Tariff Regulations.</u></p>		