

To: Harpreet Singh Pruthi <secy@cercind.gov.in>, Shilpa Agarwal
<shilpa@cercind.gov.in>
Cc: ajay kapoor <ajay.kapoor@tatapower.com>, paramita saho
<paramita.sahoo@tatapower.com>, amit gaur <amit.gaur@tatapower.com>
Sent: Mon, 15 Jul 2024 19:40:46 +0530 (IST)
Subject: Tata Power Comments_ 1st Amendment_ IEGC 2023

Dear Sir/Mam

Please find enclosed Tata Power's comments on the 1st Amendment_ IEGC
2023.

Regards,

Mohd Sarim Siddiqui

Group Head - Advocacy

The Tata Power Company Limited, Shatabdi Bhawan, B-12 & 13, Sector 4,
Noida, UP-201301

Tel: [9891124514](tel:9891124514) Mobile: [9891124514](tel:9891124514)

[X]

Tata Power Comments on 1st Amendment IEGC 2023

S.No.	Clause No.	Clause Details	Changes Suggested	Comments/Rationale
1.	Clause 19.2	<p>19.2 DRAWAL OF START UP POWER AND INJECTION OF INFIRM POWER</p> <p><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.</i></p> <p><i>(c) Injection of infirm power shall not exceed 45 days from the date of FTC approval for REGS and ESS."</i></p> <p>19.3 <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 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>	Clause may please be appropriately modified as per comments	<p>As per IEGC, the Infirm power is defined as electricity injected into the grid prior to the date of commercial operation (DOCO) of a unit of the generating station.</p> <p>Also, as per EM, the infirm power can be interchanged with the grid only for specific purpose such pre-commissioning activities and commissioning.</p> <p>We feel there is no need for segregating a separate clause for REGs and ESS and request to kindly permit the injection of infirm power for REGs and ESS for a period of One year from the date of first synchronization.</p> <p><u>Rationale:</u></p> <p>In case of Hybrid (Solar +Wind) PPAs with REIAs (SECI/NTPC), Declaration of Commercial Operations / Commissioning/ Part Commissioning of the hybrid project is subject to COD/Commissioning/ Part Commissioning of Solar & Wind capacities together in the ratio as defined in the PPA (for example i.e. in the ratio of 66% (2/3rd) : 33% (1/3rd). Component commissioning is not allowed in the hybrid PPAs.</p> <p>Therefore, even after obtaining successful trial run certificate from RLDC for a single source (either for wind or solar), the generator is not able to Declare Commercial operations of that source due to non-compliance of the PPA terms. Hence, such generation from that source shall be allowed to schedule the power as infirm till the commissioning of the other source.</p>

S.No.	Clause No.	Clause Details	Changes Suggested	Comments/Rationale
				<p>Also for further clarification, we propose to kindly include the following in continuation after clause 19.b–</p> <p><i>"It is also proposed that for those REGs that obtained successful trial run certificates and are not able to declare commercial operations due to non-compliance of the PPA terms/conditions, shall be allowed for injection of infirm power till declaration of Commercial Operations of the project subject to obtaining consent/NOC for sale of infirm power from the REIA."</i></p>
2.	Clause 45 (12)	<p>12. Minimum turndown level for regional entity thermal generating stations</p> <p>.....</p> <p><i>"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 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:</i></p> <p><i>Provided further that the thermal generating stations whose tariffs are determined under</i></p>	May please provide clarity as per comments	<p>For sec-63 plants, compensation shall be as per CERC (IEGC) Regulations, 2010; and for sec-62, it shall be as per the provisions of applicable Tariff Regulations.</p> <p>For section 63, as proposed, clause 6.3 (B) of the CERC (IEGC) Regulations, 2010, provides for details on compensation;</p> <p>However, for Sec-62, currently the Tariff regulations do not provide details on this. Further, the EM of Tariff Regulations 2024 states as follows:</p> <p><i>18.6.5- ".....The Commission, to negate the financial implications on the generators due to part load operations, had already specified a compensation mechanism for degradation in Norms due to part load operations under sub-clause (6) of Regulation 6.3B of the IEGC, 2010. The Commission, in accordance with IEGC, 2023 is also in the process of specifying a fresh compensation mechanism based on CEA's recommendations, which will be sufficient to</i></p>

S.No.	Clause No.	Clause Details	Changes Suggested	Comments/Rationale
		Section 62 of the Act by the Commission, shall be compensated for part load operation as per the provisions of applicable Tariff Regulations”		<p><i>compensate for the degradation of Norms due to increased part load operations.”</i></p> <p>Therefore, reference is again being made to the <i>Regulation 6.3B of the IEGC, 2010.</i></p> <p>Therefore, it is requested that clarity be provided for sec-62 plants.</p>
3.	Additional Comment	<p>Clause 49 (8) says, in case of requirement of revision of schedule due to forecasting error, a WS seller may revise its schedule only in case of bilateral transactions and not in case of collective transactions and not in case of collective transaction. Any revision in schedule made in odd time blocks shall become effective from 7th time block and any revision in schedule made in even time blocks shall become effective from 8th time block, counting the time block in which the request for revision has been received by the RLDCs to be the first one.</p> <p>Observation & Suggestion: Implementation of revision for W-S sellers due to forecast error is in 7th / 8th Time slot is resulting in very high deviations since the purpose for submission of revision is to mitigate the forecasting error with the real time conditions.</p> <p>We recommend revising the Implementation of revision for W-S sellers submitted due to forecast error to be effective from 4th Time slot counting the time block in which the request for revision has been received by the RLDCs to be the first one.</p>		