

TPL/SUGEN/COMMERCIAL/24-25/022

Sep 06, 2024

Shri Harpreet Singh Pruthi
Secretary, Central Electricity Regulatory Commission
6th, 7th & 8th Floors, Tower B,
World Trade Centre, Nauroji Nagar
New Delhi- 110029

Sub: Comments / Suggestions on "Draft Central Electricity Regulatory Commission (Terms and Conditions of Tariff) (First Amendment) Regulations, 2024" in reference to public notice dated 02nd Aug 2024.

Dear Sir,

At the outset, we thank you for all the support and guidance provided to us on an ongoing basis.

With reference to your public notice No. No. L-1/268/2022/CERC, dated 02nd Aug-2024, we would like to submit our comments and suggestions on the Draft Central Electricity Regulatory Commission (Terms and Conditions of Tariff) (First Amendment) Regulations, 2024.

We look forward to your positive consideration of our suggestions.

Thanking You.

Yours faithfully,

For **Torrent Power Limited**



Authorized Signatory



Annexure -1

Clause	Existing	Proposed	Remarks
Clause 70 (G) (8)	<p>(8) There shall be a reconciliation of the compensation at the end of the financial year considering actual weighted average operational parameters of station rate, auxiliary energy consumption and secondary oil consumption.</p>	<p>(8) There shall be a <i>monthly</i> reconciliation of the compensation at the end of the financial year considering actual weighted average operational parameters of station heat rate, auxiliary energy consumption and secondary oil consumption.</p>	<p>Compensation for degradation on actual parameters are to be billed and settled monthly basis instead of annual reconciliation.</p> <p>The percentage change of Degradation of AEC and SHR on account of low load operation should not be averaged with operation of other month as the generating station will be incurring the degradation impact on during the operating month and hence may not be averaged out through annual reconciliation.</p>
Clause 70 (G) (9)	<p>(9) The change in the schedule of power under the provisions of Central Electricity Regulatory Commission (Ancillary Services Operations) Regulations, 2022 shall not be considered for compensation.</p>	<p>The change in the schedule of power under the provisions of Central Electricity Regulatory Commission (Ancillary Services Operations) Regulations, 2022 shall <i>not</i> be considered for compensation <i>and to be paid through Ancillary Services Pool account and to be reconciled on monthly basis in line with existing compensation mechanisms.</i></p>	<p>Generating station will be experiencing the degradation of AEC & SHR under both scenarios' instructions for backdown from either beneficiary or under directions ancillary operations.</p> <p>Hence , as provided in Clause 70 (g) (2) of the draft regulations , the generating station should receive compensation from the entity causing the plant to be operated below normative load factor. Existing markup incentives may not be sufficient to cover the degradation expense of AEC & SHR.</p> <p>Further, compensation due to operation in ancillary mechanism should be reconciled monthly for faster settlement of accounts.</p>



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