

Sembcorp's comments/suggestions on Draft Amendment to DSM Regulations

Sr no.	Draft Amendment Order		Comments/Suggestions
1.	<p>8) The charges for injection of infirm power shall be zero:</p> <p>Provided that if infirm power is scheduled after a trial run as specified in the Grid Code, the charges for deviation over the scheduled infirm power shall be as applicable for a general seller or WS seller, as the case may be:</p> <p>Provided further that when the system frequency, $f > 50.05\text{Hz}$, the charges for deviation of scheduled infirm power by way of over injection by a general seller or WS seller, as the case may be, shall be zero.</p>	<p>8) The charges for injection of infirm power shall be zero in case of injection of infirm power is not scheduled.</p> <p>Provided that if infirm power is scheduled after a trial run as specified in the Grid Code, the charges for deviation over the scheduled infirm power shall be as applicable for a general seller or WS seller, as the case may be:</p> <p>Provided further that when the system frequency, $f > 50.05\text{Hz}$, the charges for deviation of scheduled infirm power by way of over injection by a general seller or WS seller, as the case may be, shall be zero.</p>	<p>It is understood, from the explanatory memorandum, that intention of this amendment is to not allow sale of infirm power prior to trial run. The proposed clause 8 need to clarify what is referred as "charges" i.e. if these for deviation or charges of energy sale.</p> <p>If it is meant to be no payment for injected energy, it is submitted in case of power plants especially wind projects the turbines are installed and synchronised one by one while as trial run can only start after reaching total capacity of 50MW. Thus, any generation till start of trail run would be lost if it is not allowed to be sold. Further, even during trial run there would be generation and injection of power. It is well-established that scheduled power injection is advantageous compared to unscheduled power, as it provides prior information to grid operators, enabling them to optimize power dispatch and maintain grid stability.</p> <p>The recent amendment to the IEGC Regulations already limits pre-COD power injection only for 45 days from FTC approval. However, the proposed draft amendment stipulates that generators will not be allowed to realize any revenue for the injection of pre-Trial run infirm power.</p> <p>In view of above, it is requested to:</p> <p>Allow scheduling and revenue realisation for injection of infirm power for period between FTC approval the trial-run which is already restricted to 45 days from FTC. Permitting the scheduling of such infirm power (pre-trial run) will only promote the grid stability. During this period the available capacity may be restricted to the capacity for which FTC has been received.</p>