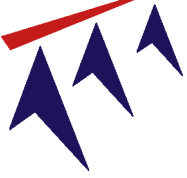


CONTINUUM



CONTINUUM GREEN ENERGY PRIVATE LIMITED
(Formerly known as *Continuum Wind Energy (India) Private Limited*)

Date: 01.11.2024

To
The Secretary,
Central Electricity Regulatory Commission,
7th floor, World Trade Centre, Nauroji Nagar,
New Delhi – 110029.

Dear Sir/Madam,

Sub: Comments on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) (First Amendment) Regulations, 2024

We are thankful to the Hon'ble Central Electricity Regulatory Commission for providing an opportunity for us to share our suggestions and feedback on the Comments on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) (First Amendment) Regulations, 2024 (Draft Notification No. No. L-1/260/2021/CERC/ (Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) (First Amendment) / Dated 02-10-2024). Please find our suggestion and feedback in the Annexure.

We request the Hon'ble Central Electricity Regulatory Commission to kindly consider our submission, as may be considered appropriate by the Commission.

Regards,

For Continuum Green Energy Private Limited

Authorised Signatory

Registered Office: Survey No. 356 & 391, Periyakumarapalayam Village, Gudimangalam, Dharapuram Taluk, Tirupur District,
Coimbatore, Tamil Nadu, India, 642201.

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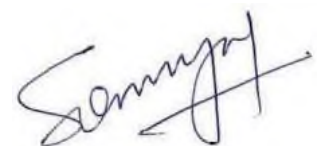
CIN: U40102TZ2007PTC038605

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Annexure A

Comments on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) (First Amendment) Regulations, 2024				
SI. No.	Regulation No/Clause No.	Existing Clause as per the Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) (First Amendment) Regulations, 2024	Proposed Clauses suggested by Continuum Green Energy Private Limited (CGEPL) in the Existing Clause of the Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) (First Amendment) Regulations, 2024	Remarks for proposed clauses in the Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) (First Amendment) Regulations, 2024
1)	Amendment of Regulation 8	<p>3. Amendment of Regulation 8 (Charges for Deviations) of the Principal Regulations:</p> <p>3.1 Clause (8) of Regulation 8 of the Principal Regulations shall be substituted as under: “(8) The charges for injection of infirm power shall be zero: 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: 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>We request you to consider the clause proposed by us,</p> <p>3. Amendment of Regulation 8 (Charges for Deviations) of the Principal Regulations:</p> <p>3.1 Clause (8) of Regulation 8 of the Principal Regulations shall be substituted as under:</p> <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: 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>In this regard we would like to submit that the CERC IEGC Regulation stipulates injection of infirm power up to 45 days in the case of RE Generators. To align IEGC and DSM Regulations, scheduling of infirm power before demonstration of firm capacity to be allowed only up to 45 days. By the end of such 45 days, the RE generators shall be obligated to establish firm capacity along with communications and metering systems.</p> <p>For completing the various test requirements to demonstrate the compliance parameters as per CEA standards, it is highlighted that there are various technical and practical difficulties as elaborated below:</p> <ul style="list-style-type: none"> • Most of the REGS plants are charged and commissioned in parts/phases (in small packages of 50 MW or lower capacity) which in turn takes time in completion of trial run w.r.t. complete project capacity. • Further, charging of individual elements of REGS/ESS such as 220 KV line, 220 KV Bay, 33/220 KV transformers, 33 KV feeders, WTG and 33 KV unit Transformers etc. takes place in phases. In such cases, it usually takes 4-5 attempts in completion of charging of merely 100 MW project as such feeders are charged one by one progressively. And in case of large-scale projects, it would certainly need some extra time for charging and synchronization alone. • Even after charging such part capacity, various checks of parameters are required to be done internally which takes more time in corroborating the desired results which is quite essential to avoid any issue during the trial run. • During monsoon season, testing is not possible at required rated capacity, due to rapid change in radiation and wind speed. Similarly, during lean wind season, generation from wind also faces constraints • During the testing, due to sudden movement of cloud or drop in wind speed, any small deviation in the generation may lead to failure of Trial run testing. • Despite having necessary equipment’s installed at site, there are practical difficulties in completing all the necessary tests as required in terms of IEGC 2023 Regulation. The PPC test requires



Annexure A

				<p>some additional time by OEM for operating parameters configuration, logics development, software program fine tuning etc. to make it absolutely ready for the Grid operation conforming to prescribed CEA standards.</p> <ul style="list-style-type: none">• Hence, typically completion of the PPC test requires 5 to 6 months for a large-scale power plant equivalent to 500 MW. <p>Further it is submitted that the IEGC 2023 Regulation and its amendment already provides for certain conditions to demonstrate the firm capacity such as 4 hours of cumulative power flow during sunrise to sunset for solar and during a day for wind generators.</p> <p>Further it is further submitted that the Grid management would be better if infirm power is also scheduled, as the Grid operators will have fair idea about the injection of power into the grid. It would be useful to plan and manage the Grid better in comparison to a situation when there is no information available about the quantum of infirm power coming into the grid. Unless there are any commercial implications for the deviations, the Generator would be free to inject any amount of infirm power.</p> <p>Considering these aspects in a holistic way, it would be prudent to allow scheduling of infirm power during or before completion of trial run.</p> <p>We therefore humbly request Hon'ble CERC to continue with its approach of allowing scheduling of infirm power as per its Suo-motu Order dated 06.02.2023 issued in Petition no 01/SM/2023 subject to the conditions as explained below.</p> <p>Therefore in view of the above, we request you to consider the clause proposed by us.</p>

