

## Tata Power- Comments on Draft 1<sup>st</sup> Amendment DSM Regulations 2024-

Sr No.	Clause. No./Title	Original Provision as in Draft	Proposed	Comments/Suggestions
2.	3.1 (j) Definitions	<p><b>'Contract rate'</b>  <i>means.....</i>  <i>.....) in respect of a WS seller or a MSW seller or such other entity as applicable, <b>selling power through open access to a third party or in case of captive consumption</b> of a captive generating plant based on renewable energy sources, the <b>weighted average ACP of the Integrated-Day Ahead Market segments of all Power Exchanges for the respective time block;</b></i></p>	Changes may please be done appropriately as per the comments/suggestions	<p>In most cases, where WS seller or MSW seller or such other entity as applicable, selling power through open access to a third party is <b>under a PPA with the procurer with a tariff mentioned in that contract/LOI</b>. The various terms and conditions including tariff at which power will be sold are finalized after proper due diligence and negotiations amongst the parties and forms basis of the investment decisions. Therefore, <b>such tariff mentioned in the contract/LOI is a valid parameter to be used as the contract rate.</b></p> <p>However, for transactions, where tariff is not mentioned in the PPA/LOI, it is suggested to consider the weighted average ACP of the Integrated-Day Ahead Market segments of all Power Exchanges.</p>
2.	8 (Charges for Deviation)	<p><i>"The charges for <del>deviation</del> <b>injection by way of injection</b> of infirm power</i></p>	<p><i>"<b>From FTC to receipt of successful trial run certificate:</b></i></p>	As per clause 8, the scheduling of infirm power shall be permitted after the trial run,

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		<p><i>shall be zero: Provided that if infirm power is <b>scheduled after trial run</b> 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."</i></p> <p><i>Provided further that when the system frequency, <math>f &gt; 50.05\text{Hz}</math>, 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."</i></p>	<p><i>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.</i></p> <p><i>Provided further that when the system frequency, <math>f &gt; 50.05\text{Hz}</math>, 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.</i></p> <p><i>After receipt of successful trial run certificate to COD: 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"</i></p>	<p>which is post receipt of successful trial run certificate.</p> <p>It is to be noted, that once trial run certificate is received, the generator shall have to declare COD of the project to be in compliance with the commissioning requirements under the PPA, and power is scheduled as firm power. Therefore, there is no possibility of infirm power generation post receipt of trial run certificate.</p> <p>Further, infirm power is generated for conducting trial run activities such as demonstrating active power generation, PPC demonstration in different modes, reactive power devices demonstrations (such as STATCOM, Static Var Generators, Capacitor Banks etc.), Installation of Power quality equipment's &amp; demonstration (Harmonic filters), and repeat of the trial run activities due to weather conditions. On successfully complying all the grid requirements, the successful trial run certificate is issued by RLDC after complying all the commissioning related tests. The entire trial run process generally takes a long period depending on weather conditions. Hence, injecting of the power into the grid</p>

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				<p>without schedule during these trial run operations may pose risk to grid stability.</p> <p>Also, Clause 19.C of IEGC (1st Amendment) Regulations, 2024 says Injection of infirm power shall not exceed 45 (forty-five) days from the date of first time energization and integration (FTC) approval for REGS and ESS (except Hydro PSP ESS).</p> <p>In view of the above, <b>it is requested to kindly permit the scheduling of infirm power during the trial run operations.</b></p> <p><b>The Hon'ble commission may specify deviation charges differently for the period of trial run and after the trial, as proposed here.</b></p>