



# टीएचडीसी इंडिया लिमिटेड THDC INDIA LIMITED

(अनुसूची-‘क’ मिनो रत्न पीएसयू)  
(Schedule - A Mini Ratna PSU)

CIN : U45203UR1988GOI009822



भारत 2023 INDIA  
वसुधैव कुटुम्बकम्  
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पत्रांक: टीएचडीसी/ऋषि/वाणि./F-116 / 1174

दिनांक: 30.10.2024

सेवा में,

सचिव,  
केंद्रीय विद्युत विनियामक आयोग  
6वीं, 7वीं और 8वीं मंजिल, टॉवर बी, वर्ल्ड ट्रेड सेंटर,  
नौरोजी नगर, नई दिल्ली- 110029

विषय: केंद्रीय विद्युत विनियामक आयोग (विचलन निपटान तंत्र और संबंधित मामले) (प्रथम संशोधन) विनियम, 2024 के मसौदा विनियमों पर टीएचडीसीआईएल की ओर से टिप्पणियों/सुझावों के संबंध में।

Sub: THDCIL's comments/suggestions on draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) (First Amendment) Regulations, 2024- Reg.

Ref.: CERC's Public Notice No. L-1/260/2021/CERC dated 02.10.2024.

Sir,

With reference to the subject matter, please find enclosed herewith three hard copies of THDCIL's comments/suggestions on draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) (First Amendment) Regulations, 2024. The Soft copy of the above Comments/Suggestions has been uploaded on SAUDAMINI Portal's e-filing dashboard and mailed to secy@cercind.gov.in & advisor-re@cercind.gov.in .

‘सादर’

भवदीय  
टीएचडीसी इंडिया लिमिटेड की ओर से

आर के वर्मा  
30/10/2024

(आर के वर्मा)

अपर महाप्रबंधक, प्रभारी (वाणिज्यिक)

संलग्नक: उपरोक्तानुसार



प्रधान कार्यालय : गंगा भवन, प्रगतिपुरम, बाईपास रोड, ऋषिकेश - 249201  
Corporate Office : GANGA BHAWAN, PRAGATIPURAM, BYPASS ROAD, RISHIKESH - 249201  
पंजीकृत कार्यालय : भागीरथी भवन (टॉप टेरिस), भागीरथीपुरम, टिहरी गढ़वाल-249124  
Regd. Office : Bhagirathi Bhawan, (Top Terrace), Bhagirathipuram, Tehri Garhwal-249 124  
टेलीफैक्स- 0135-2439463, Telefax: 0135-2439463, Website Adress : www.thdc.co.in  
("हिन्दी को राजभाषा बनाना, भाषा का प्रश्न नहीं अपितु देशाभिमान का प्रश्न है")

S. No.	Regulation No.	Provisions as per CERC's Draft Regulation	Proposed Suggestions/ Amendments	Remarks
1	3 (3.1)	<p>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, <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.</p>	<p>The charges for the injection of unscheduled infirm power shall be 130 paise per kWh:</p> <p>No change</p> <p>No change</p>	<p>The current provision that prohibits earning revenue from the sale of infirm power before the trial run stage results in an unnecessary increase in the overall capital cost of the project. This is due to the costs incurred during testing and commissioning, such as the purchase of coal, oil, pumping energy, etc. The impact is detrimental not only to the developers but also to DISCOMs and end consumers. Allowing revenue generation from the sale of power through the DSM mechanism during this stage would help reduce the capital cost of the capital-intensive hydro and thermal projects. Consequently, it would contribute to lowering the tariff for projects. The proposed rate for such power is based on the energy charge rate outlined in the CERC Tariff Regulations, 2024, for the sale of secondary energy.</p>
2	<b>Additional Comment</b> (As per Clause 8 (5), CERC Notification No. L-1/	Charges for Deviation, in respect of a Standalone Energy Storage System (ESS), shall be the same as applicable to a general seller (other than RoR generating station and a generating station based on municipal solid waste)	Charges for Deviation, in respect of a Standalone Energy Storage System (ESS) excluding PSP, shall be the same as applicable to a general seller (other than RoR generating station and a generating station based on municipal solid waste).The	It is submitted that in the case of Pumped Storage Plants (PSP), whose tariff is determined under Section 62 of the Electricity Act, 2003, neither a reference rate nor a contract rate is available. This is because the Annual Fixed Cost (AFC) of the PSP is recovered

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	260/ 2021/ CERC	Provided further that the charges for deviation including the formula for computation of Deviation, in respect of charging of a standalone ESS being pumped hydro storage plant shall be the same as applicable to a WS seller being a generating station based on solar resources.	charges for deviations in respect of injection from Pumped Storage Plants shall be computed at a Reference Rate of 20 paise per kWh.  Provided further that the charges for deviation including the formula for computation of Deviation, in respect of charging of a standalone ESS being pumped hydro storage plant shall be computed at a rate of 20 paise per kWh.	entirely through Fixed Charges. Additionally, during the charging of the PSP, the input energy is arranged by the buyers, hence no contract rate is applicable.  Therefore, it is submitted that for PSPs, a reference rate and contract rate of 20 paise/kWh should be considered for the computation of deviation charges. This proposed rate is aligned with the energy charge rate specified in the CERC Tariff Regulations, 2024, for the sale of excess energy.
3	10(1) Schedule of Payment of charges for deviation of CERC (Deviation Settlement Mechanism and Related Matters) Regulations, 2024.	The payment of charges for deviation shall have a high priority, and the concerned regional entity shall pay the due amounts within 10 (ten) days of the issue of the statement of charges for deviation by the Regional Power Committee, failing which late payment surcharge @0.04% shall be payable for each day of delay.	The payment of charges for deviation shall have a high priority, and the concerned regional entity shall pay the due amounts within 10 (ten) days of the issue of the statement of charges for deviation by the Regional Power Committee, failing which late payment surcharge @0.04% shall be payable for each day of delay. However, in case the last day is an official holiday, the due date of payment shall be construed as the immediate succeeding working day.	This relaxation for due date is also provided in CERC Tariff Regulations, 2024.

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