

Comments and Suggestions on Draft 1st Amendment in DSM Regulations

Reference No- Public Notice No. L-1/260/2021/CERC dated 2nd October 2024

Apraava Energy Private Limited

Date of Public Hearing: 4th November 2024



Comments/Suggestions on Draft 1st Amendment in DSM Regulations

Contract rate (Regulation 3(1)(j)):

- With regard to a WS seller selling power through open access to a third party, Draft Regulation proposes the **Contract rate** as weighted average ACP of the Integrated-Day Ahead Market segments of all Power Exchanges for the respective time block.

Our submission:

- Wherever Contract rate is available regardless of short-term contract or long-term contract same may be considered for DSM purpose.
- **Rationale:** In case of open access to a third party by a WS seller if contract rate is considered as weighted average ACP of the Integrated-Day Ahead Market segments of all Power Exchanges for the respective time block then it will signal developers to under schedule during high price period (more than contract rate) and over schedule during low price period (less than contract rate).



Comments/Suggestions on Draft 4/SM/2024 Order

Infirm Power (Regulation 8(8)):

- The draft Regulations has proposed that
 - i. 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.
 - ii. 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.

Our Submission:

- Since deviation of WS seller is delinked from frequency in case of power sold after commissioning, hence similar approach should be taken for injection of infirm power.
- So, we request Hon'ble commission that **2nd proviso should not be made applicable to WS seller.**



Thank You