



West Bengal State Electricity Transmission Company Limited
(A Govt. of W.B. Enterprise)

Office of the Chief Engineer
State Load Despatch Centre (W.B.),
PO: Danesh Sk. Lane, Howrah – 711 109.

Memo No : SLDC/HOW/R-02/2024-25/195

Dated : 03.06.2024 .

To
The Secretary,
Central Electricity Regulatory Commission,
World Trade Centre, 6th, 7th and 8th floor,
Tower -B, Nauroji Nagar,
New Delhi-110029.

Sub : Comments/Suggestions of SLDC, WBSETCL to the draft CERC DSM Regulations-2024

Madam/Sir,

In reference to the above, please find enclosed the comments/suggestions on the Draft CERC (Deviation Settlement & Related Matters) Regulations, 2024 from SLDC/WBSETCL for your kind consideration.

Thanking you.

Yours faithfully,

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C.E., SLDC, WBSETCL

WBSETCL

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Comments for CERC DSM regulations from SLDC/WBSETCL:

Clause No.	As per Draft Regulation	Amendment proposed	Reason
7(1)	<p>Normal Rate of Charges:</p> <p>“Provided that in cases where there is no dispatch of Ancillary services in a time block or where the net charges for ancillary services are receivable in Deviation and Ancillary services Pool Account, the Ancillary Service Charge shall not be considered for computation of Normal Rate (NR). Further 50% weight shall be considered for ACP(in Paise.KWh) of the Integrated-Day Ahead Market segments, and 50% weight shall be ACP(in paise/kWh) of the RTM segments of all the Power Exchanges:</p>	<p>For the blocks where net charges for ancillary services are receivable, that should also be included in the determination of the Normal Rate with a negative sign.</p>	<p>Incorporation of the receivable net block-wise charges will further strengthen the GRID stability as the Normal rate will be more aligned to the frequency vector.</p>
8/(7)(I), (II) & (III)	<p>(I) For VLB (I) and f within f band</p> <p>i) @ 85% of NR NR when $f = 50.00$ Hz;</p> <p>ii) When $50.00 \text{ Hz} < f \leq 50.05 \text{ Hz}$, for every increase in f by 0.01 Hz, charges for deviation for such buyer shall be decreased by 7% of NR so that charges for deviation become 50% of NR when $f = 50.05 \text{ Hz}$;</p> <p>iii) When $49.90 \leq f < 50.00 \text{ Hz}$, for every decrease in f by 0.01 Hz, charges for deviation for such buyer shall be increased by 1 % of NR so that charges for deviation become 95% of NR when $f = 49.90 \text{ Hz}$;</p> <p>(II) For VLB (I) and f outside f band</p>	<p>During under-drawal by a buyer when $49.9 < f < 50.0$ the charges of deviation for such buyer should increase by 1.5% for every 0.01 Hz decrease in frequency so that the deviation charge becomes = 100% of Normal Rate when frequency is 49.90 HZ and lower.</p>	<p>This is to properly incentivise a buyer for helping the grid during low frequency.</p>

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	<p>(i) @ zero when [50.05 Hz < f < 50.10 Hz]: Provided that such buyer shall pay @ 10% of NR when [f ≥ 50.10 Hz];</p> <p>(ii) @ 95% of NR when [f < 49.90 Hz];</p> <p>(III) For VLB (2) and f within and outside f band</p> <p>(i) @ 80% of NR when f ≤ 50.00 Hz;</p> <p>(ii) @ 50% NR when [50.00 Hz < f ≤ 50.05 Hz]; @ zero when [50.05 Hz < f < 50.10 Hz]: Provided that such buyer shall pay @10% of NR when [f ≥ 50.10 Hz];</p> <p>(IV) For VLB (3) and f within and outside f band</p> <p>(i) @ zero when f < 50.10 Hz: Provided such buyer shall pay @ 10% of NR when [f ≥ 50.10 Hz];</p>		
9/ (7)	<p>“In case of deficit in the Deviation and Ancillary Service Pool Account of a region, the surplus amount available in the Deviation and Ancillary Service Pool Accounts of other regions shall be used for settlement of payment under clause (6) of this Regulation: Provided that in case the surplus amount in the Deviation and Ancillary Service Pool Accounts of all other regions is not sufficient to meet such deficit, the balance amount shall be recovered from the drawee DICs - (i) for the period from the date of effect of these regulations till 31.03.2025, in the ratio of [50%</p>	<p>The meeting of shortfall when the surplus amount in the Deviation and Ancillary Service Pool Accounts of all other regions is not sufficient should be recovered from all POOL participants instead of only the drawee DIC's.</p>	<p>As a stable grid is beneficial to all utilities whether they are buyer or seller and the surplus amount in the DSM & AS pool accounts are used for deployment of ancillary services which stabilizes the GRID in turn helping all the utilities.</p> <p>Equally when there is a deficit in the DSM & AS pool accounts, all members of the POOL(both</p>

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	<p>in proportion to their drawal at the regional periphery] and [50% in proportion to their GNA]; and (ii) from 01.04.2025, in the ratio of the shortfall of reserves allocated by NLDC to such DICs in accordance with the detailed procedure to be issued in this regard by the NLDC with the approval of the Commission”</p>		<p>buyers/sellers) should participate in replenishing the POOL accounts.</p>
10.	<p>Schedule of Payment of charges for deviation</p>	<p>Another clause may be added: In case an entity is Receivable from the Deviation & Ancillary services pool account, the Receivable amount should be credited to that entity within 7 days of the publishing of the bill and if this credit does not happen then the entity should receive 0.04% per day interest for each day of delay.</p>	<p>This is to provide some equality in the collection and disbursement of DSM charges.</p>

Response
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