

PCKL views/comments on the “Draft Central Electricity Regulatory Commission (Deviation mechanism and related) Regulation 2024” is as mentioned below:

## **6.Computation of Deviation:**

(2) Deviation in a time block for WS sellers shall be computed as follows:

Deviation-WS seller (DWS) (in MWh) = [(Actual Injection in MWh) – (Scheduled generation in MWh)]. Deviation-WS seller (DWS) (in %) =  $100 \times \frac{[(Actual\ Injection\ in\ MWh) - (Scheduled\ generation\ in\ MWh)]}{[(Available\ Capacity)]}$ .

## **Submission:**

Government of India aims to achieve Renewable Energy install capacity by 2030 would be 500GW. The future demand shall be met through renewable energy source with the storage solution. Therefore, accuracy in forecasting should be very minimal. In this connection, it is proposed to modify as below:

**Deviation-WS seller (in %) =  $100 \times \frac{[(Actual\ Injection\ in\ MWh) - (Scheduled\ generation\ in\ MWh)]}{[(Available\ Capacity)]} \times \frac{[(Scheduled\ generation\ in\ MWh)]}{[(Scheduled\ generation\ in\ MWh)]}$ .**

## **7. Normal Rate of Charges for Deviations:**

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 Service 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 Real-Time Market segments of all the Power Exchanges: Provided further that in case of non- availability of ACP for any time block on a given day, ACP for the corresponding time block of the last available day shall be considered.

**Submission:**

Presently the cap rate fixed at Rs. 10/kWh in the exchange transaction. The cap rate shall be considered for deviation also.

Further, methodology to charging deviations charges has differing that computation of ACP and Integrated Day ahead Market rates.

**8 (8). The charges for deviation for injection of infirm power shall be zero: Provided that upon such infirm power being scheduled, the charges for deviation for such power shall be as applicable for a general seller or WS seller, as the case may be.**

**Submission:**

The infirm power is not scheduling the charges applicable to such generation may be indicated in the regulation.

**8 (9). The charges for deviation for drawal of start-up power before the COD of a generating unit or for drawal of power to run the auxiliaries during the shut-down of a generating station shall be payable at the reference charge rate or contract rate or in the absence of reference charge rate or contract rate, the weighted average ACP of the Day Ahead Market segments of all Power Exchanges for the respective time block, as the case may be.**

**Submission:**

In case of shut down of the generating plant for a period of month, the contract rate for the month is not available, Hence, contract rate applicable for the preceding month shall be considered.