

Director
SLDC



U.P. State Load Despatch Centre Ltd

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No: 27/Dir(SLDC)/DSM 2024/Comments

Dated: 21 May, 2024

To,

Secretary,

Central Electricity Regulatory Commission,

3rd & 4th Floor, Chanderlok Building,

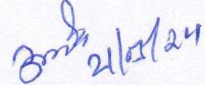
36, Janpath New Delhi- 110001.

E-mail: secy@cercind.gov.in, advisor-re@cercind.gov.in

Sub: Comments on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2024.

This is with reference to Hon'ble CERC public notice no. L-1/260/2021/CERC dated 30.04.2024 wherein comments on the subject matter have been sought.

In view of the above, views/suggestions of Uttar Pradesh State Load Despatch Centre are enclosed herewith as Annexure-I.


(A.K.Mishra)
Director (SLDC)

Comments on Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2024

CLAUSE NO	CLAUSE	COMMENTS FROM UPSLDC
Clause 6(2)	Deviation-WS seller (DWS) (in %) = $100 \times \frac{[(\text{Actual Injection in MWh}) - (\text{Scheduled generation in MWh})]}{[(\text{Available Capacity})]}$	Deviation-WS seller (DWS) (in %) = $100 \times \frac{[(\text{Actual Injection in MWh}) - (\text{Scheduled generation in MWh})]}{[(50 \% \text{ of (Available Capacity)} + (50 \% \text{ of (Scheduled generation)})]}$. There is need to change in calculation of Deviation-WS seller (DWS) (in %) by replacing available capacity in denominator to scheduled generation since Available capacity is not related to actual generation.
Clause 7(1)	(1) The Normal Rate (NR) for a particular time block shall be equal to the sum of: (a) 1/3 [Weighted average ACP (in paise/kWh) of the Integrated-Day Ahead Market segments of all the Power Exchanges]; (b) 1/3 [Weighted average ACP (in paise/kWh) of the Real-Time Market segments of all the Power Exchanges]; and (c) 1/3 [Ancillary Service Charge (in paise/kWh) computed based on the total quantum of Ancillary Services deployed and the net charges payable to the Ancillary Service Providers for all the Regions].	Normal rate for a particular time block shall be capped at maximum rate of RTM/DAM, whichever is higher (Presently Rs 10/KWh). Also, rate of Ancillary service to be available in real time
Clause 8 (7)(IV)	Deviation by way of under drawal (Receivable by the Buyer) For VLB (3) and f within and outside f band (i) @ zero when $f < 50.10$ Hz: Provided	Under-drawal by a buyer during low frequency is supportive for the grid and hence needs to be incentivized to bring frequency within operating band. There

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	such buyer shall pay @ 10% of NR when [$f \geq 50.10$ Hz];	should no volume limit when frequency is below 49.90 Hz.
	Deviation by way of over drawal (Payable by the Buyer) For VLB (3) and f within and outside f band (ii) @ 200% of NR when $f < 50.00$ Hz (iii) @ 110% of NR when $f \geq 50.00$ Hz	Over-drawal by a buyer during high frequency ($f \geq 50.05$ Hz) is supportive for the grid and hence needs to be incentivized to bring frequency within operating band. No additional penalty to be imposed on buyer when $f \geq 50.05$ Hz.
Clause 8 (12)	Notwithstanding anything contained in Clauses (1) to (5) of this Regulation, in case of forced outage of a seller, the charges for deviation shall be @ the reference charge rate for a maximum duration of eight time blocks or until the revision of its schedule, whichever is earlier	Presently in case of forced outage, Schedule/DC revision is applicable from 07/08 th time block in interstate transactions. Provisions to revise schedule/ DC from earliest possible block shall be considered in case of forced outage.
Additional Comments		
1.	In case of major generation loss (say more than 3000MW as it happens in major solar pockets) due to transmission constraint or abnormal weather condition, though actual generation becomes zero but states keep on drawing power as per their drawal schedule. To address this issue in such unforeseen conditions, drawal schedule should revise from N+2 basis to keep frequency in normal operating band.	
2.	In case of major load loss (Load crash report on 10.05.2024 is enclosed as Annexure-A) due to sudden change in weather conditions, It is very difficult to adhere the net drawl schedule strictly. In such condition, the deviations from net drawl schedule is uncontrollable despite of taking various measures. Provision of declaration of "Force majeure" event (such as Acts of God, natural phenomena, weather disturbance, floods, droughts, earthquakes and epidemics etc.) needs to be included in DSM regulation for safe secure and reliable grid operation. Provisions to revise schedule/ DC from N+2 time block for ISGS shall be considered in case of force majeure rather than 07/08 th time block. Also, no penalties to the concern State subsequently to the State Discoms shall be imposed in case of force majeure. Variation in weather forecast w.r.t to actual weather to be also included in force majeure condition.	

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Load crash Report NRLDC

1. **Date & Time of event:** 21:35 hrs to 22.57 hrs on 10.05.2024

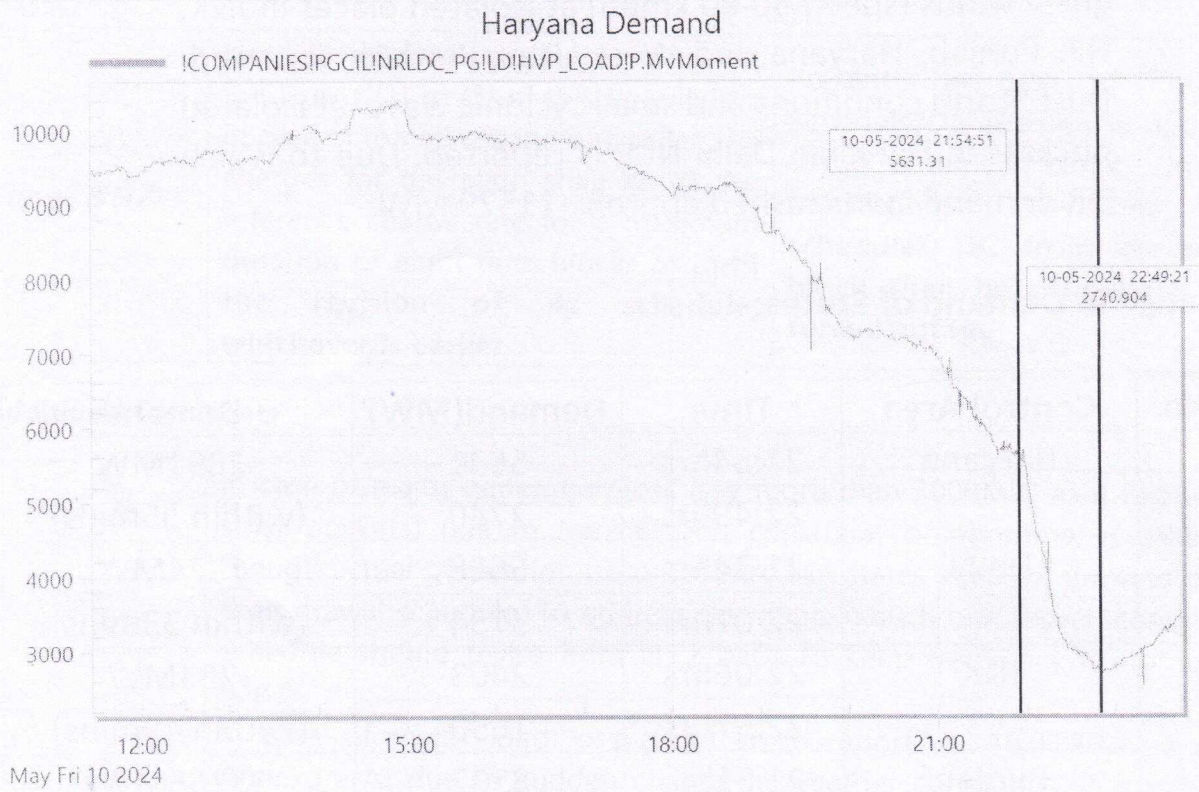
2. **Antecedent Condition:**

- **NR Demand** : 63132 MW
- **Frequency** : 50.105Hz
- **Reason:** Thunderstorm/ Lightning accompanied with gusty winds (speed 60-80 kmph) at isolated places in J&K, HP, Punjab, Haryana and West Uttar Pradesh reported. Dust Storm conditions and small cyclonic wave at isolated pockets in Haryana, Delhi NCR is reported. Due to which NR demand load crashed approx. -11579 MW.

3. **Change in Demand of States:**

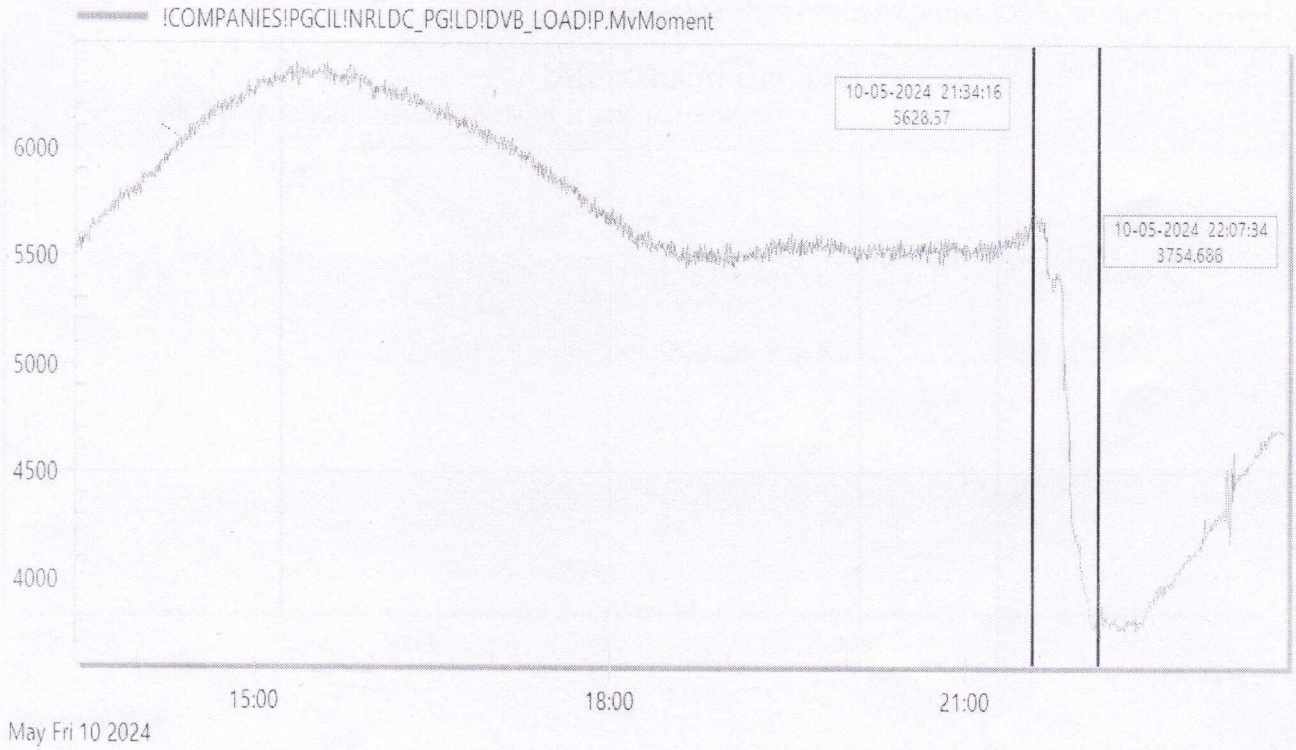
Sr. No.	Control Area	Time	Demand(MW)	Demand
1.	Haryana	21:54hrs	5631	-2891MW (within 55mins)
		22:49hrs	2740	
2.	Delhi	21:34hrs	5628	-1874MW (within 33mins)
		22:07hrs	3754	
3.	J&K	22:06hrs	2403	-753MW (within 49mins)
		22:57hrs	1650	
4.	Punjab	21:51hrs	8507	-3266MW (within 112mins)
		23:43hrs	5241	
5.	Uttarakhand	22:30hrs	2150	-289MW (within 25mins)
		22:55hrs	1861	
6.	UP	21:42	25370	-4400 (within 60 min)
		22:51	20970	
7.	NR	21:44hrs	63132	-11579MW (within 86mins)
		23:10hrs	51553	

4. Haryana Demand:



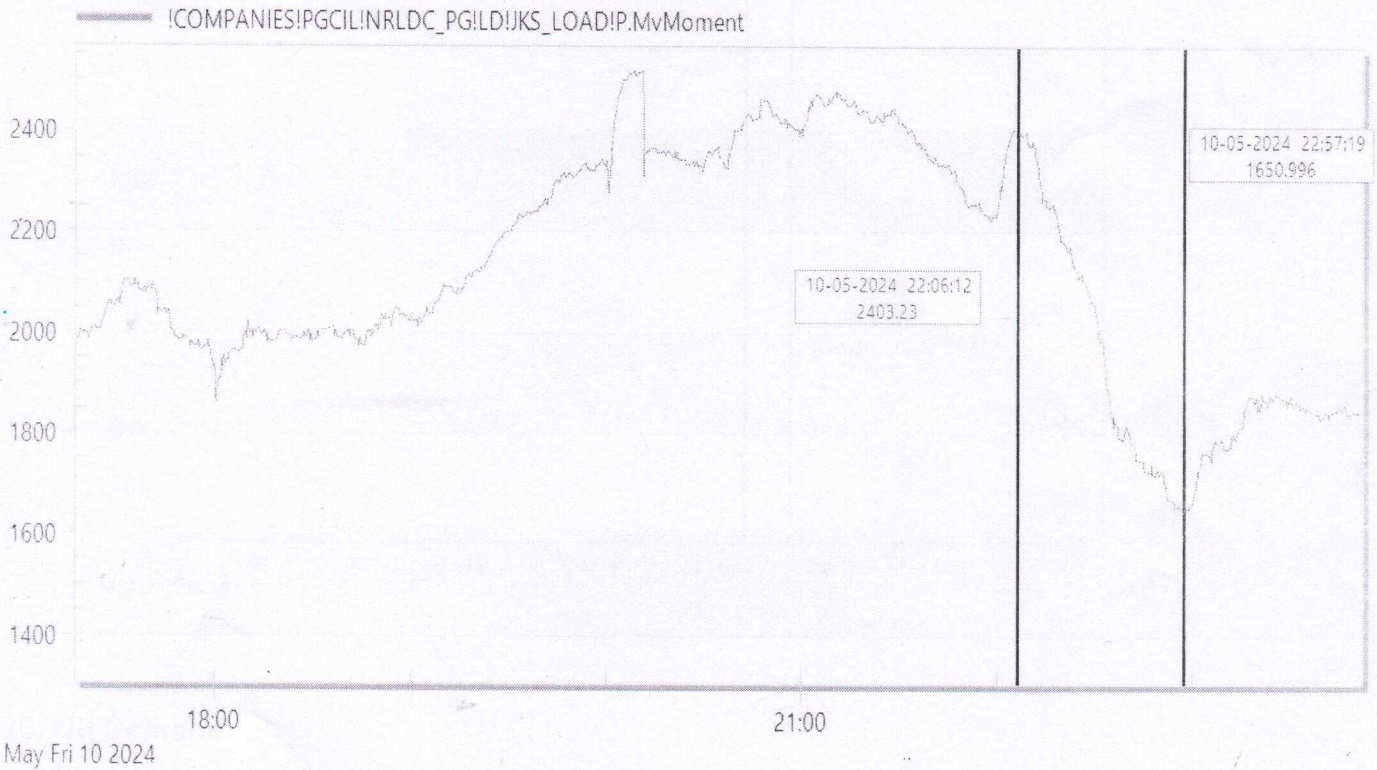
5. DELHI DEMAND

Delhi Demand



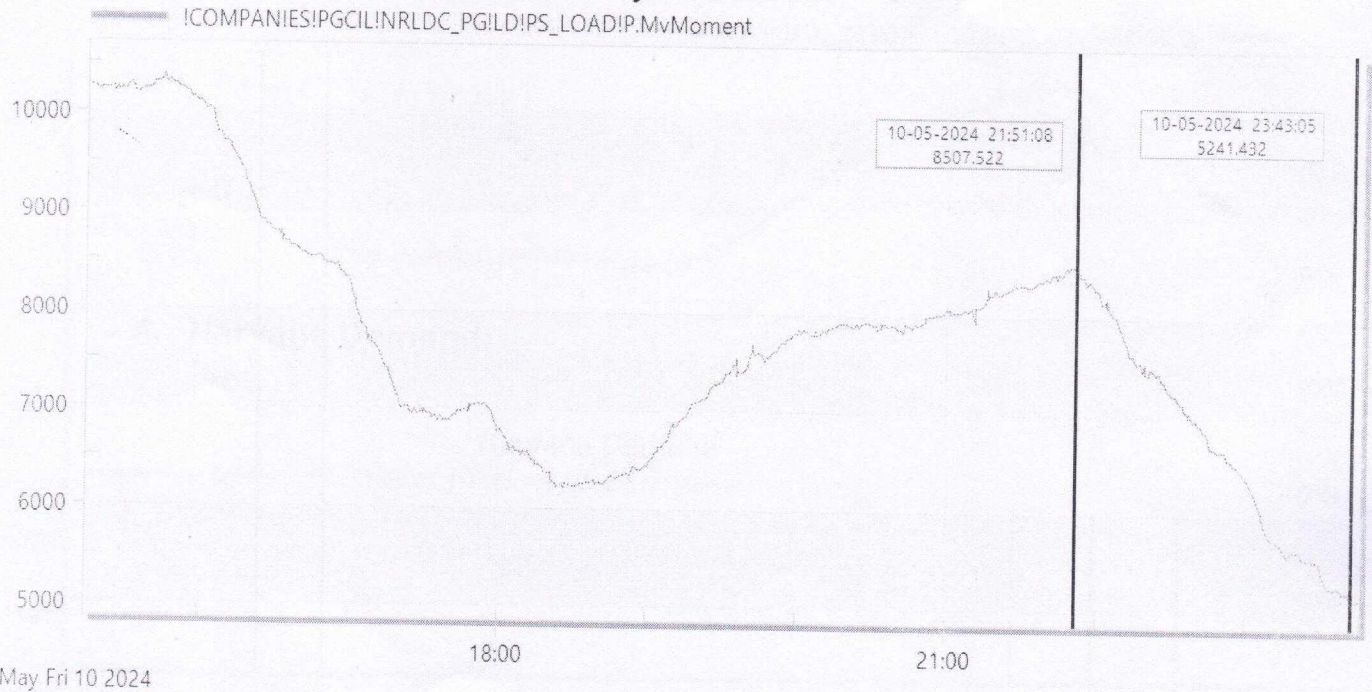
6. J&K Demand

JK Demand

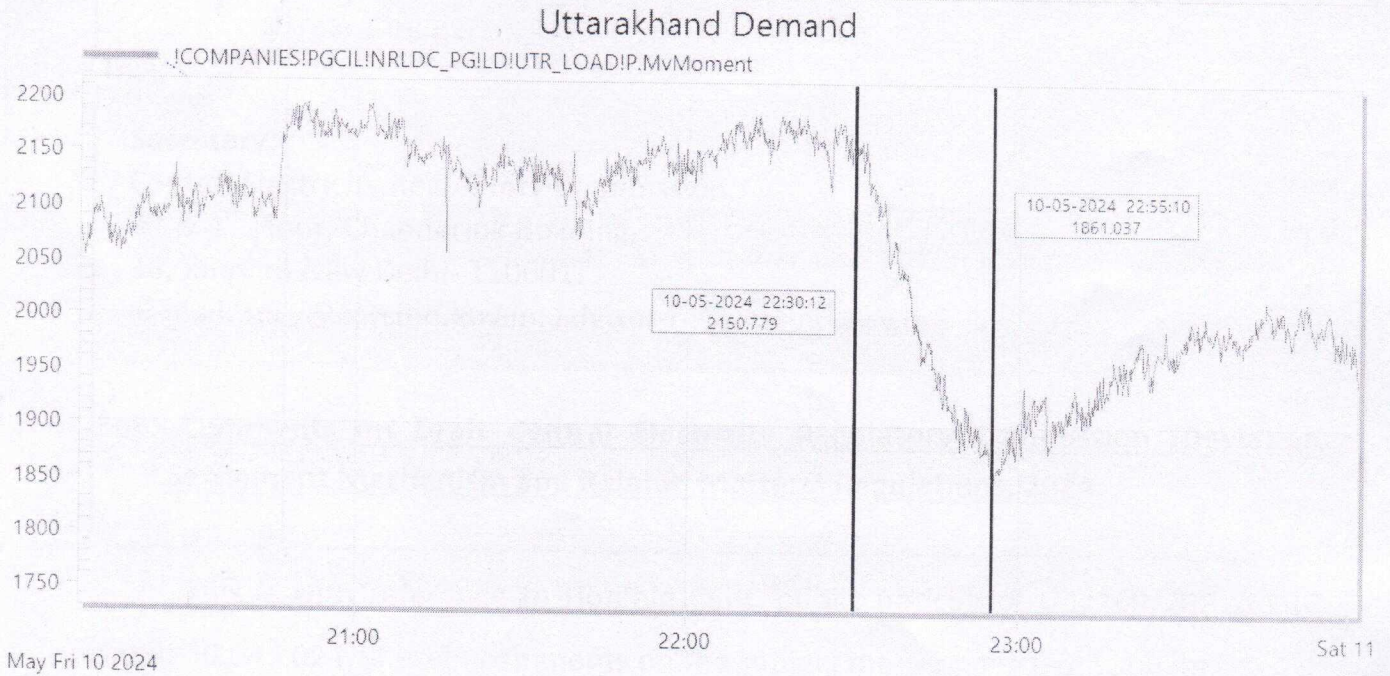


7. Punjab Demand

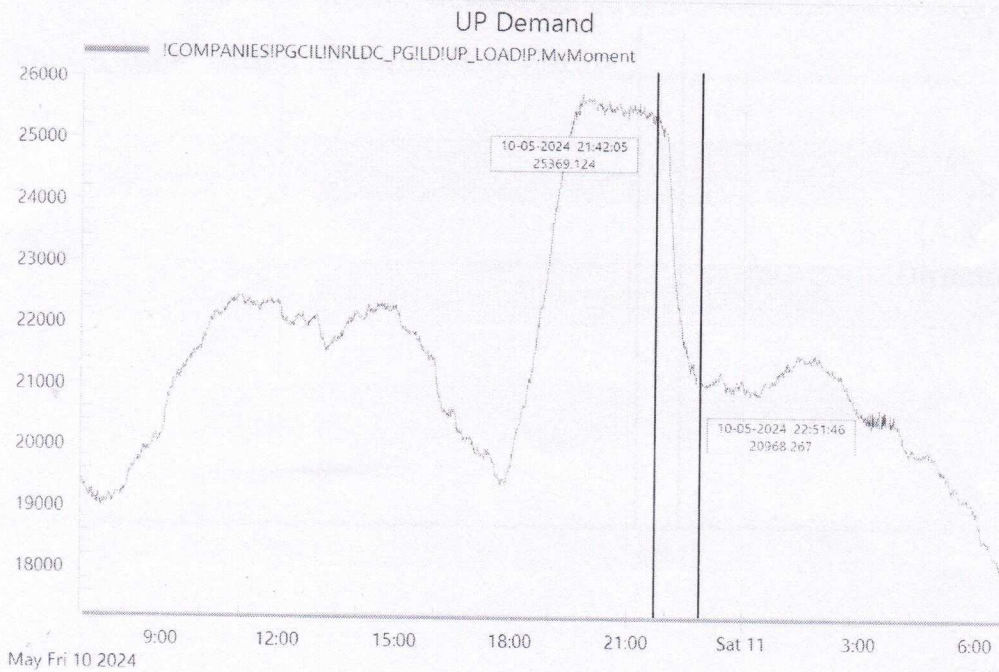
Punjab Demand



8. Uttarakhand Demand

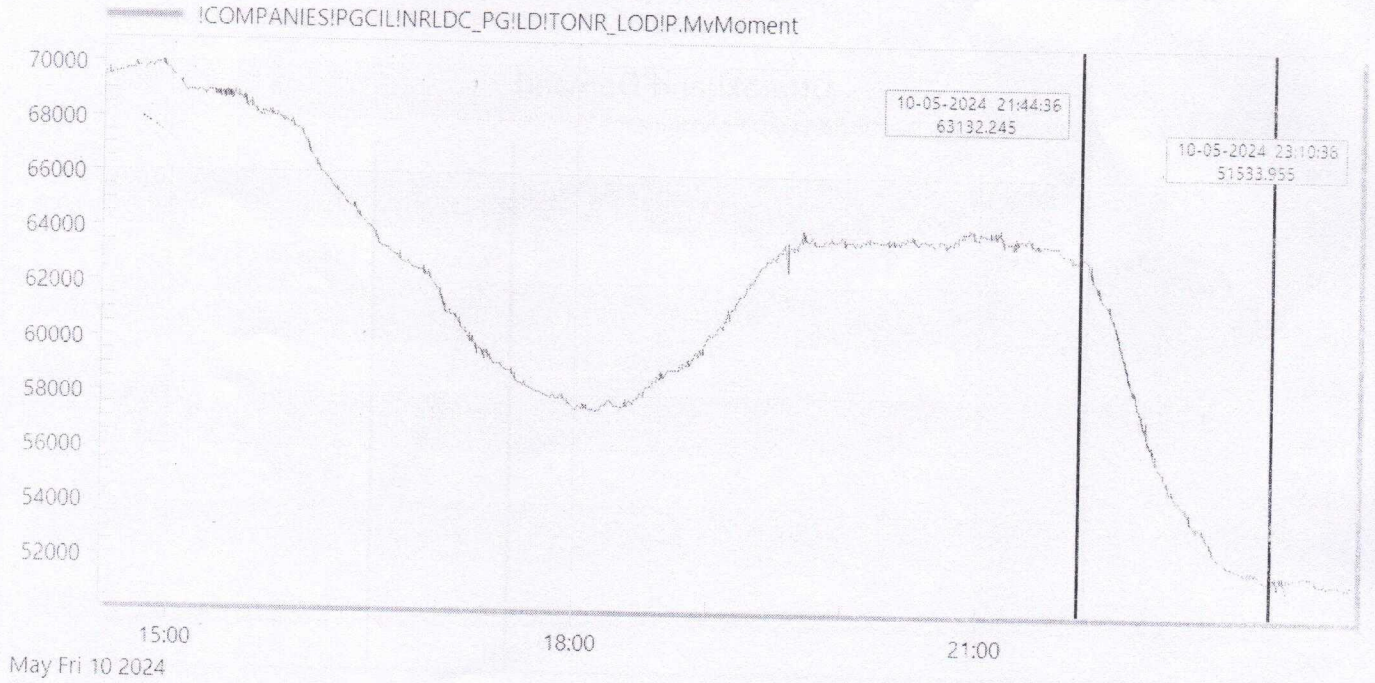


9. UP Demand

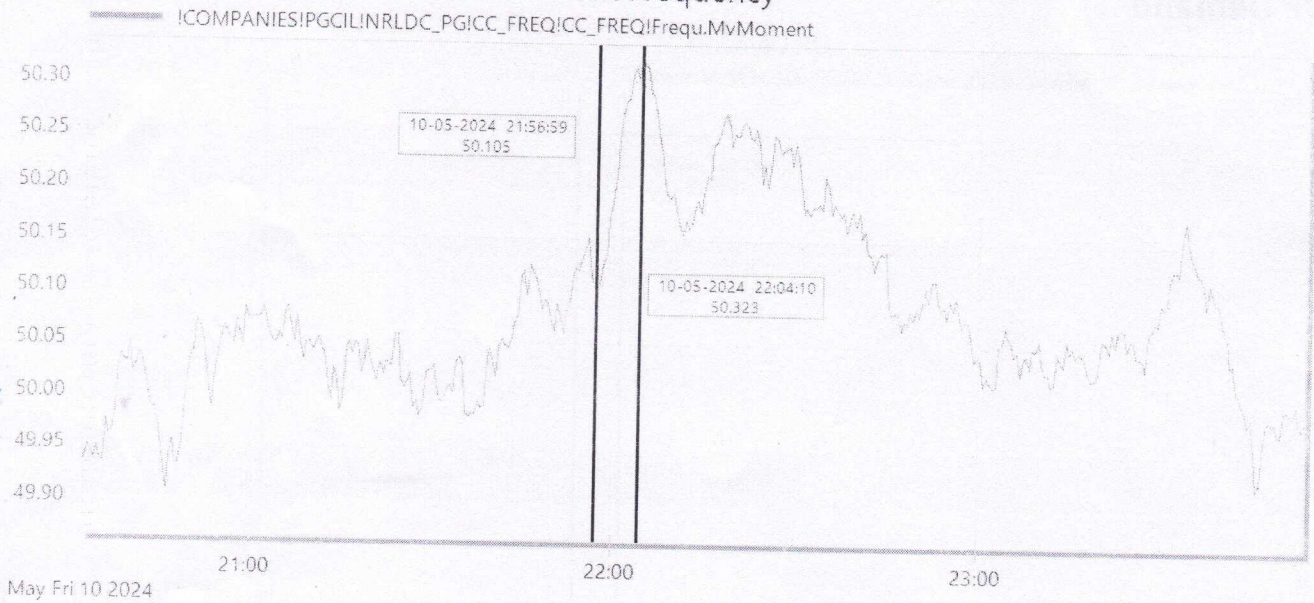


10. NR Demand

NR Demand



NR Frequency



SCM – Sh. Anil Kumar

Engineers – Sh. Rahul Kumar, Sh. Yug Varshney, Sh. Bhanumurthy, Sh. Amit Sharma