

EDG's Comments and Suggestions regarding the Draft CERC (Deviation Settlement Mechanism and Related Matters) Regulations, 2024.

Electricity Department, Goa (EDG) has gone through the proposed Draft CERC (Deviation Settlement Mechanism and Related Matters) Regulations, 2024 dated 30.4.2024 issued by Hon`ble Commission.

EDG would like to provide its comments for Commission`s consideration.

At the outset, EDG would like to highlight that Goa as a state, does not have its own generation. Most of the power requirement for the State of Goa is met through its share from Central Sector Power Stations of NTPC Ltd. as allocated by the Central Government.

EDG would like to highlight from its perspective and some similar UTs in the country, that since demand is uncontrollable and the state/UTs have no control over the generation, hence, we would be adversely affected in case of more stringent norms.

From our understanding of the draft regulation, following are the changes proposed in the existing DSM charges from discoms/buyer perspective:

Comparison: Proposed DSM regulation Vs Current DSM Regulation:

1. For Deviation up to 10% DGS or 100 MW, whichever is less				
Frequency	Under Drawal (Receivable by Buyer)*		Over Drawal (Payable by Buyer)*	
	Current	Proposed	Current	Proposed
50.10	0.00	-0.10	0.00	0.00
50.09	0.00	0.00	0.00	-0.50
50.08	0.00	0.00	0.00	-0.50
50.07	0.00	0.00	0.00	-0.50
50.06	0.00	0.00	0.00	-0.50
50.05	0.00	0.50	0.00	-0.75
50.04	0.50	0.57	-0.75	-0.80
50.03	0.90	0.64	-1.00	-0.85
50.02	0.90	0.71	-1.00	-0.90
50.01	0.90	0.78	-1.00	-0.95
50.00	0.90	0.85	-1.00	-1.00
49.99	0.90	0.86	-1.00	-1.05
49.98	0.90	0.87	-1.00	-1.10
49.97	0.90	0.88	-1.00	-1.15
49.96	0.90	0.89	-1.00	-1.20
49.95	0.90	0.90	-1.00	-1.25
49.94	1.20	0.91	-1.50	-1.30
49.93	1.20	0.92	-1.50	-1.35
49.92	1.20	0.93	-1.50	-1.40
49.91	1.20	0.94	-1.50	-1.45
49.90	1.50	0.95	-2.00	-1.50
49.89	1.50	0.95	-2.00	-1.50

* multiples of DSM rate

2. For Deviation Between 10% or 100 MW to 15% or 200 MW, whichever is less				
Frequency	Under Drawal (Receivable by Buyer)*		Over Drawal (Payable by Buyer)*	
	Current	Proposed	Current	Proposed
50.10	0.00	-0.10	0.00	0.00
50.09	0.00	0.00	0.00	-0.75
50.08	0.00	0.00	0.00	-0.75
50.07	0.00	0.00	0.00	-0.75
50.06	0.00	0.00	0.00	-0.75
50.05	0.00	0.50	0.00	-1.00
50.04	0.50	0.50	-0.75	-1.00
50.03	0.50	0.50	-1.20	-1.00
50.02	0.50	0.50	-1.20	-1.00
50.01	0.50	0.50	-1.20	-1.00
50.00	0.50	0.80	-1.20	-1.50
49.99	0.50	0.80	-1.20	-1.50
49.98	0.50	0.80	-1.20	-1.50
49.97	0.50	0.80	-1.20	-1.50
49.96	0.50	0.80	-1.20	-1.50
49.95	0.50	0.80	-1.20	-1.50
49.94	1.20	0.80	-1.50	-1.50
49.93	1.20	0.80	-1.50	-1.50
49.92	1.20	0.80	-1.50	-1.50
49.91	1.20	0.80	-1.50	-1.50
49.90	1.50	0.80	-2.00	-1.50
49.89	1.50	0.80	-2.00	-1.50

* multiples of DSM rate

3. For Deviation Beyond 15% or 200 MW, whichever is less				
Frequency	Under Drawal (Receivable by Buyer)*		Over Drawal (Payable by Buyer)*	
	Current	Proposed	Current	Proposed
50.10	0.00	-0.10	0.00	-1.10
50.09	0.00	0.00	0.00	-1.10
50.08	0.00	0.00	0.00	-1.10
50.07	0.00	0.00	0.00	-1.10
50.06	0.00	0.00	0.00	-1.10
50.05	0.00	0.00	0.00	-1.10
50.04	0.50	0.00	-0.75	-1.10
50.03	0.00	0.00	-1.50	-1.10
50.02	0.00	0.00	-1.50	-1.10
50.01	0.00	0.00	-1.50	-1.10
50.00	0.00	0.00	-1.50	-2.00
49.99	0.00	0.00	-1.50	-2.00
49.98	0.00	0.00	-1.50	-2.00
49.97	0.00	0.00	-1.50	-2.00
49.96	0.00	0.00	-1.50	-2.00
49.95	0.00	0.00	-1.50	-2.00
49.94	1.20	0.00	-1.50	-2.00
49.93	1.20	0.00	-1.50	-2.00

49.92	1.20	0.00	-1.50	-2.00
49.91	1.20	0.00	-1.50	-2.00
49.90	1.50	0.00	-2.00	-2.00
49.89	1.50	0.00	-2.00	-2.00

** multiples of DSM rate*

EDG submits that:

1. EDG observed that in the frequency range of 50.00Hz to 49.95Hz, buyers bear substantial losses in case of inadvertent deviations from the drawal schedule. Under-drawals result in buyers receiving only 85% to 90% of the Normal Rate (NR), while over-drawals require buyers to pay 100% to 125% of NR. This will result in loss to the discom/state due to Inadvertent & uncontrollable Deviation. This discrepancy is unfairly punitive and should be in lines with the current DSM charges.

Further, the introduction of a 10% NR penalty for under-drawal at frequencies of 50.10 Hz or higher is a new clause. Previously, there was no penalty for such cases. This new penalty should not be levied and be reconsidered.

2. EDG observed that the proposed regulations have reduced the incentive for discoms to provide grid support through over-drawal or under-drawal across nearly all frequency ranges. This should be reconsidered and be in lines with the current DSM charges.

Further, the incentives for supporting the grid by deviating beyond prescribed limits have been significantly reduced. This can have a negative impact on discoms/state willingness to assist in grid stability during critical periods.