



West Bengal State Electricity Distribution Company Limited

(A Government of West Bengal Enterprise)
Vidyut Bhavan (4th floor) DJ Block, Sec-II Salt Lake, Kolkata- 700 091
CIN: U40109WB2007SGC113473, Web: www.wbsedcl.in,
e-mail: cereg@wbsedcl.in
Telephones : 2359-8391, Extn-364
Regulation Cell

Memo. No. : REG/CERC/ 81

Date :22/05/2024

To
The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building, 36, Janpath,
New Delhi-110001.

Sub: Comments/ Suggestion of WBSEDCL on the draft Central Electricity
Regulatory Commission (Deviation Settlement Mechanism and Related
Matters) Regulations, 2024.

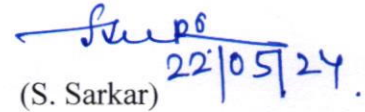
Ref: Public Notice of CERC under Memo. L-1/260/2021/CERC dated
30.04.2024.

Sir,

With refernce to above, comments/ Suggestion of WBSEDCL on the draft Central
Electricity Regulatory Commission (Deviation Settlement Mechanism and Related
Matters) Regulations, 2024 is attached for your consideration please.

Enclo: As stated

Yours faithfully,


22/05/24.

(S. Sarkar)

Chief Engineer (Regulation)

Observation of WBSEDCL on draft CERC DSM Regulations, 2024

Ref: Public Notice of CERC under Memo. L-1/260/2021/CERC dated 30.04.2024.

Clause No.	As per Draft Regulation	Amendment proposed	Reason
8/(7)/(I) , (II) & (III)	<p>(I) For VLB (1) and f within f_{band} i) @ 85% of NR NR when $f = 50.00$ Hz; 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 (1) and f outside f_{band} (i) @ zero when $[50.05 \text{ Hz} < f < 50.10 \text{ Hz}]$: Provided that such buyer shall pay @ 10% of NR when $[f \geq 50.10 \text{ Hz}]$; (ii) @ 95% of NR when $[f < 49.90 \text{ Hz}]$;</p> <p>(III) For VLB (2) and f within and outside f_{band} (i) @ 80% of NR when $f \leq 50.00 \text{ Hz}$; (ii) @ 50% NR when $[50.00 \text{ Hz} < f \leq 50.05 \text{ Hz}]$</p>	<p>(I) For VLB (1) and f within f_{band} i) @ 85%100% of NR NR when $f = 50.00 \text{ Hz}$; 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 710% 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 11.5 % of NR so that charges for deviation become 95115% of NR when $f = 49.90 \text{ Hz}$;</p> <p>(II) For VLB (1) and f outside f_{band} (i) @ zero when $[50.05 \text{ Hz} < f < 50.10 \text{ Hz}]$: Provided that such buyer shall pay @ 10% of NR when $[f \geq 50.10 \text{ Hz}]$; (ii) @ 95115% of NR when $[f < 49.90 \text{ Hz}]$;</p> <p>(III) For VLB (2) and f within and outside f_{band} i) @ 80% of NR when $f \leq 50.00 \text{ Hz}$; (ii) @ 50% NR when $[50.00 \text{ Hz} < f \leq 50.05 \text{ Hz}]$; @ zero when $[50.05 \text{ Hz} < f < 50.10 \text{ Hz}]$;</p>	<p>During downward trend of frequency from 50Hz., any deviation irrespective of source, which causes injection of power towards the grid should be encouraged with commercial incentive with a view to arrest further frequency fall. In such cases, both the Over injection from Seller/Generators & Under drawl from the Buyers have equal technical importance for improving Grid stability.</p> <p>But as per the draft Regulations, Sellers /Generators have been encouraged for over injection with additional financial incentive up to 50% whereas for the Buyer no such incentive has been proposed for their under drawl. Even the full DSM charge is not allowed to buyers for their under drawl under such condition. Buyers have been allowed maximum upto 95% of DSM charge (under VLB1 condition) even when the frequency is at any value below 49.90Hz.</p> <p>Hence, such commercial discriminatory treatment, as proposed in the draft Regulations, is required to be reviewed by the Honorable Commission for the purpose of effectively maintaining the Grid stability.</p>


 22/05/24
 Chief Engineer (Regulation)
 Regulation Department
 WBSEDCL

Observation of WBSEDCL on draft CERC DSM Regulations, 2024

Ref: Public Notice of CERC under Memo. L-1/260/2021/CERC dated 30.04.2024.

Clause No.	As per Draft Regulation	Amendment proposed	Reason
	<p>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} (i) @ zero when f < 50.10 Hz: Provided such buyer shall pay @ 10% of NR when [f ≥ 50.10 Hz];</p>	<p>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} (i) @ zero when f < 50.10 Hz: Provided such buyer shall pay @ 10% of NR when [f ≥ 50.10 Hz];</p>	
8/(7)/Note (para-2)	<p>Note: Volume Limits for Buyer: Buyer (with a schedule up to 400 MW) VLB (1) = Deviation [20% DBUY or 40 MW, whichever is less] VLB (2) = Deviation beyond [20% DBUY or 80 MW, whichever is less]</p>	<p>Segregation of DISCOM size in terms of schedule may not be considered.</p>	<p>The segregation of DISCOM size in terms of schedule was introduced by the Hon'ble Commission with some relaxation in deviation volume limit vide Order against Petition No. RP/06/2014.</p> <p>At the time of issuance of such order, there was nothing close to Real Time Market (RTM) Product in the market, so that small DISCOMs can tune their wide Deviation in real time precisely. At that time they had to depend on DAM & TAM product only for deviation management.</p> <p>With the successful implementation of Real Time market with effect from 1st June, 2020, which is now quite matured at present scenario and enables market participants to manage their real time Deviation comfortably.</p>


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