

Shri Harpreet Singh Pruthi
Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building
36, Janpath, New Delhi- 110001

Date: 05.11.2024

Subject: Comments on CERC Public Notice on "Directions by the Commission to the Power Exchanges registered under the Central Electricity Regulatory Commission (Power Market) Regulations, 2021"

Dear Shri Pruthi Sir,

This is with reference to the Public Order dated 04th October, 2024 for the Comments on the **Directions by the Commission to the Power Exchanges registered under the Central Electricity Regulatory Commission (Power Market) Regulations, 2021.**

I have gone through it and record some of my comments on the same. Additional suggestions are also provided for consideration of the Commission.

I would be pleased to address any clarification, if required.

Yours Faithfully,

For Lanco Kondapalli Power Limited



Ashif Ahmed
9818183897

Lanco Kondapalli Power Limited

(A Radha Group Company)

CIN: U40101TG1995PLC021459

Registered Office:

4th Floor, Mahaveer Radiance, Plot No.53,54,57,58, Survey no.43 & 44,
Pillar No.1708, Kavuri Hills, Madhapur, Hyderabad-500081, Telangana, India.

T : +91 40 4014 2774 | www.lancopower.in

Plant:

IDA, Kondapalli, Ibrahimpatnam Mandal - 521 228,
NTR District, A.P., India.

Comments

1. On course of withdrawing Intra-Day Contracts from all the Power Exchanges from prespecified date, there is no surety to get full volume clearance in RTM to meet contingent requirement.
2. RE-rich State/ RE Super-rich State comes up with an inherent nature of Injection variability from RE Plants. On sudden demand of power by such state's utilities, there may be occurrence of partially/no clearance at all in RTM (where surety to avail full power for purchase/sale is not firm for buyer/seller to schedule a transaction). Due to this market participants would have no other products available to meet their demand in contingent situation. On such an event there may be situation of grid in-stability due to over-drawl by utility which would be against the ethos as guided in DSM regulation.
3. Due to nature of Indian electricity market (liquidity attracts liquidity) only one exchange is Leading to serve in RTM segment, as other exchanges have almost nil presence due to very low liquidity at their platform. So, it will be like passing on the entire responsibility of meeting the power requirement in real time to the leading exchange. In the event of RTM sessions aborted at leading exchange, where would the utilities look forward to get power? Also, it will lead to monopolised market as other two trailing exchange would not have any contract to compete for as maximum RTM volume till date is with the leading exchange due to nature of electricity market.
4. There may be situations where a gas-based power plants gets a transaction order in Day Ahead Contingency. To meet this transaction order, gas-based plant require sufficient Ramp-up (at starting) or Ramp-Down (at shut down). If the required Ramp- UP/ Ramp-Down power not got fully cleared in RTM segment than it will be difficult to meet the transaction obligation.
5. As there is no High Price RTM product, it would be detrimental to the HP-Sellers/peaking plants as they enter sell bid in HP-Intra Day Contract (in very high demand situation) to secure its Ramp-UP/Down power requirement to start/Shut Down Gas based Power Station.

Suggestions

1. There should be assurance of getting full power cleared in RTM at exchange platform.
2. In contingent situation, if RTM sessions aborted, there should be financial implications.
3. If Intraday market at all exchanges is withdrawn, then the whole responsibility of meeting demand on contingent situation will shift (without any effort) towards leading exchange, which may be risky in case of events like RTM sessions abort.
4. Withdrawal of Intraday market can be delayed up to Market coupling.

Lanco Kondapalli Power Limited

(A Radha Group Company)

CIN: U40101TG1995PLC021459

Registered Office:

4th Floor, Mahaveer Radiance, Plot No.53,54,57,58, Survey no.43 & 44,
Pillar No.1708, Kavuri Hills, Madhapur, Hyderabad-500081, Telangana, India.

T : +91 40 4014 2774 | www.lancopower.in

Plant:

IDA, Kondapalli, Ibrahimpatnam Mandal - 521 228,
NTR District, A.P., India.