एनटीपीसी लिमिटेड
(भारत सरकार का उद्यम)
NTPC Limited
(A Govt. of India Enterprise)

Date: 17.10.2025

The Secretary
Central Electricity Regulatory Commission,
7th floor, Tower-B, World Trade Centre
Nauroji Nagar, New Delhi-110029

Subject: NTPC Submissions on the order dated 10.09.2025 in Petition No. 9/SM/2025 regarding determination of value of "X".

Sir,

Hon'ble Commission, vide order dated 10.09.2025 in Petition No. 9/SM/2025, has sought comments of stakeholders on the issues raised therein.

Please find enclosed submissions of NTPC in this regard.

Thanking you.

Yours sincerely

(Ajay Dua)

ED (Commercial)

NTPC Submissions on order dated 10.09.2025 in Petition No. 9/SM/2025 regarding determination of value of "X" for computation of the deviation (in %) for WS Sellers

1. **Company-wide Aggregate scheduling for all the generators falling under a single RLDC.**

   As mentioned in the order, Grid-India carried out the analysis by assuming aggregation of WS sellers at a pooling station through the Qualified Co-ordination Agency (QCA) with different values of X%. It was observed that with aggregation of the WS sellers at a pooling station, the impact of DSM charges reduces significantly. The analysis demonstrates that when the schedules and actual injections of multiple plants are combined, the overall deviation is reduced, leading to a lower revenue impact.

   Submission:

   Like aggregation at pooling substation, at regional level, the aggregate scheduling of generators owned by a generating company is likely to reduce the forecasting error and Deviation b/w SG vs AG as the forecasting is done on aggregate basis for various generators spread in a large area. Such arrangement will minimize the financial implications due to DSM on the generating companies without affecting the grid stability.

   In view of above it is submitted that a suitable regulatory provisions and procedure may be formulated to facilitate company-wide Aggregate scheduling for all the generators falling under a single Regional Load Despatch Centre.