TGSLDC - Determination of value of "X" for computation of the deviation (in %) for Wind and Solar (WS) Sellers from 01.04.2026 onwards under the provisions of the Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2024 - Reg.

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Sir,

With reference to the Notice No. L-1/260/2021/CERC, Dt: 10.09.2025 and Dt: 01.10.2025 on the above subject matter, the following are the suggestions of TGSLDC/ TGTRANSCO:

First Suggestion:
Different timelines for implementation of zero value for X for solar and wind separately if required shall be considered as the accuracy levels can be achieved much faster for solar than wind.

Second Suggestion:

1. The deviation in a time-block for WS-Seller will be calculated as below as per following regulation for all inter state WS sellers up to 31.03.2026:

i. **As per clause (2)(a) of Regulation 6 of CERC DSM Regulation 2024**

$$D_{ws}\% = 100 * \frac{[(Actual\ Injection\ in\ MWh) - (Scheduled\ \ generation\ in\ MWh)]}{[(Available\ Capacity)]}$$

The same formula is considered in TGERC RE DSM Regulations also.

ii. As per clause (2)(b) of Regulation 6 of CERC DSM Regulation 2024, the applicable regulation **from 01.04.2026** is as follows:

$$D_{ws}\% = 100 * \frac{[(Actual\ Injection\ in\ MWh) - (Scheduled\ \ generation\ in\ MWh)]}{[(X\%\ of\ Availble\ Capacity) + (100 - X\%)\ of\ Scheduled\ Generation]}$$

In the regulation, CERC specified that 'X' component in the formula will be decided separately.

2. In this regard, a sample calculation is carried out by modifying the denominator as compared to existing methodology for 05 No. generators of the State. From the analysis it is observed that the number of blocks whose deviation is less than 15% is reduced by 26% with the proposed formula as in (ii).

3. Further, deviation percentage and charges are arrived for 05 No.s generators using both the formulas. It is observed that the deviation charges arrived by the use of the **New** formula as in (ii) are abnormally very high compared to the deviation charges arrived using the **existing** formula as in (i) due to which the deviation at state level will minimise as the generators attempt to improve forecast to avoid DSM charges applicability above 15%.

4. Sufficient time is already given to WS generators to develop forecast tools predicting accurate forecasts. Allowing error calculation still with available capacity is impacting state level deviations. Further, miss declaration is possible by WS generators to reduce their DSM charges. As the large quantum of RE is integrated, accurate forecast is essential for secure operation of grid.

Conclusion on second suggestion:
Hence, it is requested to consider ‘X’ value as zero within 3 years instead of 01.04.2031 onwards as proposed in Para (22) of the CERC draft order, as the impact of deviation is very high with the existing formula. Early implementation of the proposed formula will improve grid security. A copy of analysis as per TGERC Regulation is enclosed for ready reference.

regards
TGSLDC
TGTRANSCO
Telangana

1 Attachment(s)

Deviations by 5 generators - A…
437.9 KB

Annexure-I

Table-1 - Deviations by 5 generators in April-2024 with **AVC** as denominator (Existing formula).

							No. of Deviated blocks for 30 days				
Sl.No.	**Generator Name**	**Installed Capacity**	**Fuel**	**Connected Sub-Station**	**penalty for deviation**	**No. of blocks lessthan 15%**	**15_to_25%**	**25_to_35%**	**35% above**	**Total Deviation blocks**	**Total blocks for 30 days**
1	Azure Power Thirty Seven Pvt Ltd	100	Solar	220/132 kV Kalwakurthy	56,538.55	2835	31	11	3	45	2880
2	Divine Solren Pvt Ltd	50	Solar	220/132/33 kV Nirmal	1,15,006.95	2734	99	28	19	146	2880
3	Mytrah Vayu Godavari Pvt Ltd	100.8	Wind	132/33 kV Parigi	16,47,045.69	2201	359	177	143	679	2880
4	Mytrah Adarsh Power Pvt Ltd-Thungaturthy	15	Solar	132/33kV Thungathurthy	8,315.59	2819	45	15	1	61	2880
5	Mytrah Adarsh Power Pvt Ltd-Shanigaram	15	Solar	132/33 kV Shanigaram	44,222.00	2675	135	49	21	205	2880
						13264	**669**	**280**	**187**	**1136**	**14400**

Table-2 - Deviations by 5 generators in April-2024 with **Schedule** as denominator (Proposed formula).

							No. of Deviated blocks for 30 days				
	Generator Name	**Installed Capacity**	**Fuel**	**Connected Sub-Station**	**penalty for deviation**	**No. of blocks lessthan 15%**	**15_to_25%**	**25_to_35%**	**35% above**	**Total Deviations**	**Total blocks for 30 days**
1	Azure Power Thirty Seven Pvt Ltd	100	Solar	220/132 kV Kalwakurthy	3,51,633.62	2474	160	68	178	406	2880
2	Divine Solren Pvt Ltd	50	Solar	220/132/33 kV Nirmal	6,37,398.68	2287	152	107	334	593	2880
3	Mytrah Vayu Godavari Pvt Ltd	100.8	Wind	132/33 kV Parigi	1,04,12,092.81	443	278	213	1946	2437	2880
4	Mytrah Adarsh Power Pvt Ltd-Thungaturthy	15	Solar	132/33kV Thungathurthy	74,700.20	2359	191	101	229	521	2880
5	Mytrah Adarsh Power Pvt Ltd-Shanigaram	15	Solar	132/33 kV Shanigaram	2,21,553.56	2229	224	110	317	651	2880
						9792	**1005**	**599**	**3004**	**4608**	**14400**
					Percentage change	-26%	50%	114%	1506%	306%	

Percentage reduction in number of blocks whose deviation is less than 15% due to placing of schedule generation in MWh aginst AVC in denominator

= (No. of blocks less than15% in table-2 - No. of blocks less than 15% in table-1) / No. of blocks less than 15% in table-1

= (9792-13264)/13264*100

= -26%