

Comments/ Suggestions On Rate of Congestion charge in real-time operation in ISTS

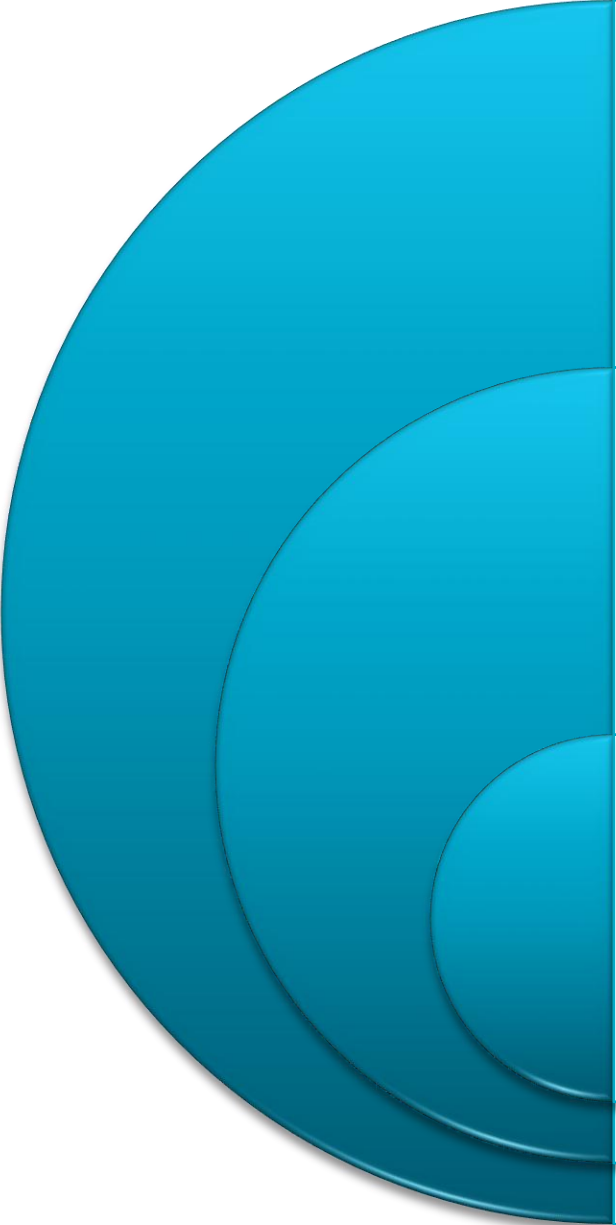


Issues

RE generators already pay DSM charges for deviations; additional congestion charges create a dual financial burden

RE generation is weather dependent, developers cannot fully mitigate under-injection caused by weather variability

The existing 2 time-block notice for congestion management is workable for conventional generators but not for RE projects due to weather-driven generation variability



Congestion charge

- Link it to the ACP (of Power Exchanges) with an upper cap of Rs. 7/kWh

Market splitting

- Allow under injecting RE generators to square off their under injection by participating in real time market.
- Enable region-specific RTM balancing for RE deviations within 2 time-blocks.
- Levy congestion charges only for non-participation in RTM balancing and promote same-region balancing.

Spinning and Capacity Reserves

- Encourage deployment of BESS at substations with high RE penetration.
- Enable primary and secondary ancillary service markets to utilize these reserves.

THANK YOU