

Ref: APL/CERC/30122016

Date: 30 12. 2016

To

The Secretary

Central Electricity Regulatory Commission
3rd and 4th Floor, Chanderlok Building
36 Janpath, New Delhi -110001

Subject: Comments on Draft CERC (Indian Electricity Grid Code) (Fifth Amendment) Regulations, 2016

Dear Sir

With reference to the comments invited by the Hon'ble Commission on the above mentioned Draft Regulations, we hereby submit our comments on the same in the files attached herewith. Request you to kindly take the same on record.

Thanking You

For Adani Power Limited

Authorized Signatory

Encl: As per above

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Comments on Draft CERC (Indian Electricity Grid Code) (Fifty Amendment) Regulations, 2016

S No	Existing/Proposal in Draft		Changes Proposed by APL	Rationale
	Existing Regulation	Proposed Amendment		
1	<p>6.5 (3) - By 8 AM every day, the ISGS shall advise the concerned RLDC, the station-wise ex-power plant MW and MWh capabilities foreseen for the next day, i.e., from 0000 hrs to 2400 hrs of the following day.</p> <p>6.5 (4) - The above information of the foreseen capabilities of the ISGS and the corresponding MW and MWh entitlements of each State, shall be compiled by the RLDC every day for the next day, and advised to all beneficiaries by 10 AM. The SLDCs shall review it vis-à-vis their foreseen load pattern and their own generating capability including bilateral exchanges, if any, and advise the RLDC by 3 PM their drawal schedule for each of the ISGS in which they have Shares, long-term and medium-term bilateral interchanges, approved short term bilateral interchanges</p> <p>6.5 (7) - By 6 PM each day, the RLDC shall convey:</p> <p>(i)The ex-power plant "despatch schedule" to each of the ISGS, in MW for different time block, for the next day. The summation of the ex-power plant drawal schedules advised by all beneficiaries shall constitute the ex-power plant station-wise despatch schedule.</p> <p>(ii)The "net drawal schedule" to each regional entity, in MW for different time</p>	<p>6.5 (3) - By 1 PM every day, the ISGS shall advise the concerned RLDC, the station-wise ex-power plant MW and MWh capabilities foreseen for the day after the next day, i.e., from 0000 hrs to 2400 hrs of the day after the next day</p> <p>6.5 (4) - The above information of the foreseen capabilities of the ISGS and the corresponding MW and MWh entitlements of each State, shall be compiled by the RLDC every day for the day after the next day, and advised to all beneficiaries by 3 PM. The SLDCs shall review it vis-à-vis their foreseen load pattern and their own generating capability including bilateral exchanges, if any, and advise the RLDC by 5 PM their tentative drawal schedule for each of the ISGS in which they have Shares, long-term and medium - term bilateral interchanges, approved short - term bilateral interchanges</p> <p>6.5 (7) - By 7 PM each day, the RLDC shall convey:</p> <p>(i)The ex-power plant "despatch schedule" to each of the ISGS, in MW for different time block, for the day after the next day. The summation of the ex-power plant drawal schedules advised by all the beneficiaries shall constitute the ex-power plant station-wise despatch schedule.</p> <p>(ii) The tentative "net drawal schedule" to each regional entity, in MW for different time block,</p>	<p>In order to achieve higher accuracy without frequent revisions by Beneficiaries, a suitable provision may be carried out to link Incentive with highest schedule in any time block amongst all revisions.</p>	<p>The beneficiaries usually tend to give full schedule against the DC offered by ISGS and thereafter make real time revisions. In order to implement the changes in letter & spirit, it is pertinent that the beneficiaries should give schedules for day after next day after judiciously planning the supply - demand situation in their scope of area.</p>

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	block, for the next day. The summation of the station-wise ex-power plant drawal schedules from all ISGS and drawal from /injection to regional grid consequent to other long term access, medium term and short-term open access transactions, after deducting the transmission losses (estimated), shall constitute the regional entitywise drawal schedule.	for the day after the next day next day. The summation of the station-wise ex-power plant drawal schedules from all ISGS and drawal from /injection to regional grid consequent to other long term access, medium term and short-term open access transactions, after deducting the transmission losses (estimated), shall constitute the regional entity-wise drawal schedule. (iii) ISGS wise un-requisitioned surplus (URS) power to ISGS and SLDCs.		
2	6.5 (8) - The SLDCs/ISGS shall inform any modifications / changes to be made in drawal schedule/foreseen capabilities, if any, to RLDC by 10 PM or preferably earlier.	6.5 (8) (a) Original Beneficiaries of an ISGS will have first right to give requisition for the URS power of the ISGS. Such original beneficiaries shall advise RLDCs, through their SLDC, regarding quantum of power and time duration of such drawal out of declared URS of the ISGS, by 8 P.M. In case full URS of an ISGS is requisitioned by more than one original beneficiary, RLDC shall allocate URS proportionately based on the share of these original beneficiaries in the ISGS. (b) RLDCs to post the ISGS wise data of balance URS on its website by 9 P.M. after modifying the tentative net drawal schedule of the original beneficiaries after taking into account the URS requisitioned and associated transmission losses. (c) ISGS may sell the balance URS power left after completion of the process of requisition by other original beneficiaries of the plant, in	ISGS should be allowed to revise DC of Long Term/Medium Term beneficiaries if there is an eventuality of unit tripping/outage and the URS has been sold under collective transaction as revisions in-case of any unit tripping/outage is not allowed in sale under collective transaction.	Revision in case of collective transactions is not allowed even for tripping/outage of any Unit. Therefore, Once URS has been sold under collective transaction, it is not possible to change it.

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		<p>the market. The original beneficiary shall communicate by 12 PM about the quantum and duration of such URS power to ISGS to enable ISGS sell same in the market. If the original beneficiary fails to communicate to ISGS, then the ISGS shall be entitled to sell the URS power of the beneficiary in the market.</p> <p>(d) The URS which has been sold and scheduled by ISGS in the market (power exchange or through STOA) cannot be called back by the original beneficiary.</p> <p>(e) After sale in market as under 8(d) above, if any power still remains under URS, the same may be requisitioned by the beneficiaries of the station.</p> <p>(f) By 6 P.M, each day, RLDC shall convey ex-power power plant dispatch to each ISGS for the next day after incorporating sale in market</p> <p>(g) Any change in drawal/ foreseen capacities shall be communicated to RLDCs by 10 P.M of the day prior to day of scheduling</p>		
2	No such provision	<p>6.5 (19)</p> <p>.....</p> <p>Provided that if a generator is not able to restore the unit by the estimated time of restoration, RLDC shall revise the schedule only one more time on the basis of new estimated time of restoration and the revision schedule shall become effective from the 4th time block,</p>	Generator should be allowed atleast two revisions after the first revision which is done just after the unit tripping / outage	To predict exact time of restoration just at the time of unit tripping/outage is practically not possible.

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		counting the time block in which the revision is advised by the generator to be the first one.	Also, if the Unit could not be synchronized once it has been lit-up, due to any technical difficulties, the Generator should be allowed to carry out revisions.	The gravity of problem is known only after the problem is being attended and thereafter during testing time.