



No. IEX/BD/1600/16-17

Date: 29th December, 2016

To,

The Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building
36, Janpath
New Delhi - 100 001,
Fax: 011-23753923

Sub: Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Fifth Amendment) Regulations, 2016.

Ref: Public Notice No.L-1/18/2010-CERC dated 09th December, 2016

Sir,

This has reference to Public Notice dated 09.12.2016 inviting suggestions and comments from stake holders on the subject matter. Accordingly, comments on behalf of IEX are attached at Annexure for consideration of the Hon'ble Commission.

Yours Faithfully


Shruti Bhatia

VP (Regulatory Affairs & Communication)

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ANNEXURE***Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Fifth Amendment) Regulations, 2016***

We welcome the step taken by the Hon'ble Commission to further strengthen development of market by proposing amendments to IEGC Regulations. We appreciate that appropriate amendments have been proposed in the scheduling procedures to enable sale of URS Power in the market. In order to bring greater clarity in the proposed amendments we hereby propose following suggestion which may be considered by the Honorable Commission while finalizing the proposed Regulations:

Timeline of URS information to ISGS- Clause 8(c) of Regulation 6.5:

Hon'ble Commission proposed Clause 8(c) of Regulation 6.5 to enable sale of URS Power in the market. To meet the time line of the Tariff Policy i.e ISGS shall have the communication regarding un-requisitioned power from the procurers at least 24 hours before 0.00 hours of the day of delivery, proposed Clause 8(c) provides as follows:

"8(c) ISGS may sell the balance URS power left after completion of the process of requisition by other original beneficiaries of the plant , in 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."

While reading above clause it may be inferred that original beneficiary is required to communicate URS power by 12 PM (12 noon) of one day before the delivery day. However, intent of this clause is to provide URS information to ISGS by at least 24 hours before 0.00 hours of the day of scheduling. Therefore, to avoid any confusion, it may be clearly specified that the original beneficiary shall communicate by 0000 Hrs of previous day of delivery i.e. (D-1) about the quantum and duration of such URS power to ISGS to enable ISGS sale in the market. Accordingly, Clause 8(c) may be modified as follows:

"8(c) ISGS may sell the balance URS power left after completion of the process of requisition by other original beneficiaries of the plant , in the market . The original

beneficiary shall communicate ~~by 12 PM~~ 00.00 Hours of previous day of delivery 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."