



December 30, 2016

To,

Smt Shubha Sarma  
Secretary, Central Electricity Regulatory Commission  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building,  
36 Janpath, New Delhi – 110001

**Sub: JSW Energy's Comments/Suggestions on Draft CERC (Indian Electricity Grid Code) (Fifth Amendment) Regulation, 2016**

Dear Mam,

This has reference to your letter no. L-1/18/2010-CERC dated 9<sup>th</sup> December, 2016 seeking comments and suggestions on Draft CERC (Indian Electricity Grid Code) (Fifth Amendment) Regulation, 2016.

In this context, we would like to draw your attention towards the proposed amendment as stipulated in clause 5.2 (h) (ii):

*"For the purpose of ensuring sustainable primary response, RLDCs/SLDCs shall not schedule the generating units beyond ex-bus generation corresponding to 100% of the installed capacity. Further, Valve Wide Open operation of unit is not allowed so that there is margin available in valve opening for providing primary response up to 5% of the generation level....."*

You would appreciate that most of the Hydro Electric Plants are having Maximum Continuous Rating (MCR) as 110% of Installed Capacity. Therefore, such provision will lead to loss of about 10% of Generation which is nothing but a national loss. Such restriction will have severe impact on the financial viability of hydro projects.

In view of above, Run-of-River and Run of River with Pondage Hydro Electric Plants may be excluded from aforesaid condition during the peak season.

We look forward for your kind consideration.

Thanking you,

Yours Sincerely,  
For JSW Energy Limited,

Abhay Yagnik  
General Manager  
(Business Development)