



## KERALA STATE ELECTRICITY BOARD LIMITED

(Incorporated under the Indian Companies Act, 1956)

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KSEB/TRAC/Comments on draft regulations/2016-17 / 3567

3-1-2017  
10-1-2017

To

**The Secretary,  
Central Electricity Regulatory Commission,  
3<sup>rd</sup> and 4<sup>th</sup> Floor, Chanderlok Building, 36 Janpath Marg,  
New Delhi 110 001.**

Sir,

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

*Ref: Public notice no LL/L812010 - CERC dated 09.12.2016 of Hon'ble CERC.*

Kind attention of Hon'ble Commission is invited to the notification under reference seeking comments on the draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Fifth Amendment) Regulations, 2016. Following comments are offered for kind consideration.

**1. Amendment of regulation 5.2 (f), 5.2(f)(i)(b) and addition of 5.2(f)(i)(c) :**

Regulation 5.2 (f) the proposed amendment to increase the rating of the hydro units for RGMO obligation from 10 MW to 25 MW is welcomed.

However, as mentioned in the explanatory memorandum itself, the age of the units and the present system of governor are also to be considered while implementing FGMO/RGMO. Hence, it is requested that hydro units of 15 years or more age and those which are planned for RMU in the next five years may also be exempted from RGMO obligation. Also, it is requested that in the case of hydro units of age more than 10 years, FGMO with manual intervention may be permitted till the units are taken for renovation.

**2. Amendment of Regulation 5 (f)(ii):**

Hon'ble Commission vide the proposed modification under this clause has restricted the schedule of generating units to exbus generation corresponding to 100% of the installed capacity. Further, it has been proposed that Valve Wide Open (VWO) operation of units shall

not be allowed so that there is margin available in valve opening for providing primary response upto 5% of the generation level.

It is requested that along with the proposed modification under 5.f(ii), following may also be added:

"The generators shall declare their availability faithfully considering the 5% margin RGMO response. In case RLDC / SLDC Suo motu reduces the schedule, the reason for such decision shall be communicated in writing to such generators and also to all stakeholders. The DC shall be revised accordingly and shall be taken for computation of availability by the RPCs/state agencies. Instances of such high declaration made by the generators shall be reviewed in the commercial subcommittee meetings and if the explanation of the generator is not accepted, such cases shall be dealt with as misdeclaration."

This paragraph is proposed as there has been no consensus in the RPC forum regarding this issue and generators are claiming more availability. It is also observed that sometimes the generation schedule is more than the DC of the generator while RRAS is scheduled'. The high declaration made by the generators is getting denied for the eligible beneficiaries and the same is getting scheduled for RRAS'.

### **3. Amendment of Regulation 6.5(A)(d):**

Following modifications may be added with respect to sharing of gains due to sale of URS in market:

" .....This gain shall be calculated as the difference of selling price of such power and the actual variable cost billed to the beneficiaries for the corresponding period. "

Further, as a deterrent to avoid sale at lower prices, the following may also be added

"..if the sale price is less than the actual variable cost or if it is discovered subsequently by the commercial subcommittee of the RPC that the variable cost worked out is manipulated for the period under consideration , the generator shall reimburse the fixed cost of units so sold worked out on the basis of the generation at target plf or actual plf, whichever is lower".

Yours faithfully,

  
Chief Engineer (Commercial & Tariff)  
10/11