



30th Dec 2016

TPTCL/CERC/NS/FY17/317

Secretary,
Central Electricity Regulatory Commission
3rd and 4th Floor Chanderlok Building,
36, Janpath
New Delhi 110001
Tel No.:011-23753915 / Fax No.:011-23753923

Dear Sir,

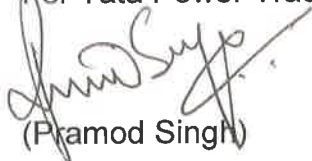
Sub: Comments on Draft CERC (Indian Electricity Grid Code) (Fifth Amendments) Regulations, 2016

Reference public notice No. L-1/18/2010-CERC, dated 9th December 2016 as issued by the Hon'ble Commission, please find enclosed Annexure for our comments on the draft fifth amendments to CERC IEGC Regulations, 2010.

Thanking you,

Yours sincerely,

For Tata Power Trading Company Ltd.



(Pramod Singh)

Head - Long Term Contracts

Tata Power Trading Company Limited

"Shatabdi Bhawan", 2nd Floor, B-12&13, Sector-4, Noida-201301 (U.P.) Tel.: 91 120 610 2000, Fax No. 91 120 254 0050

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Corporate Identification Number (CIN-U40100MH2003PLC143770)



Comments on Draft IEGC (Fifth Amendments) Regulations, 2016

1. Amendment to Regulation 6.5

Comments:

We would like to submit that the amendments proposed to Regulations 6.5 should also be applicable to generating stations other than Central Generating Stations, which have signed Power Purchase Agreements with two or more than two entities, for scheduling power through Long Term Access.

As per draft fifth amendment, the original beneficiary shall communicate by 12 noon about the quantum and duration of such URS power to ISGS to enable ISGS sell same in the market. However, it is suggested that original beneficiary shall communicate by 10 AM, one day ahead, about quantum and duration of URS to ISGS. This would enable ISGS to bid the URS on Exchanges as per existing bidding window between 10 hrs to 12 hrs, in Day Ahead Market.

Further, in case URS power is scheduled under STOA through Collective/Bilateral transaction, it is requested that Hon'ble Commission may provide suitable off set mechanism for POC charges as POC Injection and POC withdrawal charges, for the URS quantum are borne by concerned buyers/DICs, mostly by beneficiary states/DISOCMs.

Since URS power is emanating power from Long Term PPAs which otherwise entitles for scheduling under Long term Access, for which transmission capacity is built. Hence, transmission capacity towards URS power should be suitably allocated to the market for trade of URS in the short term market.

2. Amendment to Regulation 6.5 / sub-clause 8(d)

Comments

As per IEGC Second amendment clause 6.5.18, revision of declared capability by the ISGS(s) and requisition by beneficiary (ies) for the remaining period of the day shall also be permitted with advance notice. Revised schedules/declared capability in such cases shall become effective from the 4th time block.

And draft Fifth amendment sub clause 8(d), provides that 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.

A clarity regarding not allowing of call back of URS in the draft amendment, in respect of existing provision of 6.5.18 may be allowed.

Tata Power Trading Company Limited

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