



WEST BENGAL ELECTRICITY REGULATORY COMMISSION



Ref No: WBERC/A 3/ Website/1/2079

Dated, Kolkata, 10th January, 2017

From:

Dr.Jiban Chandra Chakraborty, I.A.S (Retd)
Secretary, WBERC

To:

The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chandralok Building,
36, Janpath, New Delhi – 110001

Sub: Comments on Draft Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Fifth Amendment) Regulation, 2016

Sir,

In inviting a reference to the above-mentioned subject read with Public Notice issued under No. L -1/18/2010- CERC dated 9th December, 2016, I am directed to state that the Commission has the following comments to make:

- 1) Sub – part ‘e’ of Paragraph ‘4’ regarding Amendment of Part 2 of Principal Regulation –

Draft Amendment proposed by CERC:

Following shall be added as clause 2.7.1 (f) –

“be responsible for the functions as mandated in the detailed procedures under Central Electricity Regulatory Commission (Ancillary Services Operation) Regulations, 2015.”

Suggestion from WBERC:

SLDC has also to follow the State Grid Code and other regulations framed by SERCs and States may have their own Ancillary Services Regulations, so WBERC suggests amendment as follows:

“be responsible for the functions as mandated in the detailed procedures under Central Electricity Regulatory Commission (Ancillary Services Operation) Regulations, 2015 in absence of any Regulation framed by SERCs on Ancillary Services”

- 2) Sub part ‘i’ & ‘ii’ of part ‘f’ of Paragraph ‘5’ regarding Amendment of Part 5 of Principal Regulations–

Draft Amendment proposed by CERC:

Amendment of Regulation 5.2 (h) shall be substituted with sentence –

“All coal/ lignite based thermal generating units of 200 MW and above, Open Cycle Gas Turbine/ Combined Cycle generating stations having gas turbines of capacity more than 50 MW each and all hydro units of 25 MW and above operating at or up to 100% of their Maximum Continuous Rating (MCR) shall have the capability of (and shall not in any way



WEST BENGAL ELECTRICITY REGULATORY COMMISSION



be prevented from) instantaneously picking up to 105%, 105% and 110% of their MCR, respectively, when the frequency falls suddenly."

Following para may be added at the end of clause 5.2 (h) –

"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 (VWO) operation of units is not allowed so that there is margin available in valve opening for providing primary response up to 5% of the generation level. In case of gas/ Liquid fuel based units also, adequate margins while scheduling should be kept by RLDCs/SLDCs in due consideration of prevailing ambient conditions of temperature and pressure viz. a viz. site ambient conditions on which installed capacity of these units have been specified.

Provided that the VWO margin shall not be used by RLDC to schedule in Ancillary Services."

Suggestion from WBERC:

Real Life example with date is needed for further clarification on paragraph proposed to be added at the end of clause 5.2 (h).

- 3) Part 'v' of Sub part 'a' of Paragraph 6 regarding Amendment of Part 6 of Principal Regulations–

Draft Amendment proposed by CERC:

Following para shall be added at the end of clause 19 –

"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, counting the time block, counting the time block in which the revision is advised by the generator to be the first one."

Suggestion from WBERC:

Commercial treatment to be clearly specified in case the generator fails to restore the unit within the revised restoration time.

I am further directed to request you to kindly consider the views / suggestions of the Commission and take further necessary action in the matter. The Commission also looks forward to your response in the above context in due course.

Yours Faithfully,

Secretary