CERC via its notification published on 28th May 2019, has constituted an Expert group to review "Indian Electricity Grid Code and other related issues".

The Scope of work of the group is as follows:-

- a. To review the provisions of Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2010 based on past experience, recent developments in the power system of India, changes in market structure and future challenges which include high level of renewable penetration in the grid, introduction of new products in the market etc.
- b. Suggest appropriate regulatory intervention and prepare draft IEGC making recommendation for proposed amendment or changes in existing Grid Code.

Further, CERC has also invited comments from all stake holders for any modifications/changes to be made in the existing IEGC in light of large scale integration of renewable and changing power scenario in the country.

The Comments of BRPL on the same is as below:

- Integrated scheduling software need to be made available wherein communication (revision of schedules) between RLDC, SLDC, Generators and Discoms etc becomes seamless. This is in the current scenario need of hour and is expected to provide a major benefit in case of any contingency scenario especially in case of outage of any major generating station.
- Further, time for processing of Intraday contingency applications, which is presently
 of 3 hrs and for all practical reasons is not less than 04 hrs, need to be minimised to
 04 time slots by way of integrated consent management software.
- 3. Presently, it can be seen that all RLDCs publishes approx 150 200 revisions in a day. Tracking these many revisions may not be feasible by any Discom.
- 4. With DSM 5th Amendment in place, any change in actual generation by a renewable energy plant, without an automated intimation platform wherein any change in

- schedule by RE generator is known to Discoms, may lead to sustained violation penalties.
- 5. 01 revision for next Day for all ISGS being available on respective RLDC's website doesnot take into consideration the tripping status of the plant, if any and generally depicts the full DC of the plant for the next day. This need to be updated based on the present running condition and outages so that proper planning for the next day can be done by Doscoms.
- 6. Power systems, especially those with a high share of RE, require access to sufficient flexible resources (e.g., demand response, gas turbines, hydroelectricity, etc.) to ensure continued stability of the grid at each moment. Currently, there are no mechanisms in India to ascertain the amount of balancing resources needed and how these can be procured and dispatched.
- Schedule of Short term, medium term and long term Open Access consumers should be made available to the respective SEBs/ DISCOMs well in advance for optimisation of power purchase.
- 8. Integration of high amount of renewable energy will also require instantly available balancing power. Battery Energy Storage Systems (BESS) can provide an major advantage over the other sources of balancing power such as pump storage hydro plants. The BESS installed within the distribution network will reduce the transmission losses and hence save costs. The availability of power at the load centric will also help in reducing loading of network and provide relief in over loaded areas. BESS with the advancements in technologies is expected to available round the clock, throughout the year at low cost and hence be cost effective.