



JINDAL INDIA THERMAL POWER LIMITED

REGD. OFF: Habitat India, C-3, Qutab Institutional Area,

Katwaria Sarai, New Delhi- 110016, PHONE: 011-40841950

WEBSITE : www.jitpl.com, CIN: U74999DL2001PLC109103

Letter No: JITPL/CERC/IEGC/FY2022-23/208

Date: 19.10.2022

To,
Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building, 36, Janpath, New Delhi-110001

Sub: Submission of Queries/Comments/Suggestion on Draft IEGC Regulation. Reg

Ref: No. L-1/265/2022/CERC dt:07.06.2022.

Dear Sir,

This is in reference to subject cited above, wherein Central Electricity Regulatory Commission (CERC) has issued draft regulation on Indian Electricity Grid Code (IEGC). We, Jindal India Thermal Power Limited (JITPL) has 1200 (2x600) MW, fully commissioned, Thermal Power Station at Derang, in Angul district of Odisha would like to submit our queries/comment on the subjected draft.

In view of above, we request CERC to issue clarification/amend certain clauses. The clarifications required are enclosed herewith as **Annexure-I (10 pages)**.

We shall be obliged to obtain written clarification from CERC.

Thanking you and assuring you of our best services.

Yours Sincerely,


For **Jindal India Thermal Power Limited.**


Piyush Rai
Deputy - Manager -

Authorised Signatory


Queries/Comment on Draft CERC IEGC Regulation 2022.

Sl. No.	Clause No. and Existing Provision	Queries/ Clarification Required	Suggested text for the amendment	Rationale for clarification/ amendment
1	Cl. 45. 1 (a): RLDCs shall publish list of all regional entity generating stations within their control area, which shall be updated quarterly on its website along with details such as station capacity, allocated share of beneficiaries, contracted quantum by buyers and balance available capacity.	Generators tie up their power in various modes like STOA bilateral or LDC contract on Power Exchange for shorter period like daily, weekly, fortnightly or monthly. How RLDCs will capture all the contracted quantum and balance available capacity with any Generating station.	Cl. 45. 1 (a): RLDCs shall publish list of all regional entity generating stations within their control area, which shall be updated quarterly on its website along with details such as station capacity, allocated GNA share of beneficiaries, T-GNA contracted quantum by buyers and balance available capacity.	It will be difficult for RLDC to maintain 100% correct contracted capacity and balance capacity of every single Generating stations. Further, quarterly data may not be authentic till next quarter. So, such clause may be amended suitably.
2	Cl. 45 (5) (a) (iv): Copies of the valid contracts by the sellers and the buyers, for transactions other than collective transactions.	Contracts are the unique part of sellers and buyers and LTA/MTOA contracts copies is being already used to submit in RLDC. But for T-GNA contracts generators and buyers regularly enter in new contracts so it will be difficult to share such copies. Kindly clarify the need to copy of contract.	Cl. 45 (5) (a) (iv): Copies of the valid contracts <i>for long / medium term power sale</i> by the sellers and the buyers, for transactions other than collective transactions.	There is no requirement of copies of T-GNA contract. Since the contract is between parties. RLDC concern is to check the scheduling and despatch not the terms of contract. Further, as per Cl. 45 (5) (a) (iii) Generators are asked to submit the declaration of existing valid contracts which is self sufficient for RLDC. Hence it is requested Such clause shall be amended / deleted.
3	Cl. 45. (8) (b): The regional entity generating stations may be required to demonstrate the declared capacity of their generating	DC declaring is a part of contract between the Sellers and Buyers, there is no requirement to demonstrate DC to RLDC every year. Every	Cl. 45. (8) (b): The regional entity the declared capacity <i>whose at least 85% power tied up under Long / Medium term contracts.</i>	Demonstrating DC to RLDC is not a part of PPA and will surpass the exclusivity of PPA. So, the clause may be amended / deleted. Also, it is not necessary for power plants which have power tied up below 85% of Installed capacity.



 Prakash Rai
 Deputy - Manager

Sl. No.	Clause No. and Existing Provision	Queries/ Clarification Required	Suggested text for the amendment	Rationale for clarification/ amendment
	stations as and when directed by the concerned RLDC. For this purpose, RLDC, in coordination with SLDC and the beneficiaries, shall schedule the regional entity generating station upto its declared capacity as declared on day ahead basis at time of first declaration. RLDC shall ask each generating station, at least once in a year, to demonstrate the declared capacity.	contract has their exclusivity and demonstrating DC in each Contract to RLDC will unnecessarily build confusion & duplicity of work.		
4	<p>Cl. 45. (8) (c): The schedule issued by the RLDC shall be binding on the beneficiaries for such testing of declared capacity of the regional entity generating station. In case the generating station fails to demonstrate the declared capacity, it shall be treated as mis-declaration for which charges shall be levied on the generating station by RPC as follows: The charges for the first mis-declaration for a block or multiple blocks in a day shall be the charges corresponding to</p>	The clause is superseding the individuality of PPA's.	<p>Cl. 45. (8) (c): The schedule issued by the RLDC shall be binding on the beneficiaries for such testing of declared capacity of the regional entity generating station <i>whose at least 85% power tied up under Long / Medium term contracts</i>. In case the generating period of a month.</p>  Piyush Rai Deputy - Manager -	The Sellers and Buyers enter into the PPA which is in line with Ministry of Power Guidelines and such clause will demolish the stake of such guidelines. So, the clause may be amended / deleted.


Sl. No.	Clause No. and Existing Provision	Queries/ Clarification Required	Suggested text for the amendment	Rationale for clarification/ amendment
	two days fixed charges at normative availability. For the second mis-declaration, the charges shall be corresponding to four days fixed charges at normative availability and for subsequent misdeclarations, the charges shall increase in a geometric progression over a period of a month.			
	45 (9) Ramping Rate to be Declared for Scheduling: (i) Coal or lignite fired plants shall declare a ramp up or ramp down rate of not less than 1% of ex-bus capacity corresponding to MCR on bar per minute;	Ramp up or ramp down depends on O&M manuals. It varies with Plant to Plant.	45 (9) Ramping Rate to be Declared for Scheduling: (i) Coal or lignite fired plants shall declare a ramp up or ramp down rate <i>as per their O&M manuals</i> of ex-bus capacity corresponding to MCR on bar per minute;	Ramp up or ramp down depends on O&M manuals provided by equipment suppliers and any Unit need to operate as per O&M manuals for safe and reliable plant operation.
5	Cl. 45. (12): Minimum turndown level for thermal generating stations The minimum turndown level for operation in respect of a unit of a regional entity thermal generating station shall be 55% of MCR of the said unit: Provided that the Commission may fix through an order a different minimum		Cl. 45. (12): Minimum turndown level for thermal generating stations The minimum turndown level for operation in respect of a unit of a regional entity thermal generating station shall be 55% of MCR at Ex-bus of the said unit. Provided that the Commission may fix through an order a different minimum	Minimum plant operation load depends on various O&M manuals of different suppliers for safe and reliable plant operation.



 Piyush Rai
 Deputy - Manager -

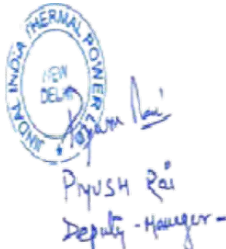
Sl. No.	Clause No. and Existing Provision	Queries/ Clarification Required	Suggested text for the amendment	Rationale for clarification/ amendment
	<p>turndown level of operation in respect of specific unit(s) of a regional entity thermal generating station: Provided further that such generating station on its own option may declare a minimum turndown level below 55% of MCR:. Provided also that the regional entity thermal generating stations shall be compensated for generation below the normative level either as per the mechanism in the Tariff Regulations or in terms of the contract entered into by such generating station with the beneficiaries or buyers, as the case may be.</p>		<p>turndown level of operation in respect of specific unit(s) of a regional entity thermal generating station in consultation with any Generating Station as per their O&M manuals for plant operations.</p>	
6	<p>Cl. 47 (j): Scheduling of collective transactions: (i) Power Exchange(s) shall open bidding window for day ahead collective transactions from 10 AM to 11.30 AM of 'D-1' day.</p>	<p>Scheduling of collective transaction is time consuming, before that Sellers and buyers had to do several activities, so reducing time for open bidding window will impact the bidding process and bring false demand.</p>	<p>Cl. 47 (j): Scheduling of collective transactions: (i) Power Exchange(s) shall open bidding window for day ahead collective transactions from 10 AM to 11.30 AM 12:00 PM of 'D-1' day.</p>	<p>Reducing the time for bidding window for day ahead power transaction on Power Exchange will impact Seller as well as buyer. There are several activities has to be done before the bidding of DAM transaction on Power Exchange like planning of generation, tie-up of Day ahead bilateral transaction (if any), market analysis, tariff analysis, coal stocks etc. from generator end and from buyer end forecasting of demands, weather forecast and etc. and all these activities are time consuming. So,</p>



Prakash Rai
Deputy - Manager -

Sl. No.	Clause No. and Existing Provision	Queries/ Clarification Required	Suggested text for the amendment	Rationale for clarification/ amendment
				kindly amend the clause suitably and accordingly the sub-clauses shall be amended, if required.
7	<p>Cl. 47. (7): In case of forced outage of a unit of a generating station (having generating capacity of 100 MW or more) and selling power under bilateral transaction (excluding collective transactions in day ahead market and real time market through power exchange), the generating station or electricity trader or any other agency selling power from the unit of the generating station shall immediately intimate the outage of the unit along with the requisition for revision of schedule and estimated time of restoration of the unit, to SLDC or RLDC, as the case may be.</p> <p>The schedule of beneficiaries, sellers and buyers of power from this generating unit shall be revised accordingly. The revised schedules shall become effective from the time block and in the manner as specified</p>	There is no clarity of on what basis revision of schedule shall be done. Please clarify.	<p>Cl. 47. (7): In case of forced outage of a unit of a generating station (having generating capacity of 100 MW or more) and selling power under bilateral transaction (excluding collective transactions in day ahead market and real time market through power exchange), the generating station or electricity trader or any other agency selling power from the unit of the generating station shall immediately intimate the outage of the unit along with the requisition for revision of schedule and estimated time of restoration of the unit, to SLDC or RLDC, as the case may be.</p> <p>The schedule of beneficiaries, sellers and buyers of power from this / other generating unit(s) shall be revised accordingly on pro rata basis as intimated by generating station. The revised schedules shall become effective from the time block and in the manner as specified in Clause (4) of this Regulation:</p>	Mechanism for revision of schedule in case of Forced outage is not mentioned in the draft which may arise dispute between the parties. So, the clause may be suitably amended.


 Piyush Rai
 Deputy - Manager -

Sl. No.	Clause No. and Existing Provision	Queries/ Clarification Required	Suggested text for the amendment	Rationale for clarification/ amendment
	<p>in Clause (4) of this Regulation:</p> <p>Provided that the generating station or trading licensee or any other agency selling power from a generating station or unit(s) thereof may revise its estimated restoration time once in a day and the revised schedule shall become effective from the 7th time block or 8th time block as per Clause (4) of this Regulation, counting the time block in which the revision is informed by the generator to be the first one.</p>		<p>Provided that the generating station or trading licensee or any other agency selling power from a generating station or unit(s) thereof may revise its schedule after considering its day ahead Open Access Applications / schedules once in a day and estimated restoration time once in a day and the revised schedule shall become effective from the 7th time block or 8th time block as per Clause (4) of this Regulation, counting the time block in which the revision is informed by the generator to be the first one.</p>	
8	<p>Cl. 47. (7): New clause</p> <p>Revision of schedule on account of unit tripping</p>	<p>With reference existing IEGC Regulation Cl.6.5.28, the suppliers are bound to do pro-rata in each PPA in case of Forced Outage, i.e. pro-rata is to be done on the date of unit tripping not during the extended period of unit tripping till the time of restoration. But there are several instances where RLDC's has asked Generators to do pro-rata</p>	<p>In case of Forced Outage of a unit, the generator shall revise the declare capacity of the station in RLDC WBES on pro-rata basis for the days for which the DC in PPA's R-0 is implemented.</p>  <p>Piyush Rai Deputy - Manager -</p>	<p>Every PPA's has different terms & conditions and unique in nature. Also, the scheduling procedure of every PPA is different and some PPA is being scheduled on day ahead basis. But the existing IEGC Regulation Cl.6.5.28 is restricting power scheduling in PPA with Day Ahead STOA. A Illustration is given below for better understanding.</p> <p>For Example: Assumption-</p> <p>a. Generating Capacity =1000 MW (500 MW each in 2 units)</p>

Sl. No.	Clause No. and Existing Provision	Queries/ Clarification Required	Suggested text for the amendment	Rationale for clarification/ amendment																																																				
		during the extended period of unit tripping and distribute quantum equally in each PPA, if in any PPA the quantum is 1-2 MW is more or less. Since, Declaring Capacity/availability in PPA's are right of Generators and any DC can be declared in PPA as per the availability with Generator during the extended period of Unit Tripping.	<div></div>	<p>b. Say there are six PPAs naming P1, P2, P3, P4, P5 and P6 under LTA/MTOA/STOA. A entitlement of all PPA in generating station is shown below in Table-1.</p> <p>Table 1: Entitlement of PPA in generating Station-</p> <table><tr><th>PPA</th><th>Contracted Capacity (MW)</th><th>%ge</th><th>Mode of Scheduling</th></tr><tr><td>P1</td><td>200</td><td>20%</td><td>LTA</td></tr><tr><td>P2</td><td>80</td><td>8%</td><td>LTA</td></tr><tr><td>P3</td><td>150</td><td>15%</td><td>STOA (FCFS)</td></tr><tr><td>P4</td><td>200</td><td>20%</td><td>MTOA</td></tr><tr><td>P5</td><td>100</td><td>10%</td><td>STOA (FCFS)</td></tr><tr><td>P6</td><td>150</td><td>15%</td><td>STOA (DA)</td></tr></table> <p>Now power is scheduled for power generating station under all the aforesaid PPA and balance is sold in power exchange market. A typical schedule for say Jan'2022 is shown in Table-2.</p> <p>Table: 2 Scheduling of 1000 MW power under various PPA's and on Power Exchange:</p> <table><tr><th>PPA</th><th>Approved Quantum (MW)</th><th>% Scheduling</th><th>Mode of Scheduling</th></tr><tr><td>P1</td><td>200</td><td>100%</td><td>LTA</td></tr><tr><td>P2</td><td>80</td><td>100%</td><td>LTA</td></tr><tr><td>P3</td><td>150</td><td>100%</td><td>STOA (FCFS)</td></tr><tr><td>P4</td><td>200</td><td>100%</td><td>MTOA</td></tr><tr><td>P5</td><td>100</td><td>100%</td><td>STOA (FCFS)</td></tr></table>	PPA	Contracted Capacity (MW)	%ge	Mode of Scheduling	P1	200	20%	LTA	P2	80	8%	LTA	P3	150	15%	STOA (FCFS)	P4	200	20%	MTOA	P5	100	10%	STOA (FCFS)	P6	150	15%	STOA (DA)	PPA	Approved Quantum (MW)	% Scheduling	Mode of Scheduling	P1	200	100%	LTA	P2	80	100%	LTA	P3	150	100%	STOA (FCFS)	P4	200	100%	MTOA	P5	100	100%	STOA (FCFS)
PPA	Contracted Capacity (MW)	%ge	Mode of Scheduling																																																					
P1	200	20%	LTA																																																					
P2	80	8%	LTA																																																					
P3	150	15%	STOA (FCFS)																																																					
P4	200	20%	MTOA																																																					
P5	100	10%	STOA (FCFS)																																																					
P6	150	15%	STOA (DA)																																																					
PPA	Approved Quantum (MW)	% Scheduling	Mode of Scheduling																																																					
P1	200	100%	LTA																																																					
P2	80	100%	LTA																																																					
P3	150	100%	STOA (FCFS)																																																					
P4	200	100%	MTOA																																																					
P5	100	100%	STOA (FCFS)																																																					


 Piyush Rai
 Deputy - Manager -

Sl. No.	Clause No. and Existing Provision	Queries/ Clarification Required	Suggested text for the amendment	Rationale for clarification/ amendment			
				P6	150	100%	STOA (DA)
				IEX	120	-	DAM
				Total	1000		
				If at 18:00 hrs of 01.01.2022 Unit-1 gone under Forced Outage and Unit-2 DC is 500, then as per IEGC regulation 6.5.19 we have to do pro-rata in all PPA's mentioned above in table (illustration given in below table) Table: 2 Revision of Schedule on Pro-rata basis for one unit operational i.e. 500 MW power under various PPA's and on Power Exchange:			
				PPA	Revised Quantum (MW) after pro-rata	Mode of Scheduling	
				P1	86.36	LTA	
				P2	34.55	LTA	
				P3	64.77	STOA (FCFS)	
				P4	86.36	MTOA	
				P5	43.18	STOA (FCFS)	
				P6	64.77	STOA (DA)	
				IEX	120.00	DAM	
				Total	500		
				The above pro-rata will be done for dated 01.01.2022 and 02.01.2022 as the scheduling for 01 st and 02 nd is already done. The scheduling for 03.01.2022 will be as per table below in accordance with present operating procedure-			



Prakash Rai
Deputy - Manager -

Sl. No.	Clause No. and Existing Provision	Queries/ Clarification Required	Suggested text for the amendment	Rationale for clarification/ amendment																																
				<p>Table:3 Scheduling of Power under various PPA's on pro-rata basis under one unit operational for 03.01.2022:</p> <table><tr><th>PPA</th><th>DC and revised approved Quantum (MW) after pro-rata</th><th>% Scheduling after pro-rata</th><th>Mode of Scheduling</th></tr><tr><td>P1</td><td>136.99</td><td>68%</td><td>LTA</td></tr><tr><td>P2</td><td>54.79</td><td>68%</td><td>LTA</td></tr><tr><td>P3</td><td>102.74</td><td>68%</td><td>STOA (FCFS)</td></tr><tr><td>P4</td><td>136.99</td><td>68%</td><td>MTOA</td></tr><tr><td>P5</td><td>68.49</td><td>68%</td><td>STOA (FCFS)</td></tr><tr><td>P6</td><td>0</td><td>0%</td><td>STOA (DA)</td></tr><tr><td>Total</td><td></td><td>500</td><td></td></tr></table> <p>Here, scheduling of P6 is not allowed as the scheduling in the said PPA is on STOA Day Ahead basis and the share of the P6 PPA is allocated in P1 to P5 which is not correct. There are several instances happened that RLDC's has raised issue for scheduling of power on day ahead as new application which restrict the scheduling under P6 which is the obligation of Generator as per the PPA terms and Generators has to comply the same by scheduling power under P6.</p> <p>Suggested change under the existing operating procedure;</p>	PPA	DC and revised approved Quantum (MW) after pro-rata	% Scheduling after pro-rata	Mode of Scheduling	P1	136.99	68%	LTA	P2	54.79	68%	LTA	P3	102.74	68%	STOA (FCFS)	P4	136.99	68%	MTOA	P5	68.49	68%	STOA (FCFS)	P6	0	0%	STOA (DA)	Total		500	
PPA	DC and revised approved Quantum (MW) after pro-rata	% Scheduling after pro-rata	Mode of Scheduling																																	
P1	136.99	68%	LTA																																	
P2	54.79	68%	LTA																																	
P3	102.74	68%	STOA (FCFS)																																	
P4	136.99	68%	MTOA																																	
P5	68.49	68%	STOA (FCFS)																																	
P6	0	0%	STOA (DA)																																	
Total		500																																		



Piyush Rai
Deputy - Manager -

Sl. No.	Clause No. and Existing Provision	Queries/ Clarification Required	Suggested text for the amendment	Rationale for clarification/ amendment			
				Since in LTA and MTOA scheduling the DC and curtailment shall be done on pro-rata but there are various PPA’s under LTA/MTOA/STOA whose terms and conditions for scheduling are on STOA(DA basis) basis and after the unit outage Generators has to comply the terms of PPA and provide DC as well as schedule their share on pro-rata basis from the plant ex-bus generation for that particular day.			
				Table:4 Scheduling of Power under various PPA’s on pro-rata basis under one unit operational for 03.01.2022:			
				PPA	DC and revised approved Quantum (MW) after pro-rata	% Scheduling after pro-rata	Mode of Scheduling
				P1	100	50%	LTA
				P2	40	50%	LTA
				P3	75	50%	STOA (FCFS)
				P4	100	50%	MTOA
				P5	50	50%	STOA (FCFS)
				P6	75	50%	STOA (DA)
				Total		440	



Piyush Rai
Deputy - Manager -