


**PUNJAB STATE POWER CORPORATION LIMITED**

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OFFICE OF CHIEF ENGINEER/ PP&amp;R,

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Corporate Identification Number (CIN): U40109PB2010SGC033813 Registration Number: 33813

To

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Memo no 1505

Dated :- 29/9/22

Sub: - Comments/suggestions on Draft Central Electricity Regulatory  
 Commission (Indian Electricity Grid Code) Regulations, 2022

The comments of PSPCL on subject cited draft are as following :-

Chapter-1, Regulation (2), Clause (3):-

" BBMB is a statutory body constituted under the Punjab Reorganisation Act and its functioning is being controlled by the above said Act. In view of these provision BBMB as an organization is just managing the assets of all **the partner states** and associated water conductor system for administration, operation and maintenance of Bhakra & Beas projects irrigation requirement (in turn Power generation form projects) of all the partner states, but affecting most part of the Punjab. Most of within state hydro generation like Anandpur sahib, Mukerian Hydel Project are run off river projects, located downstream to Bhakra and Pong Dam regulated by BBMB.

Similarly Ranjit Sagar Dam water discharge (in turn power generation) is decided in coordination with water discharge from Pong DAM.

All above factors are considered and reviewed by coordination committee of partner states in its monthly meeting with BBMB

Any decision to change the existing regulation in respect to BBMB shall affect Punjab, being a partner state of BBMB.

Therefore it is requested that the generating stations of the Bhakra Beas Management Board (BBMB) shall be continued to be treated as intra-State generating stations. This is because of the fact that the States of Northern Region have Share in BBMB, and their generating units have to be scheduled and despatched in a very special manner (in coordination with the irrigational requirements). The scheduling and despatch of the BBMB generation shall continue to be the responsibility of the BBMB, in coordination with partner states and Northern Regional Load Despatch Centre. Therefore it is requested **to continue with the existing provisions ( 1.3 ii, 6.3) of IEGC-2010** in IEGC-2022 with regard to BBMB

#### **Chapter-1, Regulation (3), Clause (1):-**

On similar lines of DVC , definition of BBMB ( Bhakhra Beas Management Board ) needs to be incorporated , because both has been constituted by Act of parliament as under :-

Sr. no.	BBMB	BBMB means the Bhakra Beas Management Board established under Section 79 of Punjab reorganisation Act, 1966
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#### **Chapter-2, Regulation (5), Clause (3) Sub Clause (f)**

Predominantly being a agriculture state Power Demand in Punjab is highly weather sensitive and volatile. Though arrangements are being and will be made accordingly but to save on the payment of noncompliance charge for failure to meet the generation resource adequacy target approved by the SERC discoms may have to keep additional capacity in its portfolio. This additional capacity may also increase the power procurement cost of Discom.

So keeping the other framework for sufficient resource adequacy in place, **penalty provision of discoms may be exempted please.**

#### **Chapter-7, Regulation (30),**



While fixing the frequency band it may please be considered that new Ancillary service and DSM mechanisms are yet to operationlise. Their impact on the system operation and impact on cost of power procurement by Discoms due to reserves may please be analysed first.

**Chapter-7, Regulation (47), Clause (1) Sub Clause n(v)**

NLDC/RLDC shall announce/prepare the final schedule by **23.30 hrs** of D-1 day as otherwise Discoms will left with no time to manage their drawl as per final schedule /power availability.

**Chapter-7, Regulation (46), Clause (4) Sub Clause (b)**

**Time line to revise requisition form the stations** whose units are likely to be scheduled below minimum turndown level for some or all time blocks of the D day, shall be permitted till at least **1730 Hrs** of D-1 day instead of 1630 hrs, in order to provide sufficient time to discoms for assessment of availability from all its sources and tab on weather dependent demand little more closer to the actual start of day i.e 'D' . Because importantly the revised requisition from the said generating stations, once confirmed by the beneficiaries, shall be final and binding further reduction in drawal schedule shall not be allowed from such stations for such time blocks Discoms/beneficiaries .

Rather in case of sudden/extreme load reduction in a SLDC control area , reduction in schedule from such stations shall also be allowed, otherwise discom will have to must sell such power in RTM irrespective of the cost.

  
Dy. CE/PR  
PSPCL, Patiala

CC: 1. Sr.PS to Director/G for kind information please.  
2. EIC/PP&R, PSPCL, Patiala