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**No. HOD (PMG)/BRPL/457**

**Dated: 11.11.2024**

The Secretary,  
Central Electricity Regulatory Commission  
7th Floor, Tower B, World Trade Centre,  
Nauroji Nagar, New Delhi-110029

**Subject:** Comments/Suggestions on CERC draft order dated 04.10.2024 directions by the Commission to the Power Exchanges -

Dear Sir,

We write in reference to the "**draft order dated 04.10.2024 directions by the Commission to the Power Exchanges**" issued by Hon'ble commission vide notice no. No. L-1/257/2020/CERC dated 04-10-2024 inviting stakeholder comments. In this regards, BSES Rajdhani Power Limited (BRPL) would like to submit its comments/suggestions attached as **Annexure-A**

Thanking you,  
Yours Sincerely,

For BSES Rajdhani Power Limited



Sanjay Srivastav  
Head-PMG

**Annexure -A:** Comments on CERC draft order dated 04.10.2024 regarding directions to power exchanges:

**1- Draft order reference clause number: - 24(a)**

Standardization of contracts by power exchanges as per the NLDC declared RTC/peak/off peak/Evening/Night Hour (All Power Exchanges shall allow only the established pre-specified slots on the exchange platform for TAM contracts (including HP-TAM)).

**BRPL's Suggestion:**

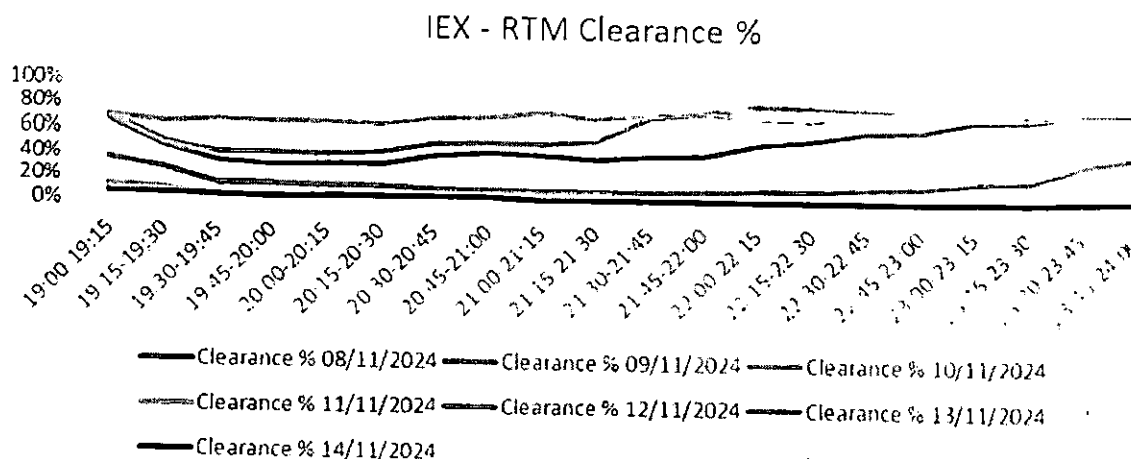
- a. **NLDC Peak slot vs Discom Peak :-** Daily Discom's load profile varies widely because of change in consumer behaviour and weather conditions. For example, in case of Delhi itself BRPL has different peak in night hour during summer where as BYPL & TPDDL have peak during day hours.
- b. **In case of, tripping of major plants:-** Further different portfolio-mix of thermal, hydro, solar, wind result in daily variations in power supply. Real time basis force majeure events also result in reduction in availability from long term plants. Therefore, any standardization of contracts (peak/off-peak/RTC) by exchange may result in surplus in the hand of DISCOM, which will burden the end consumers. So, in the interest of consumers at large existing methodology should continue.

**2- Draft order reference clause number: - 24 (c)**

**Proposal of withdrawal of Intra-Day Contracts in all the Power Exchanges.**

**BRPL's Suggestions:**

Often it is observed that due to scarcity of power availability during peak hours, the average clearance in RTM market is 4% (table depicting RTM clearance for few days).



Source: IEX Website

Whenever in real time basis there is any unforeseen circumstances or force majeure events or DC revision in plants and less clearance in DAM power markets, especially during peak hours, DISCOM's have to arrange power in advance so as to ensure 100% supply. Availability of Intra Day Contracts gives flexible option to DISCOM's in arranging/supplying power for the consumers during such events. Though volume of such transactions is traded less, but such types of markets give option to flexibility and confidence to DISCOM's for real time operations and grid management.

**3- Draft order reference clause number: - 24 (d)**

**Proposal for modification of price discovery mechanism in the case of Contingency Contracts to Uniform Price Step Auction from the existing Continuous matching.**

**BRPL's Suggestions:**

Under the current price discovery mechanism of continuous matching, there is a transparency of price by the seller so that buyer can make informed decision of buying the particular power.

In case of Uniform price step auction model, the behaviour of buyers will be biased towards getting the quantum irrespective of rates in current situation of high peak shortages & illiquid market. All discoms will try to outbid others hence based on the perceived risk of getting the quantum overall price will be jacked up thereby distorting the market as a whole. In view of above our suggestion is to kindly consider the continuous matching model and for better transparency of prices commission may direct exchanges to further improve on transparency & strict compliances ..

**4- Trial run as pilot before implementation of any new mechanism and analysis of results to arrive at any conclusion :**

**BRPL's Suggestions:**

It is suggested that the Honourable Commission before launching any new mechanism may consider at least 3-4 months for reviewing and observe the price/volume trend.

It is suggested that any new mechanism or changes/modification should facilitate optimum purchase quantum and price without creating any surplus/shortage on the DISCOM side to avoid burdening of consumer.

Accordingly, BRPL request the Honourable Commission to consider our above points before making any changes in the existing mechanism.