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<b>Ref. No: GUVNL/Comm./PT/ 1689</b>		<b>Date: 11/11/2024</b>

To,  
 ✓ The Secretary,  
 Central Electricity Regulatory Commission,  
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**SUB: Suggestions from GUVNL pertain to notice regarding CERC draft order in the Suo-Motu Petition No. 8/SM/2024 thereof.**

This is pertain to the public notice of CERC draft order in the Suo-Motu Petition No. 8/SM/2024 on 04th October'24 requesting comments, suggestions, and objections from the stakeholders, including power exchanges and interested persons.

GUVNL is putting forward its suggestions in relation to the proposal for consideration in paragraphs 24-25 based on the CERC draft order as below:

- (1) In clause no 24(a), it is stated that "Power Exchanges shall allow only the established pre-specified slots on the exchange platform for TAM contracts (including HP-TAM)".

**Suggestion: Considering erratic demand and infirm nature of Renewable Energy, the utilities across the nation must have liberty to opine the time period of the slots, instead of established power exchange contract time period, offered in Term Ahead Market (TAM) not only to enable them operational flexibility, but also makes them commercial viable.**

- (2) In clause no 24(b), it is stated that the Acceptance window for buys to accept the contract is maximum 02 (Two) Days.

**Suggestion: As the contract's complexity and financial implications for utilities may eventually influence costs to the residents of the state, it takes considerable amount of time for any utility to get approval from their Competent Authority.**

**Therefore, it is requested to keep the acceptance window time period of 7 working days after e-RA result, instead of 02 days for ADSS contracts.**

- (3) In addition to the suggestions, GUVNL is willing to incorporate one more suggestion in para 7 of "matching mechanisms and bidding timelines in various types of contracts on the Power Exchanges and table 1" of draft order that presently, the bidding time period of the Day Ahead Market is between 10:00 and 11:00 in all power exchanges, however, it is suggested to shift bidding time between 15:00 and 16:00 as to enable utilities to efficiently bid for the next day.

- a. It provides more clarity for Day Ahead Planning to utilities for more accurate Day Ahead demand forecast, conventional generation along with RE availability.

- b. The weather prediction would be more accurate for next day, if forecasting is done in the afternoon for Day Ahead Purchase.
- c. Gujarat, being Super RE Rich state, the impact of the Weather changes is significantly substantial on Demand and RE Power Generation.
- d. It renders more accurate and real time scenario of the power system after due diligence of the demand patterns.

**So, it is our humble request to shift bidding time between 15:00-16:00 Hrs for Day Ahead Purchase.**

GUVNL is requesting to consider the suggestions in the Suo-Motu draft order to enable utilities to operate seamlessly.

Thanking You,



CFM Power  
Trading,  
GUVNL, Gujarat