

Comments/Suggestions

1. The document is silent on how the banking provisions will continue post adoption of MBED. Haryana State is power surplus during the winter months whereas it is deficit in the summer months. Accordingly Haryana State enters into banking arrangements with certain other States who have complimentary demand pattern so as to mitigate its power shortage. The document is silent in this respect and this issue needs to be clearly spelled out and present scenario/flexibility should be allowed to continue.
2. In no way, the adoption of MBED effect the power purchase cost of the Discoms and the benefit of rationalization/optimize scheduling of generators, should benefit the Discoms by lowering their power purchase cost.
3. Post adoption of MBED, the Discoms would be required to pay for the power bid in the pool on day ahead basis i.e. upfront whereas presently it is only required after a period of 30-40 days and any change would create heavy financial burden on the Discoms and may limit their power purchase capability and cause liquidity crisis.
4. Hydro powers are utilized to meet the morning and evening peak demand and are scheduled accordingly to maximize their generation during the peak load hours declared by NRLDC from time to time. This arrangement should continue post adoption of MBED irrespective of the position of these powers in the Merit Order Dispatch.
5. Coal stock of generators should be made adequate otherwise the power purchase cost would increase.
6. Curtailment of power to regions owing to outage of transmission elements especially during peak load season should not have financial implication on the Discoms.
7. In case of sudden load crash, scenario face during the period April to June, the rescheduling period (presently of four time slots) should be reduced in such circumstances as the Discoms will forfeit their right to box up State Gencos which takes significantly lesser time. The DSM calls for severe penalty /levy of charges for excessive deviation and therefore the interests of the Discoms should be safeguarded.
8. Post implementation of MBED, the compensation allowed to Gencos for partial loading will continue or cease to exist.
9. Presently the onus of paying the fixed cost of quantum of power scheduled by any other beneficiary of URS power, is on the beneficiary who avails this URS power. Post adoption of MBED, this benefit to the Discoms should not be taken away.
10. The participation of State Gencos in this arrangement is required to be studied/detailed further as this may create several hindrances. (MTP/Ramp rate/contract arrangement)
11. CERC is requested to arrange more workshops detailing the procedure to be adopted for day ahead bidding processes by the Discoms as the concept of MBED is new, as only after gaining further insight, the Discoms will be in a position to raise queries.
