



सत्यमेव जयते  
भारत सरकार

GOVERNMENT OF INDIA  
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Ref.: BARC/NRB/2019/OPA 79987.

April 26, 2019

To,

The Secretary,  
Central Electricity Regulatory Commission (CERC),  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building,  
36, Janpath, New Delhi - 110001.

Kind Attn.: Shri Sanoj Kumar Jha

**Subject:** Comments on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) (Fifth Amendment) Regulations, 2019.

- Ref.:** 1) Letter No. BARC/NRB/2019/OPA-33082 dated 15.02.2019.  
2) Letter No. BARC/NRB/2019/48852 dated 12.03.2019.  
3) Letter No. BARC/NRB/2019/63228 dated 03.04.2019.  
4) Public Notice No. L-1/132/2013-CERC dated 18.04.2019.  
5) Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) (Fifth Amendment) Regulations, 2019.  
6) Explanatory Memorandum.

Dear Sir,

With reference to our above mentioned letters and subsequent issue of draft 5<sup>th</sup> amendment, the following may please be noted:

- In explanatory memorandum, the problem of BARC Tarapur is mentioned in point no. 2.4 (Page no. 4) as “... an entity with atomic energy in its portfolio should be exempted from DSM sign change requirement and charges.”

But, in the list of exempted entities in draft 5<sup>th</sup> amendment (Point no 4.5, Page 4) for adherence to sign change requirement, the case of BARC Tarapur has not been reflected.

- Presently, BARC Tarapur is having 10MW allocation from TAPS 3&4, Nuclear Power Corporation of India Limited (NPCIL). So the draft 5th amendment with +/- 10 MW allowable deviation will address the present problem of BARC Tarapur. However the power allocation of BARC Tarapur from TAPS 3&4 will increase beyond 10MW in the near future. As BARC Tarapur is not allowed to schedule its actual requirement, it will be required to pay huge DSM charges during feeder outages (as schedule will be higher than 10MW and drawal will be 0 MW).

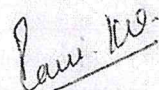
In view of the above, you are requested to grant exemption to BARC Tarapur from adherence to sign change requirement by including "Regional entity with specific allocation only from Nuclear Power plant" in the list of exempted entities in point no. 4.5, Page 4 of draft amendment.

As a result of implementation of fourth amendment, BARC Tarapur is paying huge amount in the form of sign violation additional charges as we are not being allowed to schedule as per actual load requirement. It is not possible for BARC Tarapur to change sign of deviation from schedule within 6 time blocks as the connected load is a Nuclear Facility with a load of around 6.5 MW, which is much lower than the fixed schedule of 10MW.

Our monthly DSM charges due to sign violation additional charges is around Rs. 2.5 Crore (payable), which is more than the energy charges being paid to TAPS 3&4, NPCIL and it will take another few months for the implementation of Fifth Amendment.

Therefore, you are also requested to provide exemption to BARC Tarapur for payment of sign violation additional charges w.e.f. 01.01.2019.

With best regards,

  
(K.V.Ravi)  
Chief Executive  
NRB, BARC