

<b>दिल्लीट्रांस्कोलिमिटेड</b> कार्यालय प्रबंधक (□.) एस एल डी सी बिल्डिंग, मिनटो रोड, न्यू दिल्ली-110002		<b>DELHI TRANSCO LIMITED</b> Office of DGM (Energy Accounting) SLDC Building, Minto Road, New Delhi-110002 Ph: 23211207, FAX No.23221069
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No.F.DTL/207/2019-20/DGM(EA)/05

Date 16.05.2019

**Secretary**

**Central Electricity Regulatory Commission**

4<sup>th</sup> Floor, Chanderlok Building,  
36, Janpath,  
New Delhi- 110001

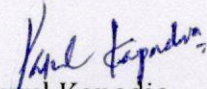
**Subject : DELHI SLDC comments on Deviation Settlement Mechanism and related matters (Fifth Amendment) Regulations, 2019.**

This is with reference to CERC Draft Amendment of Deviation settlement Mechanism and related matters (Fifth Amendment) Regulations, 2019 dated 18 April 2019 .

In this regards comments from Delhi SLDC are enclosed here with for your ready reference and kind consideration please.

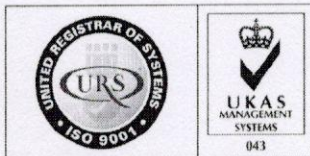
Thanking You

Yours faithfully

  
Parul Kapadia  
Dy.G.M .(Energy Accounting)

Copy to :-

1. OSD to Secretary (Power), GNCTD
2. Director (Operations), DTL
3. SE NRPC ,Delhi
3. Executive Director (T), SLDC
4. CEO BRPL, Delhi
5. CEO BYPL, Delhi
6. CEO TPDDL, Delhi
7. Director Power, NDMC, Delhi
8. GE, MES, Delhi



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**DELHI SLDC comments on Deviation Settlement Mechanism and related matters (Fifth Amendment) Regulations, 2019**

**1. Sustained Deviation Clause:**

Clause 4.5 of DSM(5<sup>th</sup> Amendment)regulation 2019 is reproduce here as under:

*“ Clause (10) of Regulation 7 of the Principal Regulations shall be substituted as:*

*"In the event of sustained deviation from schedule in one direction (positive or negative) by any regional entity (buyer or seller), such entity shall correct its position in the manner as specified under clauses (a) and (b) of this Regulation.*

*(a) Up to 31.03.2020, if the sustained deviation from schedule continues for 12 time blocks, the regional entity (buyer or seller), shall correct its position by making the sign of its deviation from schedule changed or by remaining in the range of +/- 10 MW with reference to its schedule, at least once, latest by 13th time block.....*

As observed in the past after implementation of, DSM 4<sup>th</sup> amendment the 6 time block sustained deviation clause entailed a heavy penalty on utilities. Delhi has a peculiar problem i.e. having 5 Distribution licensees who are managing their sign reversal individually. Probability of sign reversal in 6 time block for Delhi is quite impractical due to above. Further Delhi has got major share from central generating station and it will take good time to ramp up / ramp down the central generating station. So it is practically not possible for Delhi to comply with sign reversal in 6 time blocks.

5<sup>Th</sup> draft amendment of DSM amending the above provision for 12 time blocks for sign reversal with the additional provision of remaining in range of +/- 10 MW with reference to its schedule. This provision is better suited to Delhi and it is proposed to continue the same beyond 31.03.2020 also.



**2. Exemption from sign reversal in case of forced scheduling by NRLDC on account of minimum technical limit of generator:**

Delhi has peculiar demand curve, wherein peak demand reaches to 7000MW and minimum demand could reach to 1400MW. In these scenario mainly in winter season it is very difficult manage the sign reversal due to forced schedule by NRLDC on account of Minimum Technical Limit of central generators in spite of backing down all the generators including intra state and ISGS. Therefore it is proposed to exempt the sign reversal penalty in case of force scheduling.

**3. Post facto correction in implemented schedule by NRLDC:**

Several time post facto correction is being done by RLDC in the Generator schedule which leads to change in the drawl schedule of Delhi. This result in change in the position reversal. Delhi has to pay the penalty due to post facto correction by RLDC which shall not be done.

**4. Charges for Sustained Deviation:**

After 31.03.2020, the draft amendment proposed the penalty amount based on daily DSM instead of block wise. A utility violate the sign reversal in a particular block shall be panelized on the basis of the rate applicable on that block and not on the basis of DSM amount of whole day. The same principle is applicable while calculating the other additional surcharge.