

GUJARAT ENERGY TRANSMISSION CORPORATION LIMITED
Regd. Office: State Load Dispatch Centre, Gotri Vadodara – 390 021.
Telephone No.(0265) 6531132/2352103 (D)
Fax No.(0265) 2352019
Web site: sldcguj.com
Email: (1) celd@gebmail.com (2) casldc.getco@gebmail.com

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To,
The Secretary,
Central Electricity Regulatory Commission,
3rd and 4th Floor, Chanderlok Building,
36, Janpath.
New Delhi-110001

Sub: Comments of Gujarat SLDC, GETCO on draft CERC (Deviation Settlement Mechanism and related matters) (Fifth Amendment) Regulations, 2019.

Ref: This office letter GETCO/SLDC/Comm/F-5/376 dated 25.04.19

Respected Sir,

Vide letter under reference above, SLDC – Gujarat has furnished following comments on draft CERC regulation i.e. fifth Amendment of Deviation Settlement Mechanism and related matters 2019:

1. It is proposed in draft amendment (4.1), the following proviso under Regulation 7(1) of the Principal Regulations shall be deleted:

“Provided also that from a date not earlier than one year as may be notified by the Commission, the total deviation from schedule in energy terms during a day shall not be in excess of 3% of the total schedule for the drawee entities and 1% for the generators and additional charge of 20% of the daily base DSM payable / receivable shall be applicable in case of said violation.”

SLDC – Gujarat’s view:

The above clause should not be deleted in totality, but should be continued with some relaxation. The objective to keep this clause continue is to bring discipline among beneficiaries (3%) and generators (1%). All entities will try to adhere the schedule strictly and in turn, it shall help to maintain system frequency nearly 50 Hz. Moreover, it will help to reduce the triggering of regulation up in Ancillary service. The additional charges on violation of this limit may be between 5 to 10% instead of 20% of the daily base DSM payable / receivable.

2. In clause 4.5 (a) of proposed fifth amendment of DSM regulation, it is mentioned that *“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”*.

“Provided that each violation of the requirement under this clause shall attract an additional charge of 10% on the time block DSM payable / receivable as the case may be. It is applicable upto 31.03.2020”.

3. In clause 4.5 (b) From 01.04.2020 onwards, if the sustained deviation from schedule continues for 6 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 7th time block.

SLDC – Gujarat furnished that the range of +/- 10 MW is to be reviewed considering RE and demand variation. Following are the supporting reasons:

- a. Considering the large size grid entities/demand variation/RE injection variation the range of +/- 10 MW is trivial.
- b. Considering the similar aspects, Hon'ble commission has also allowed some liberty on additional charge & capping for small entities having schedule 400 MW and below i.e. additional charge and deviation for such entities is levied with reference to the schedule of 400 MW i.e. 48 MW of deviation is allowed without additional charge or capping.(CERC DSM amendment No. 3 : Amendment of principal regulation No 5 & 7)
- c. Further, the range of deviation for different categories of States (RE rich States) is also discriminated in CERC DSM amendment No.3.
- d. Further, as per CERC DSM amendment No.2, there is no additional charge on RE generators for absolute error up to 15%, which is more than 1000 MW for State like Gujarat.
- e. The major States are having almost 70 to 80 interface points for calculating the total drawl of the State. It is very difficult to get accurate data from all interface points in real time despite of taking all initiatives for getting accurate data. The two to five percent variation between actual SCADA data and ABT metered data are always persisting.
- f. In many States like Gujarat, the hydro resources are limited. Their generation schedule is decided by State Irrigation Department based on irrigation and drinking water requirement. In addition, Gas generators remain 'OFF Bar' due to high fuel cost and merit order dispatch. Therefore, the hydro and gas based stations are not on disposal of system operator when it actual requires.
- g. For RE rich States, it is very difficult to get accurate renewable generation forecast. It is very difficult to manage the system within ± 250 MW band of deviation.

SLDC – Gujarat Comments:

Therefore, the ± 10 MW range to be enhanced to ± 50 MW for non-RE rich State and ± 100 MW for RE rich State having combined RE capacity 3000 MW and above.

In past, SLDC Gujarat has informed that the sign change violation should be observed based on (real time) SCADA data instead of (post facto) SEM data. Following are the supportive reasons:

- I. The accuracy of SEM (0.2S class) is much higher than the SCADA data. (transducers accuracy class is to the tune of 0.5S class)
- II. The sampling rate of SEM is much higher than the SCADA data.
- III. Data recorded in the SEM is based on the load survey function (measurement of energy) whereas SCADA data is based on the instantaneous measurement of MW value, (energy is derived from such instantaneous value of MW through SCADA function). Hence, there will always be a difference between SCADA data and SEM data.

- IV. Sometimes, SLDC SIC has to take decision of wind energy curtailment, agriculture load rescheduling and load shedding for compliance of changing sign of deviation from schedule on RLDC SCADA/ State SLDC SCADA data. State SLDC SCADA & IT team always trying to minimize difference between State SLDC SCADA data and RLDC SCADA data so that the decision of SLDC SIC for changing sign would be more accurate.
- V. The ownership of all boundary points are with different entities like PGCIL, NTPC, NPCIL, UMPPs etc. They are reluctant for providing same class transducers / meters in series with existing ABT meter for real time monitoring of State drawl.

Looking to the various technical constraints mentioned above, it is requested to consider SCADA data instead of SEM data for the calculation of number of sign change violations.

Hon'ble CERC has proposed that the payment of additional charge for failure to adhere to sign change requirement as specified under clauses (a) & (b) of this regulation shall not be applicable to:

- a. renewable energy generators, which are regional entities
- b. run of river projects without poundage
- c. any infirm injection of power by a generating station prior to CoD of a unit during testing and commissioning activities, in accordance with the Connectivity


SLDC – Gujarat has requested that in case of (d) Natural calamities (e) Grid disturbances (f) Non-availability of real time data due to any of the technical reasons and (g) drawl of generators during reserve shut down / technical minimum, the penalty of sign change violation (if any) should not be applicable.

Sometimes, the heavy cyclonic wind and thereafter-heavy thunderstorm leads sudden rise in wind energy (around 25% of installed capacity of wind) and demand drop of around 10% of system demand within few time blocks. Such type of weather disturbances are unforeseen and uncontrollable. At that time, the deviation from schedule is unmanageable. In such force majeure event / grid disturbance, the actual drawl to be treated as schedule drawl to safeguard beneficiaries from undue UI cap and additional DSM charges.

In view of the above, it is requested to incorporate above points while finalizing the amendment in regulation. It is our humble request to Hon'ble commission to examine the possibility of implementation of the proposed amendment retrospectively i.e. with effect from 01.01.2019, to exonerate from the huge financial burden on all entities across the country.

Thanking you,

Yours Faithfully,



(B. B. Mehta)

Chief Engineer (LD)
SLDC, Vadodara.