



# Penna Cement Industries Limited.

PCIL/TRANSCO/02/2019-20

23<sup>rd</sup> April, 2019.

To  
The Secretary,  
CERC, New Delhi.

Sir,

Sub: Penna Cement Industries Limited, Captive Power Plant –  
Comments/Suggestions/objections on Draft Central Electricity Regulatory Commission  
(Deviation Settlement Mechanism and related matters) (Fifth Amendment) Regulations,  
2019 – Reg.

Ref: Your Public Notice No. L-1/132/2013-CERC, Dt: 18<sup>th</sup> April, 2019.

With reference to above your notice dated 18-04-2019, please find below our  
objections/comments/suggestions:

Clause No's as per Draft Regulation	Description as per Draft Regulation	Comments/Suggestions/Objections
Clause - 4.5: Clause (10) of Regulation 7 of the Principal Regulations shall be substituted as :	<p>"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 clause (a) and (b) of this Regulation</p> <p>( a ) Up to 31.03.2020, if the sustained deviation from schedule continues for 12 time blocks, the regional entity (buyer or seller), such entity shall correct its position by making sign of its deviation from schedule changed or by remaining the range of +/- 10 MW with reference to its schedule, at least once, latest by 13<sup>th</sup> time block.</p> <p>Provided that each violation of the requirement under this clause shall attract an additional charge of 10% on the time block DSM payable/receivable</p>	<p>( a ) we request to continue the sustained deviation from schedule for 12 time blocks few more years (instead of upto 31.03.2020) till we get an understanding on the mechanism</p> <p>Presently with SRLDC we are allowed to revise interstate schedules two days ahead only. With the present regulation of maintaining of sign change violation during blackout or forced</p>

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**CIN : U26942AP1991PLC013359**

**New CIN: U26942TG1991PLC013359**

	<p>as the case may be.</p> <p>( b ) From 01.04.2020, if the sustained deviation from schedule continues for 6 time blocks, the regional entity (buyer or seller ), shall correct its position, by making th 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 7<sup>th</sup> time block.</p>	<p>shutdown(breakdown) revision two days ahead is a constraint. So, we request to allow revision of inter-state transactions for all Captive generators in case of blackout or forced to shutdown due to breakdown from the time block 6<sup>th</sup> onwards in day irrespective of its station capacity. Since Captive stations are established on the basis of continues supply of power to captive consumer, in such a case by imposing the sign change violation for captive generators resulting leads to severe constraints.</p> <p>So, we request to allow revision of inter-state transactions for all Captive generators in case of blackout or forced to shutdown due to breakdown from the time block 6<sup>th</sup> onwards in day irrespective of its station capacity.</p> <p>Also requested increase the range to +/- 20 MW instead of 10 MW for few years till we understand the mechanism.</p> <p>( b ) We request to continue the clause ( a ) for few more years until the stabilization of new regulations and also increase the range of deviation from schedule to +/- 20 MW instead of 10 MW.</p>
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**Other Suggestions:**

1. Apart above objections, we would request to continue the old frequency based rates instead of Daily DSM rates (which are linked to ACP rates) which are more optimal considering the grid conditions.
2. We request to substitute the clause (1 to 18) of Regulation 4 of the Fifth Amedment Regulations,2018 (Regulation 7 of the Principal Regulation) as " *the words **"49.85 Hz"** shall be substituted by the words **"49.70 Hz"** and **"50.05 Hz"** shall be substituted by the words **"50.10 Hz"***

Please consider our above points for amendment of Regulations.

Expecting a favourable action from your end.

Thanking you,

Yours faithfully,  
for PENNA CEMENT INDUTRIES LIMITED



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