



PRAGATI POWER CORPORATION LIMITED
(An Undertaking of Govt. of NCT of Delhi)
Corporate Identity Number (CIN) - U74899DL2001SGC109135
(Regd. Off: "Himadri", Rajghat Power House Complex, New Delhi-110002)

No. Comm./CERC/F.6/2019-20/ **29**

Dated: 17.05.2019

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

Subject: - Comments of Pragati Power Corporation Ltd, Bawana on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) (Fifth Amendment) Regulations, 2019.

Ref: Public Notice No. I-1/132/2013-CERC dated 18th April-2019

Dear Sir,

This is in reference to above the comments / suggestions of PPS-III, Bawana on draft DSM regulations, (Fifth Amendment) Regulation, 2019 have been furnished as under:-

S. No.	Proposed DSM Amendment (with clauses)	Comments of PPCL								
1.	<p>4. Amendment to Regulation 7 (limits on Deviation Volume and consequences of crossing limit) of the Principal Regulation:</p> <p>4.5 Clause (10) of Regulation 7 of the Principal Regulations shall be substituted as under:</p> <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 clauses (a) and (b) of this Regulation.</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 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. Provided that violation of the requirement under this clause shall attract an additional charge as specified in the table below:</p> <table><tr><th>No. of violations in a Day</th><th>Additional Charge Payable</th></tr><tr><td>From first to fifth violation</td><td>For each violation, an additional charge @ 3% of daily base DSM payable / receivable</td></tr><tr><td>From sixth to tenth violation</td><td>For each violation, an additional charge @ 5% of daily base DSM payable / receivable</td></tr><tr><td>From eleventh violation onwards</td><td>For each violation, an additional charge @ 10% of daily base DSM payable / receivable</td></tr></table>	No. of violations in a Day	Additional Charge Payable	From first to fifth violation	For each violation, an additional charge @ 3% of daily base DSM payable / receivable	From sixth to tenth violation	For each violation, an additional charge @ 5% of daily base DSM payable / receivable	From eleventh violation onwards	For each violation, an additional charge @ 10% of daily base DSM payable / receivable	<p>There is discrepancy in clause 4.5 (b) of the proposed amendment with respect to relevant explanatory memorandum. In the explanatory Memorandum The Commission proposed to charge an additional charge from 01.04.2020 in the following manner :</p> <p>"From 1st April, 2020, in case of sustained deviation in one direction beyond the range of +/-10 MW from schedule, the entity shall correct its position by remaining within the allowable range or change the sign of deviation at least once, after 6 time blocks of sustained deviation. <u>Further, an additional charge at the rate of 3%, 5% and 10% of the daily base DSM payable/receivable for first to fifth, sixth to tenth, and eleventh & above violations respectively shall be charged."</u></p> <p>Where as in the proposed draft amendment the commission recommends to charge the additional charge in the following manner.</p> <p>i) For each violation, an additional charge @ 3% of daily base DSM payable / receivable from first to fifth violation.</p> <p>ii) For each violation, an additional charge @ 5% of daily base DSM payable / receivable from sixth to tenth violations.</p> <p>iii) For each violation, an additional charge @ 10% of daily base DSM payable / receivable from eleventh violation onwards.</p> <p>Thus the charges for additional first to five violations should be 3%, for sixth to tenth violation additional 5% and violation beyond eleventh violation will be additional 10%. This seems to be logical and reasonable otherwise the additional charges will be 15%, 25% and 10% to base DSM for each violation beyond ten of the Day.</p> <p>Therefore the sub clause of additional</p>
No. of violations in a Day	Additional Charge Payable									
From first to fifth violation	For each violation, an additional charge @ 3% of daily base DSM payable / receivable									
From sixth to tenth violation	For each violation, an additional charge @ 5% of daily base DSM payable / receivable									
From eleventh violation onwards	For each violation, an additional charge @ 10% of daily base DSM payable / receivable									

charges that is in the clause 4.5 (b) needs to be as amended as per following. This way the proposed amendment will be in line with the explanatory Memorandum and reasonable.

No. of violations in a Day	Additional Charge Payable
From first to fifth violation	an additional charge @ 3% daily base DSM payable receivable
From sixth to tenth violation	an additional charge @ 5% daily base DSM payable receivable
From eleventh violation onwards	an additional charge @ 10% daily base DSM payable receivable.

Alternatively the same may be in line with clause 4.5 (a) of above regulation with applicable charges of 3%, 5% and 10% over and above applicable time block DSM charges for each violation. Though in such amendment the clause 2.1 i.e daily based DSM will be irrelevant. However revised amendment alternatives of clause 4.5 (b) will be as follows.

No. of violations in a Day	Additional Charge Payable
From first to fifth violation	an additional charge @ 3% of each applicable time block DSM payable / receivable
From sixth to tenth violation	an additional charge @ 5% of each applicable time block DSM payable / receivable
From eleventh violation onwards	an additional charge @ 10% of each applicable time block DSM payable / receivable

2. **4.5 -----**
 Provided also that 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:
- renewable energy generators which are regional entities
 - run of river projects without pondage
 - 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 Regulations. Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) (Fifth Amendment) Regulations, 2019 Page 5
 - any drawal of power by a generating station for the start-up activities of a unit.
 - any inter-regional deviations.
 - forced outage of a generating station in case of collective transactions on Power Exchanges.

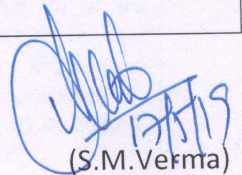
An additional exclusion for advance class gas turbine tuning as per requirement of change in season needs to be included as per follow:

g. The forced outage and the sustained deviation arising while carrying out DLN tuning of advanced F-class gas turbines.

As Advance F-class Gas turbines are required to be tuned in various seasons precisely to maintain a very lean mixture in order to have both high efficiency and lower emission levels. Although the gas turbine is tuned for a range of ambient temperature, however PPS-III Bawana gas turbines are required to be tuned twice in a year owing to the extreme weather conditions prevalent in Delhi. The first DLN tuning is carried out between March to September and second during October to February in a financial year, as the maximum temperature during Winter starts falling below the minimum temperature during Summer. This tuning is carried out by GE, the OEM with the turbines on load, and the control constants are set while gradually raising the load from 80 MW to Base

load followed by gradually reducing the load back to 80 MW. The duration over which the turbine remains at a particular load while setting the control constants is dependent upon the combustion dynamics which cannot be predicted with any great degree of certainty despite CDM having been installed. This varying duration results into sustained deviation and sometimes the machine trips on loss of flame as the fuel-air mixture is optimized to be leaner and leaner.

More ever tuning process involves coordination of GE at site and monitoring expert in USA. Therefore the tuning process for a turbine is around ten hours duration and may last for larger duration as per parameters achieved during tuning. The PPS-III Bawana plant has four numbers gas turbines and may need around eighty hours tuning in all machines in a financial year. The behaviour of these machines during tuning process will be similar to condition as mentioned in clause a -f above. It is therefore requested to include the sub clause "g" as above.


(S.M. Verma)

Director (Tech.)