

Sitapuram Power Limited

 CIN: U40109TG2005PLC046893
 Works
 Sitapuram, Dondapadu Village
 Chinthalapalem Mandal
 Suryapet Dist.
 Telangana 508 246, India

Ref.No:- SPL/CERC/ND/IE/14/05/19/01

 14th May, 2019.

 To
 Mr. Sanoj Kumar Jha,
 Secretary,
 CERC, New Delhi.

Sir,

 Sub: Sitapuram Power 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: 18th 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
3.2 Clause (3) of Regulation 5 of the Principal Regulations shall be substituted as under :-	"The Cap rate for the charges for deviation for the generating stations, irrespective of the fuel type and whether the tariff of such generating station is regulated by the Commission or not, shall not exceed 303.04 Paise/kWh."	We are requesting to effect the Cap rate of 303.04 Paise/Kwh from 1 st Jan 2019 in DSM.
Clause - 4.5: 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 clause (a) and (b) of this Regulation	

	<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 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.</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</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 to adopted on the mechanism Presently with SRLDC we are allowed to revise interstate schedules two days ahead only (Apply on or before 17:30 hrs only after 2 clear days). With the present regulation of maintaining of sign change violation during blackout or forced shutdown (breakdown) revision two days ahead is a constraint. So, we request to allow revision of inter-state transactions for all Captive Generators & on account of our Captive Consumers in case of blackout or forced to shutdown due to breakdown from the time block 6th 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 6th onwards in day irrespective of its station capacity.</p> <p>(b) We request to continue the clause (a) for few more years until the stabilization of new regulations.</p>
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	<p>schedule changed or by remaining in the range of +/- 10 MW with reference to its schedule, at least once, latest by 7th time block.</p> <p><u>No. of violations in a Day</u></p> <p>From first to fifth violation For each violation, an additional charge@ 3% of daily base DSM payable /receivable</p> <p>From sixth to tenth violation For each violation, an additional charge @ 5% of daily base DSM payable / receivable</p> <p>From eleventh violation onwards For each violation, an additional charge @ 10% of daily base DSM payable / receivable</p>	
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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.

Please consider our above points for amendment of Regulations.

Expecting a favorable action from your end.

Thanking you,

Yours faithfully,
for SITAPURAM POWER LIMITED

I. EDWARD

Deputy General Manager – Electrical.



Edward
14/05/12