



TRANSMISSION CORPORATION OF TELANGANA LIMITED
VIDYUT SOUDHA::HYDERABAD - 82
Website:tstransco.in CIN No.U40102TG2014SGC094248

From
Chief Engineer/SLDC,
TSTransco, Room No.613,
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To
Secretary, CERC.
3 rd & 4 th Floor, Chanderlok Building
36, Janpath, New Delhi- 110001.

Lr.No.CESLDC/SESLDC/DEPP1/ADE-2/F.CERC/D.No. 67/19, Dt: 14.05.2019

Sir,

Sub: TSTransco - SLDC – Draft DSM 5th amendment regulations- Submission of
comments - reg.

Ref: Public Notice No. L-1/132/2013-CERC, Dt: 18.04.2019.

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With reference to the above, I am directed to submit the following views on the
proposed draft regulations, for your kind consideration.

a) Regulation 7(1)

The following are the views of TSTransco:

Welcome the deletion of Regulation 7(1), which will reduce the burden on Discoms
and also improve the operational flexibility in view of increasing penetration of RE
Generation.

b) Regulation 7(4)

The following are the views of TSTransco:

Welcome the reduction in cap rate for deviation proposal, which will reduce the
burden on Discoms and also improve the operational flexibility in view of increasing
penetration of RE Generation.

c) Regulation 7(10)

The following are the views of TSTransco:

(i) Remarks of SLDC for deletion of the clause :

- (a) The Basic function of the system operator is to maintain Load Generation
Balance(LGB) and ensure that the system is operating in a secure manner within
the permitted operating range. This will ensure safety and security of the Grid.

P.T.O.

- i. With the high injection of RE power, entities are facing lot of challenges in balancing deviation which is leading to severe financial constraints.
- ii. As per present regulation any trading in the power exchange is being implemented with a gate closure time of 3 clear hours.
- iii. In such event, for maintaining load generation balance, existing reserves like hydel, flexing of intra state generation are being utilised.

(b). In this context, for effecting sign change after every six/twelve time blocks, the system operator is forced to channelise all the available resources and time towards achieving this objective.

(c). This is leading to utilisation of balance existing limited resources like hydel generation which could otherwise have been utilised in a more effective manner during peak demand period. Depletion of these hydel resources will require this energy to be compensated from other sources thus resulting in more commercial implication.

(d). Further, effecting of sign change after every six/twelve time blocks, it is observed that this has no much effect on system operation/parameters and leading to frequent excursion of frequency and Generation levels of Generators. Rather, it is leading to the operator having to focus his attention to effecting sign change rather than focusing on the primary objective of Load Generation Balance and secure operation of system. Also, impacting Base Generating stations for frequent up/down variations in Generation. Generators are expressing difficulty in frequent variation in Generation level.

(e). Hence, it is requested to examine to delete the above clause regarding sign change violation.

(ii) Remarks of SLDC on proposal in CERC DSM 5th Amendment Regulations:

(a). However, it is observed that this sign change violation is introduced with the objective of maintaining the Grid frequency as close to 50Hz as possible with minimum possible deviation.

Contd...

- (b). This may be examined after implementation of intrastate ABT, putting in place quick contingency markets (gate closure time of 4 time blocks), automatic generation and demand response schemes in state level. This will provide the necessary resources/flexibility, for the system operator to effect these sign change.
- (c). In such a scenario, the permitted deviation range of ± 10 MW with reference to schedule is very less as there is inherent deviation between SEM and SCADA data which are generally found to be in the order of 50 to 100 MW. Hence, the permitted deviation from schedule may be considered as ± 50 MW.
- (d). Further, an utility is supposed to underdraw at low Grid frequency (< 49.85 Hz) and overdraw at high frequency (> 50.05 Hz) to minimise Area Control Error (ACE). For any deviation to the contrary, additional deviation charges are imposed. Hence, it is also requested to examine non imposition of penalty for sign change for not changing the sign to overdraw at low frequency (< 49.85 Hz) and for not changing the sign to underdraw at high frequency (> 50.05 Hz) as these instances are no way helpful to the objective to maintain system frequency close to 50 Hz.

It is requested to kindly consider the above views and suitably amend the proposed clauses in the DSM 5th amendment regulations.

Yours faithfully,


Chief Engineer/SLDC

Copy submitted to Director (Grid Operations)/TSTransco.

Copy to:

Superintending Engineer/Tech. to Chairman & Managing Director/ TSTransco.

P.S. to Joint Managing Director (Finance, Comml., & HRD)/TSTransco.

Member Secretary/SRPC/29, Race Course Cross Road/Bengaluru-560009 } for favour of
Executive Director/SRLDC/ 29, Race Course Cross Road/Bengaluru-560009 } information