

BEFORE THE CENTRAL ELECTRICITY REGULATORY COMMISSION
NEW DELHI

Filing No. _____

Case No. _____

IN THE MATTER OF

Comments and suggestions on the draft Central
Electricity Regulatory Commission (Deviation
Settlement Mechanism and related matters)
(Fifth Amendment) Regulation, 2019

AND

IN THE MATTER OF

Torrent Power Limited (TPL)
“Samanvay”, 600, Tapovan,
Ambawadi, Ahmedabad – 380 015

.....APPLICANT

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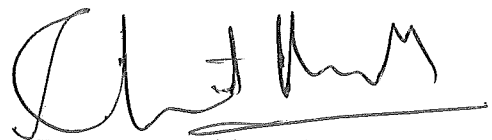
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.....FILED BY

Torrent Power Ltd

Ahmedabad

Date: 15.05.2019



Represented by Chetan Bundela

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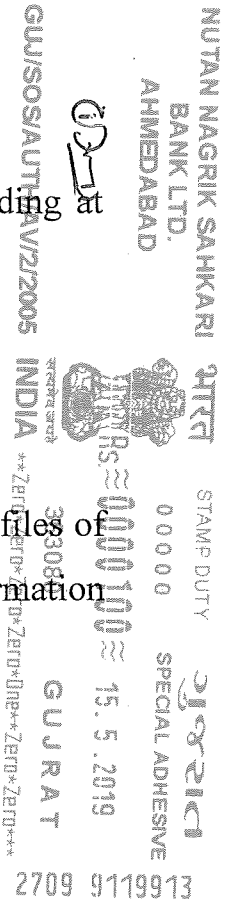
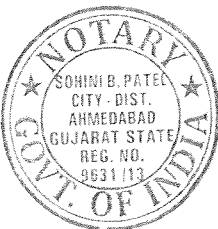
Ambawadi, Ahmedabad – 380 015

.....APPLICANT

Affidavit verifying the Petition

I, Chetan Bundela, son of Sh. Manharlal Bundela, aged about 47, residing at Ahmedabad do hereby solemnly affirm and state as follows:

1. I am duly authorised by the Company to make this affidavit.
2. That the facts stated in the submissions are based on the records and files of the Company and they are true and correct to my knowledge, information and belief and I believe the same to be true and correct.





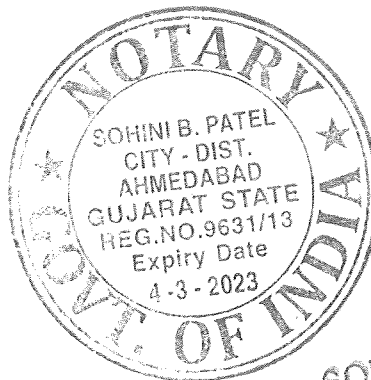
Solemnly affirmed at Ahmedabad on this 15th day of May, 2019.

DEPONENT

VERIFICATION:

Solemnly affirm at Ahmedabad on this 15th day of May, 2019 that the contents of the above affidavit are true to my knowledge and belief and no part of it is false and nothing material has been concealed therein from.

DEPONENT



Sr. No. : 53/c/04 2019

S. Patel
SOHINI B. PATEL
NOTARY
GOVT. OF INDIA
15/05/2019

SOLEMNLY AFFIRMED
BEFORE ME

S. Patel
SOHINI B. PATEL
NOTARY
GOVT. OF INDIA
15/05/2019

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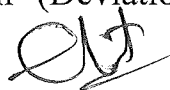
“Samanvay”, 600, Tapovan,

Aambawadi, Ahmedabad – 380 015

.....APPLICANT

**TORRENT POWER LIMITED RESPECTFULLY SUBMITS AS
UNDER:**

- 1 Torrent Power Limited (TPL/Company) is a Company incorporated under the Companies Act, 1956 having its registered office at “Samanvay”, 600, Tapovan, Ambawadi, Ahmedabad 380 015. TPL is engaged in the businesses of generation, transmission and distribution of electricity accordance with the provisions of the Electricity Act, 2003.
- 2 The Hon’ble Commission in exercise of its powers conferred under Section 178 of the Electricity Act, 2003 has issued the draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related



matters) (Fifth Amendment) Regulation, 2019 inviting suggestion/objections from the stakeholders vide its draft notification dated 18th April, 2019.

- 3 In this regard, TPL is submitting its comments/ suggestions at **Enclosure-1** for the kind consideration of the Hon'ble Commission.

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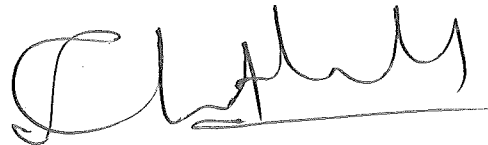
PRAYERS:

It is respectfully prayed that the Hon'ble Commission may be pleased:

1. To consider the submissions made hereinabove.
2. To condone any inadvertent omissions/ errors/ shortcomings.
3. To grant any other relief as it deems fit and appropriate under the circumstances and in the interest of justice.

.....FILED BY

Torrent Power Ltd

A handwritten signature in black ink, appearing to read 'Chetan Bundela', written over a horizontal line.

Represented by Chetan Bundela

Ahmedabad

Date: 15.05.2019

Enclosure- 1

Or

Torrent Power Limited - Comments on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) (Fifth Amendment) Regulations, 2019

Sr. No.	Particulars	Draft Amendment	Comments
1	Short Title and Comments	Regulation 1(2) These regulations shall come into force with effect from the date of notification in the official gazette.	The implementation of the 5th amendment should be from prospective date. However, the penalties for sign change violations and applicable additional charges (as per the 4th amendment) from 01-01-2019 i.e. the date of enforcement of the 4th amendment to the date of implementation of 5th amendment should not be levied.
2	Sustained deviation from schedule in one direction	Regulation 7 (10) "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	We suggest that the penalties for sustained unidirectional deviation should not be implemented for intra-state entities as independent actions by intra-state entities towards change in their

Torrent Power Limited - Comments on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) (Fifth Amendment) Regulations, 2019

Sr. No.	Particulars	Draft Amendment	Comments
		Regulation. (a) Up to 31.03.2020, 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. (b) From 01.04.2020, if the sustained deviation from schedule continues for 6 time blocks, the regional entity	respective polarity may adversely affect polarity control at inter-state boundary. Further, we believe that the provision in Regulation 7 (10) (a) is sufficient to maintain the grid discipline in respect of sustained deviation by a regional entity. Accordingly, the provision in Regulation 7 (10) (a) should be continued beyond 01-04-2020 for a reasonable period of 5 years. Subsequent to that, it may be reviewed based on maturity attained in terms of advancement in technology for real time data and in Renewable Energy forecast.

Torrent Power Limited - Comments on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) (Fifth Amendment) Regulations, 2019

Sr. No.	Particulars	Draft Amendment	Comments
		(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: 	