

Comments by Talwandi Sabo Power Limited, Distt- Mansa, Punjab on CERC (Deviation Settlement Mechanism and related matters) (Fifth Amendment) Regulations, 2019

Sl.No.	Clause as per Draft Regulation	Suggestion	Rationale
1	4.5 Clause (10) of Regulation 7 of the Principal Regulations shall be substituted as under: "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. (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. (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.....	Suggestion Clause 4.5 (b) to be deleted.	Supercritical thermal Plants are designed for base load operation and frequent load variations are not recommended for safe, reliable and efficient operation. Clause 4.5 (b) mandates for making the sign of its deviation from schedule changed after every 6 time blocks, this will bring the plant and machinery at undue stress and more prone to equipment failure. Further, the additional charges for violation of 4.5 (b) is also on higher side. Hence, the provisions as contained in 4.5 (a) should continue from 01.04.2020 also.



2	4.5 Clause (10) of Regulation 7 of the Principal Regulations shall be substituted as under: 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: a. renewable energy generators which are regional entities b. run of river projects without pondage. c. 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. d. any drawal of power by a generating station for the start-up activities of a unit. e. any inter-regional deviations. f. forced outage of a generating station in case of collective transactions on Power Exchanges.	Additional clauses to be included on which no additional charges should be applicable due to violation of sign change as given below: g. RGMO intervention preventing the generator from following the mandatory sign change requirement after 12th time block (or other time block as in force). h. In case of unforeseen conditions like station black out /forced Unit tripping's etc. -The Generator should not be penalised against sign reversal	In case, the generator has to reduce its generation as compared to Scheduled Generation to effect the sign change, however the RGMO/FGMO action is in opposite direction. In such a scenario there is a possibility that the generator may not achieve sign change. The Generator should not be penalised for not bypassing the instructions of RGMO/FGMO to maintain grid stability. Forced outages of Units including trippings due to blackout/ line failure etc. may lead to unintentional violation of sign change requirement. Thus, same should not be considered for levying penalty due to violation of sign change requirement.
3	Implementation of this 5th amendment should be made retrospectively from the date of applicability of the 4th amendment and all the previous accounts issues should be revised accordingly as the generator have incurred huge penalty under violation of sign change due to frequent changes in Schedule made by the Discoms to avoid their own violations		

