

 CIN - U40108CT2003SGC015820	CHHATTISGARH STATE POWER TRANSMISSION COMPANY LIMITED छत्तीसगढ़ राज्य विद्युत पारेषण कम्पनी मर्यादित (C.G. Govt. Undertaking) (छत्तीसगढ़ शासन का एक उपक्रम) CHHATTISGARH STATE LOAD DESPATCH CENTRE: RAIPUR छत्तीसगढ़ राज्य भार प्रेषण केन्द्र, रायपुर	
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Ref: 03-02/SLDC/ 2038

Raipur, dtd.- 27 DEC 2023

To,

✓ The Secretary,

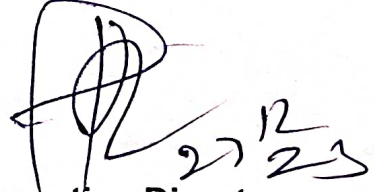
Chhattisgarh State Electricity Regulatory Commission,
Irrigation Colony, Shanti Nagar,
Raipur, Chhattisgarh - 492001

Sub: Comments/views on draft of Chhattisgarh State Electricity Regulatory Commission (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations, 2024.

Ref: Hon'ble CSERC letter no. 03/CSERC/Tariff/Intra-State DSM Regulations 2024/2024/1611 /Raipur, dtd. 06/12/2023

In above subjected matter CSLDC's submission is enclosed herewith in compliance with the directives of Hon'ble CSERC on the draft of Chhattisgarh State Electricity Regulatory Commission (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations, 2024.

Encls: As Above. (Page No. 1-6)


Executive Director
SLDC, CSPTCL, Raipur

Suggestions/Comments on draft- CERC (Intra State DSM and Related matters) Regulations, 2024
along with Statement of Reasons (SOR)

Sr. No.	Regulation No.	8. (2)
1.	Draft Regulation:-	For long-term access customers and medium-term open access customers, the provisions of the state Grid code and the CERC (Connectivity and Intra-state open Access) Regulations 2011, as amended from time to time, shall be applicable for declaration of capacity, scheduling and elimination of gaming. The Seller shall submit daily declared capacity and accordingly the Buyers including beneficiary shall submit their requirement to SLDC in 15 minutes time block and by considering these the SLDC/RLDC/PX, as the case may be, shall finalize the injection/drawal schedule.
	Suggestion:-	Reg. 8. (2) Needs modification. w.r.t. timelines of DC/Requirement submission.
	Reason:-	On Commencement of CERC-IEGC-2023 w.e.f. 01/10/2023, provisions regarding new timelines as per Reg. 49 (1) for submission of DC/requisition by Seller/Buyer including CSEB beneficiary and provision as per Reg. 31 (2) for submission of daily Demand estimation, needs to be incorporated.
	Modified Regulation:-	For long-term access customers and medium-term open access customers, the provisions of the CERC IEGC 2023 , State Grid Code, and the CERC (Connectivity and Intra-state open Access) Regulations 2011, as amended from time to time, shall be applicable for declaration of capacity, scheduling and elimination of gaming. The Seller shall submit daily declared capacity by 07:00 Hrs. of "D-1" day, for supply of power on "D" day , and accordingly the Buyers including beneficiary shall submit their requirement to SLDC in 15 minutes time block by 08:00 Hrs. of "D-1" day , and by considering these the SLDC/RLDC/PX, as the case may be, shall finalize the injection/drawal schedule
2.	Regulation No.	8.3
	Draft Regulation:-	The Seller supplying power on short-term shall submit monthly declared capacity and accordingly the Buyer's including CSPDCL shall submit their requirement to SLDC in 15 minutes time block and by considering these the SLDC shall finalize the injection/drawal schedule. If the Sellers/Buyers fails to submit the declared capacity/drawal requirement by 23 ⁰⁰ of current month for the scheduling of power in next month, then the same shall be considered as zero for all purposes. However, maximum of two revisions of schedule per month under advance intimation to SLDC and distribution licensee shall be allowed with

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	effect from 00.00 hours of next day. This mechanism shall be followed for short-term power procurement by CSPDCL.
Suggestion:-	Reg. 8. (3) Needs modification w.r.t. ambiguity due to nature of STOA power being scheduled.
Reason:-	Ambiguity regarding scheduling and despatch of Seller/Buyer who availed intra state short term open access and for those Seller with whom CSPDCL is having short-term power procurement mechanism.
Modified Regulation:-	The Seller supplying power on short-term shall submit monthly declared capacity in advance by "D-7" day, for supply of power starting on "D" day, which may either fall in the same month as the "D-7" day or in the subsequent month and accordingly the Buyers including CSPDCL shall submit their requirement to SLDC in 15 minutes time block and considering these the SLDC shall finalize the injection/drawal schedule. If the Sellers/Buyers fails to submit the declared capacity/drawal requirement by "D-7" day as mentioned above, for the scheduling of power in next month, then the same shall be considered as zero for all purposes. However, maximum of two revisions of schedule per month under advance intimation to SLDC and distribution licensee shall be allowed, with effect from 00.00 hours of next day, (i.e., 2 nd no. revision cannot be applied within the same day when 1 st revision is already being submitted). This mechanism shall be followed for short-term power procurement by CSPDCL. Provided also that the Seller/Buyer availing intra state short term open access, and seeking cancellation or downward revision of short term open access quantum shall be dealt as per Regulation 40 (2) of CSERC (Connectivity and Intra-state open Access) Regulations 2011, as amended from time to time.
3. Regulation No.	8. (6)
Draft Regulation:-	In case of day ahead transactions, the declared capacity/schedules shall be conveyed by the Seller to SLDC; in one day advance up to 09.00 Hrs. of the day. The Buyer including beneficiary shall confirm the time-block wise requirement to SLDC in one day advance up to 11:00 Hrs. of the day. If no confirmation from Buyer including beneficiary is received within above time limit the SLDC shall consider zero requirement. Accordingly the SLDC shall issue the drawal and injection schedules by 18.00 Hrs. of the day for the next day. Thereafter, normally no changes shall be registered in the schedule on the day-ahead basis.

Suggestion:-	Reg. 8. (6) Needs modification w.r.t. timelines of DC/Requirement submission pertaining to day ahead transactions of STOA power being scheduled.
Reason:	On Commencement of CERC-IEGC-2023 w.e.f. 01/10/2023, provisions regarding new timelines as per Reg. 49 (1) for submission of DC/requestion by Seller/Buyer including CSEB beneficiary and provision as per Reg. 31 (2) for submission of daily Demand estimation, needs to be incorporated.
Modified Regulation:	In case of day ahead transactions of short term open access , the declared capacity/schedules shall be conveyed by the seller to SLDC; in one day advance up to 07.00 Hrs. of the day. The Buyer including beneficiary shall confirm the time-block wise requirement to SLDC in one day advance up to 08:00 Hrs. of the day. If no confirmation from Buyer including beneficiary is received within above time limit the SLDC shall consider zero requirement. Accordingly the SLDC shall issue the drawal and injection schedules by 10:00 Hrs. of the day for the next day. Thereafter, normally no changes shall be registered in the schedule on the day-ahead basis.
4. Regulation No.	8. (7)
Draft Regulation:	To discourage frivolous revisions, SLDC may, at its sole discretion, refuse to accept schedule/capability changes of less than two (2) percent of previous schedule/capability or 0.5 MW whichever is more. The schedule shall not be revised except in case of forced outage of generating unit.
Suggestion:-	Reg. 8. (7) Needs modification w.r.t. provisions of approved CSERC-Operating Procedure-2011.
Reason:	As per Reg. 7.14 (4) of approved CSERC Internal Operating Procedure of CG state grid-2011 i.e., maximum of 8 no. of revisions is allowed for each three hour time slot starting from 00:00 Hrs. during the day (except in case of plant emergency).
Modified Regulation:	To discourage frivolous revisions, SLDC may, at its sole discretion, refuse to accept schedule/capability changes of less than two (2) percent of previous schedule/capability or 0.5 MW whichever is more. The schedule shall not be revised except in case of forced outage of generating unit. Provided that revisions of power generating stations shall be effective from 6th time block, the first being the time-block in which revision was submitted. There may be maximum of 8 revisions for each 3 hour time slot starting from 00:00 Hrs. during the

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	day. Provided also that in case of a plant emergency where multiple units trip and that are to be synchronized one by one, the DC may need to be revised accordingly several times for proper declaration of actual injection. In such cases the ceiling of 8 revisions in a day may be relaxed.
5.	8. (11)
Regulation No.	
Draft Regulation:	In case of any grid disturbance, scheduled injection of the Sellers and scheduled drawal of the Buyers shall be deemed to have been revised in proportion to their actual generation/ drawal for all the time blocks affected by the grid disturbance. Certification of grid disturbance and its duration shall be published by the SLDC/CSPDCL in website within a week of its occurrence by the concerned licensee.
Suggestion:-	Reg. 8. (11) Needs modification due to Non-compliance of above provision by CSPDCL and absence of Certification by CSPDCL in its website.
Reason:	1. CSPDCL is directed to provide relevant data related to grid disturbances and constraints at 33 KV transmission system to SLDC, so the SLDC could be able to revise the SDSMA bills raised to the petitioner as per CERC order dated 19/12/2022 in Petition No. 43 of 2022. 2. In compliance, SLDC developed module in its Web Based Scheduling Software WBES so that "Request Form" is generated based on grid disturbance details submitted by "Requester" (affected Biomass Generator). However, delay in verification and certification of "Request Form" for grid disturbance and its duration by concerned authorities of CSPDCL for 33 KV system, resulting in difficulty at SLDC end to process the verified and certified uploaded "Request Form" in its WBES. Thus, necessary compliance by SLDC CERC order dated 19/12/2022, is not achieved.
Modified Regulation:	In case of any grid disturbance, scheduled injection of the Sellers and scheduled drawal of the Buyers shall be deemed to have been revised in proportion to their actual generation/ drawal for all the time blocks affected by the grid disturbance. Certification of grid disturbance and its duration shall be published by the SLDC/CSPDCL in website within a week of its occurrence by the concerned licensee. Provided that in absence of certification by CSPDCL in their website within a week of its occurrence, CSPDCL shall certify the "Request Form" as per provisions and timelines prescribed in "Procedure" prepared by SLDC for revised SDSMA on account of

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Grid Disturbance on CSP TCL/CSPDCL system. Provided also that any request for processing "Request Form" beyond timelines of the above "Procedure" shall not be considered by SLDC.	
Regulation No.	8. (13)
Draft Regulation:	Revision for RE - generator:- There may be one (01) revision for each time slot of one and half hours starting from 00:00 Hrs. of a particular day, subject to a maximum of sixteen (16) revisions during the day. Provided that The revision No. shall start from -1 (for first AVC/ Schedule) to be submitted by 10:00 Hrs. of preceding day as per the provisions of the State Grid Code and will be increased step-by-step as 0,1,2,3,.....n (for subsequent revisions), subject to the condition that QCA/Generator(s) may inform the modifications/changes to be made, if any, in the AVC/ Schedule to the SLDC latest by 21:30 Hrs. of preceding day as per the State Grid Code. No revision in Forecast shall be accepted after 21:30 Hrs.
Suggestion:-	Reg. 8. (13) Needs modification due to timelines of DC (First AVC/Schedule and Forecast) in line with CERC0-IEGC-2023.
Reason:	On Commencement of CERC-IEGC-2023 w.e.f. 01/10/2023, provisions regarding new timelines as per Reg. 49 (1) for submission of DC/requestion by Seller/Buyer including CSEB beneficiary and provision as per Reg. 31 (2) for submission of daily Demand estimation, needs to be incorporated.
Modified Regulation:	Revision for RE - generator:- There may be one (01) revision for each time slot of one and half hours starting from 00:00 Hrs. of a particular day, subject to a maximum of sixteen (16) revisions during the day. Provided that The revision No. shall start from -1 (for first AVC/ Schedule and Forecast) to be submitted by 07:00 Hrs. of preceding day as per the provisions of the CERC IEGC -2023 and State Grid Code, as amended from time to time, and will be increased step-by-step as 0,1,2,3,.....n (for subsequent revisions) of a particular day , subject to the condition that QCA/Generator(s) may inform the modifications/changes to be made, if any, in the AVC/ Schedule and Forecast to the SLDC latest by 21:30 Hrs. of preceding day as per the State Grid Code. No revision in Forecast shall be accepted after 21:30 Hrs of preceding day .


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Comments/views on draft Chhattisgarh State Electricity Regulatory Commission (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations, 2024

Ref:- Hon'ble CSERC letter no. 03/CSERC/Tariff/Intra-State DSM Regulations 2024/2024/1611 /Raipur, dtd. 06/12/2023

1. Regulation 3.37 – Reference Charge Rate

- (a) In this Regulation, the Reference Charge Rate includes only energy charge, but the fixed charge is also part of the Tariff, hence the words “energy charge” should be replaced by the words “sum of fixed charge and energy charge, if any”.

Justification:- Hon'ble CSERC determine both the fix charges and energy charges under Section 62 or Section 63 of the Act. ~~Please refer the Tariff order of the Commission.~~

- (b) The DSM charges is issued by WRPC to all constituent of Western Region and the DSM charges for Chhattisgarh constituent is issued by WRPC to CSPDCL, so the words “issued to CSPDCL” should be added after the words “DSM Statement” for the sake of clarity.

- (c) Since the reference charge rate is different for each entities and only normal rate is mentioned by WRPC in the DSM statement issued to CSPDCL, not the reference charge rate, so it will be appropriate to replace the reference charge rate with normal rate of charges for deviation.

2. Regulation 3.45 – All the entities whose scheduling and deviation charges to be prepared by SLDC should be registered with SLDC as per CSERC (Fees and charges of State Load Despatch Centre and other related matters) Regulations, 2012. In line with the above, this Regulation should be replaced with the following:

“State Deviation Settlement Mechanism Account (SDSMA)” means weekly/monthly State Deviation Settlement Mechanism Account prepared by State Load Despatch Centre for the billing and settlement of Deviation charges for all registered entities with SLDC.

3. Regulation 6.2 – Computation of Deviation

- (a) In Clause (1) and (2) of this Regulation, the word “KWh” should be replaced by the word “MWh”.

4. Regulation 6.3 – In this Regulation, the Words “issued to CSPDCL” should be added after the words “DSM Statement” for the sake of clarity.

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