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21/03/2024
21th March 2024

SBPIL/2023-24/1812

To,
The Secretary,
CSERC, Irrigation Colony, Shanti Nagar,
Raipur, Pin – 492001.

Sub: Comment/Suggestion on draft Intra-State Deviation Settlement Mechanism and Related Matter, Regulation 2024 dated 01-03-2024.

Dear Sir,

With reference to the above cited subject we hereby submitting our comment/suggestion in the following points given below:

1) Clause no. 5.4 (Applicability of Deviation Charges Component of the Intra-State ABT) Points no (d):

Only those wind, solar and wind-solar hybrid generating plants which have achieved COD from 04.10.2019 (i.e., after notification of CSERC DRE Regulations, 2019) and upto 27.12.2023 shall not be subject to deviation charges under these Regulations.

Our Suggestion: Those plant whose delay condonation of COD has been approved by the Hon'ble CSERC beyond the date of 27-12-2023, those plant also shall not be subject to deviation charges under these Regulations.

2) Clause no. 6.4 (Charges for Deviation) Points no (2):

Inter-State open access transactions: The deviation charges applicable for over injection /under drawl shall be prepared by considering 95% of the applicable rates specified for Charges of Deviation, when these charges are receivable to the Seller/Buyer and the deviation charges applicable for under injection /over drawl shall be prepared by considering 105% of the applicable rates specified for Charges of Deviation, when these charges are payable by the Seller/Buyer.

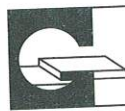
Our Suggestion: The charges for deviation for over Injection by considering 95% and Under Injection by considering 105% of applicable rate should not be levied since this is the extra Burdon on generating station over and above their UI penalty and Hon'ble CERC also not taking charges under this methodology therefore this clause shall be removed and all the generating station shall pay as per the rate specified in the WRPC website.

CIN No. : U27106CT2002PLC015184

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3) Clause no. 6.4 (5) (Charges for Deviation):

Entity	Charges for deviation payable to State Deviation Pool Account	
Seller	Deviation by way of over injection	Deviation by way of under injection
General Seller other than generating stations based on municipal solid waste.	Zero: Provided that such Seller shall be paid back for over injection @ the reference charge rate for deviation upto 10% of schedule or 100 MW, whichever is less.	(i) @ the reference charge rate for deviation up to 10% of schedule or 100 MW, whichever is less; (ii) @ 120% of the normal rate of charges for deviation by way of under-injection beyond 10% of schedule or 100 MW, whichever is less and up to 15% of schedule or 150 MW, whichever is less; and (iii) @ 150% of the normal rate of charges for deviation beyond 15% of schedule or 150 MW, whichever is less.

Our Suggestion: -

Deviation by way of over injection	@ the reference charge rate for deviation upto 12% of schedule
Deviation by way of under injection	@ the reference charge rate for deviation up to 12% of schedule @ 120% of the normal rate of charges for deviation by way of under-injection beyond 12% of schedule upto 20% of schedule or 150 MW, Whichever is less. @ 150% of the normal rate of charges for deviation beyond 20% of schedule or 150 MW, whichever is less.

**4) Clause no. 7 (Limits on normal rate of Charges for Deviations and Charges
for deviation)**

Frequency Limits	Draft CSERC DSM Regulation	Our Suggestion
	Seller	Seller
	Receivable by way of Over Injection	Receivable by way of Over Injection
49.90 - 49.95 Hz	120 % of Reference Charges	120 % of Reference Charges
<= 49.90 Hz	150 % of Reference Charges	150 % of Reference Charges
	Paid by way of Under Injection	Paid by way of Under Injection
49.90 - 49.95 Hz	150 % of Reference Charges Or 120 % of Normal Charges Whichever is Higher	150 % of Reference Charges Or 120 % of Normal Charges Whichever is Higher

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<= 49.90 Hz	200 % of Reference Charges Or 150 % of Normal Charges Whichever is higher	200 % of Reference Charges Or 150 % of Normal Charges Whichever is Higher
	Buyer	Buyer
	Receivable by way of Under Injection	Receivable by way of Under Injection
49.90 - 49.95 Hz	120 % of Normal Charges	120 % of Normal Charges
<= 49.90 Hz	150 % of Normal Charges	150 % of Normal Charges
	Paid by way of Over Injection	Paid by way of Over Injection
49.90 - 49.95 Hz	150 % of Normal Charges Or 120 % of Normal Charges Whichever is Higher	150 % of Normal Charges Or 120 % of Normal Charges Whichever is Higher
<= 49.90 Hz	200 % of Normal Charges Or 150 % of Normal Charges Whichever is Higher	200 % of Normal Charges Or 150 % of Normal Charges Whichever is Higher
	Seller	Seller
	Receivable by way of Over Injection	Receivable by way of Over Injection
50.03 - 50.05 Hz	50 % of Reference Charges	50 % of Reference Charges
>= 50.05 Hz	0	0
	Paid by way of Under Injection	Paid by way of Under Injection
50.03 - 50.05 Hz	75 % of Reference Charges	60 % of Reference Charges
>= 50.05 Hz	50 % of Reference Charges	Zero
	Buyer	Buyer
	Receivable by way of Under Injection	Receivable by way of Under Injection
50.03 - 50.05 Hz	50 % of Normal Charges	50 % of Normal Charges
>= 50.05 Hz	0	0
	Paid by way of Over Injection	Paid by way of Over Injection
50.03 - 50.05 Hz	75 % of Normal Charges	60 % of Normal Charges
>= 50.05 Hz	0	0

5) Clause no. 8.1.5. (Scheduling And Despatch):

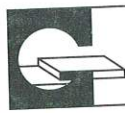
In case it is observed that a "Seller" has scheduled excess power than the approved quantum of open access in any time block; then no deviation charge shall be receivable by him for excess injection, done on that day and he will have to pay the transmission/wheeling charges as applicable for the excess schedule quantum, for the whole day, at the rate of two times of the transmission charges as applicable. In the case of implemented schedules indicated by the WRLDC/Power Exchanges/NLDC/SLDC for open access transactions, the rounding off of 0.01 MWh whether on plus side or minus side shall be ignored and such a case shall not be considered either as excess scheduling or under injection.

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Our Suggestion: - If the seller scheduled excess quantum than the approved quantum then upto 12% deviation charges should be receivable in way of excess injection. The transmission/wheeling charges as applicable for the excess schedule quantum, for the whole day, at the rate shall not be two times of the transmission charges as applicable It should be as per actual.

I shall be grateful if you would kindly consider our Comment/Suggestion/Objection to incorporate the above in CSERC draft Intra-State Deviation Settlement Mechanism and Related Matter, Regulation 2024.

Thanking you

Your faithfully

For Shri Bajrang Power and Ispat Limited

(S.K. Goyal)

DIRECTOR

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