

Chhattisgarh Biomass Energy Developers Association

C/o Shanti GD Ispat & Power Pvt.Ltd.
402, Rajiv Gandhi Complex, Bal Ashram Compound
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Ph: 0771-424300

DATE: 22.03.2024

TO

THE SECRETARY

CHHATTISGARH STATE ELECTRICITY REGULATORY COMMISSION

SHANTI NAGAR, RAIPUR (CG)

SUB: ADDITIONAL WRITTEN SUBMISSIONS/OBJECTIONS/COMMENTS ON DRAFT CSERC (INTRA-STATE DEVIATION SETTLEMENT MECHANISM AND RELATED MATTERS) REGULATIONS 2024 DATED 01.03.2024

Dear Sir,

Honorable CSERC has invited objections/comments on draft CSERC (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations 2024. We have submitted our written submissions on dated 21.03.2024 & we would like to submit the additional submissions. The following are our additional submissions on the new draft regulations :-

1) Clause 7:- LIMITS ON 'NORMAL RATE OF CHARGES FOR DEVIATION ' AND 'CHARGES FOR DEVIATIONS' :

For a small capacity biomass power generators , it is not possible to operate in the extreme narrow bandwidth of frequency as proposed in the draft regulations. Whenever there will be change in frequency bandwidth beyond 49.95 Hz to 50.03 Hz, the biomass generators will have to adjust the power generation/injection into the grid accordingly. Sometimes the frequency varies beyond the range for 20 times in a day & therefore the generation will have to be matched accordingly, which is not possible for small capacity power plants. The Commercial impact of the frequency linked operation of power plant is also huge & the same can be verified from the DSM bills of biomass generators. So, the biomass generators should not be covered under any deviation charges linked with frequency like other RE generators (MSW, Hydro, WS).

2) General Submission :-

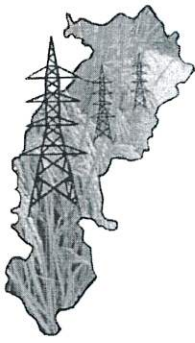
We would like to suggest that, the New DSM Regulations may be implemented for a period of two months as Mock Drills. Thereafter, the technical & commercial impact of the new Regulations on various kinds of power generating stations shall be analyzed by the honorable commission. The same methodology was adopted by the Honorable CERC before the notification of final DSM Regulations.

It is humbly prayed to consider our above submissions while finalizing the draft regulations.

Thanking You

For, Chhattisgarh Biomass Energy
Developers Association

SECRETARY



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TO

THE SECRETARY

CHHATTISGARH STATE ELECTRICITY REGULATORY COMMISSION
SHANTI NAGAR, RAIPUR (CG)

DATE: 21.03.2024

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21/03/2024

SUB: WRITTEN SUBMISSIONS/OBJECTIONS/COMMENTS ON DRAFT CSERC (INTRA-STATE DEVIATION SETTLEMENT MECHANISM AND RELATED MATTERS) REGULATIONS 2024 DATED 01.03.2024

Dear Sir,

Honorable CSERC has invited objections/comments on draft CSERC (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations 2024. We would like to thank the Honorable Commission for considering our earlier prayer of a separate category for biomass based power generating stations. The following are our submissions on the new draft regulations:-

1) Clause 6.4.5 :- "For a general seller being a generating station based on biomass"

We would like to submit that for over injection (upto 15% of Schedule or 1 MW, whichever is less) instead of reference charge rate it should be Contract rate ie. Sum of energy charge and fixed charge. The tariff of biomass generating stations are determined under section 62 or 63 of the electricity act & biomass tariff is single part tariff with two cost component ie. Fixed charge & Energy charge. As proposed in the draft, if the over injection is paid by reference charge rate ie. Energy charge only then the biomass generators are not receiving the full tariff of their injection. Therefore, the charges for over injection should be Contract Rate instead of reference charge rate.

2) Clause 8.11 :- In case of any Grid Disturbance

We would like to submit that the provision of grid disturbance should be linked with the Clause 6.8 of the Chhattisgarh State Electricity Grid Code. As per the Clause 6.8 of the Grid Code, in case of grid disturbance the actual injection shall be considered as scheduled injection for 4 time blocks including the time block in which the disturbance has occurred. Also, the honorable commission in petition no. 81/2019 of CG Biomass Association as well as in petition no. 43/2022 has decided on the same lines. But till date, the DSM charges are not being calculated based on the above said orders of the honorable Commission. Therefore, it is once again prayed that the suitable provision should be incorporated in the present draft regulations to bring operational clarity.

It is humbly prayed to consider our above submissions while finalizing the draft regulations.

Thanking You

For, Chhattisgarh Biomass Energy
Developers Association

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