



छत्तीसगढ़ स्टेट पॉवर डिस्ट्रीब्यूशन कम्पनी लिमिटेड
CHHATTISGARH STATE POWER DISTRIBUTION COMPANY LTD.
(A Government of Chhattisgarh Undertaking) (A Successor Company of CSEB)
(CIN : U40108CT2003SGC015822)

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No.02-02/RAC/ 3495

Raipur, Dt 21/03/2024

✓ The Secretary,
Chhattisgarh State Electricity Regulatory Commission,
Irrigation Colony, New Shanti Nagar,
Raipur (CG).

Sub : Comments of CSPDCL on the 2ND draft CSERC (Intra –State Deviation Settlement Mechanism and Related Matters) Regulations, 2024

Please find enclosed herewith the comments of CSPDCL on the 2ND draft CSERC (Intra –State Deviation Settlement Mechanism and Related Matters) Regulations, 2024 . It is requested to kindly incorporate the views of CSPDCL while finalizing the above said Regulations.

Enclosed – As above

EXECUTIVE DIRECTOR (RA&PM)
CSPDCL : Raipur

Sub: Comments of CSPDCL on the 2ND draft CSERC (Intra –State Deviation Settlement Mechanism and Related Matters) Regulations, 2024

Comments on the 2ND draft CSERC (Intra –State Deviation Settlement Mechanism and Related Matters) Regulations, 2024 are as under:-

SrNo	Clause No	Comments
1	3.34. “Open access customer” means a consumer permitted to receive supply of electricity from one or more person(s) other than the distribution licensee of his area of supply, or a generating company (including captive generating plant) or a licensee or a captive user who has availed of or intends to avail of long term open access or medium-term open access or short-term open access, as the case may be;	There is no necessity of providing the definition of “Open Access Customer” separately after providing the definitions of Single Supply Consumer (SSC) and Multi Supply Consumer (MSC) as the Open Access customer is already covered in SSC & MSC.
2	“Scheduled generation” or “Scheduled injection” for a time block or any period means the schedule of generation or injection in MW or MWh ex-bus including the schedule for Ancillary Services given by the concerned Load Despatch Centre	“Scheduled generation” and “Scheduled injection” are two separate terms and hence they should be defined separately. For calculation purpose of the Deviation Scheduled injection should be considered.
3	5.4. Applicability of Deviation Charge Component of the Intra-State ABT	It may be mentioned that the “All generators” covers State own generators as well. In the para 5.1 (a) it has been

	(c) All generators including CGP (selling directly or through electricity trader) who have contracted to supply power only to licensee or consumers located outside the State shall be governed by intra-State ABT only in respect of applicable deviation charges	mentioned that the State owned generators are covered under Intra State ABT i.e All the three components of ABT are applicable on State Owned generators, hence here it will not be correct state that "only Deviation" component will be applicable.
4	6. COMPUTATION OF DEVIATION 6.2. Computation of Deviation (1) Deviation in a time block for General Sellers shall be computed as follows: Deviation-general Seller (in MWh) = [(Actual injection in MWh) – (Scheduled generation in MWh)]. Deviation-general Seller (in %) = $100 \times \frac{[(\text{Actual injection in MWh}) - (\text{Scheduled generation in MWh})]}{[(\text{Scheduled generation in MWh})]}$. (2) Deviation in a time block for WS Sellers/QCA shall be computed as follows: Deviation-WS Seller (in MWh) = [(Actual Injection in MWh) – (Scheduled generation in MWh)]. Deviation-WS Seller (in %) = $100 \times \frac{[(\text{Actual Injection in MWh}) - (\text{Scheduled generation in MWh})]}{[(\text{Available Capacity})]}$ 6.4. Charges for Deviation- (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	For Computation of deviation , in respect of all types of generators (General seller, WS Seller or RE Seller) ,the term "Scheduled Generation" should invariably be replaced by "Scheduled Injection" whether in numerator or in the denominator. In case of WS Seller, as already mentioned ,the term "Scheduled Generation" should be replaced by "Scheduled Injection" in the numerator and in the denominator the term "Available Capacity" should be replaced by "Scheduled Injection"
5		Entire Clause 6.4 (2) is covered in the Clause 6.4 (4) . Hence clause 6.4 (2) could be deleted, there is no necessity of this clause.

	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	
6	7. LIMITS ON 'NORMAL RATE OF CHARGES FOR DEVIATIONS' AND 'CHARGES FOR DEVIATIONS' Notwithstanding anything contained in Clauses (5) and (6) of Regulation 6 of these Regulations, the provisions of Clauses (7.1) and (7.2) as stipulated below shall apply irrespective of volume limit, in respect of the General Seller other than a generating station based on municipal solid waste and in respect of the Buyer, when the system frequency (hereinafter "f") in a time block, is "below 49.95 Hz (i.e. $f < 49.95$ Hz)" or "above 50.03 Hz (i.e. $f > 50.03$ Hz).	Charges at frequency 49.95 Hz and 50.03 Hz should also be specified .
7	Clause 9. ENERGY ACCOUNTING AND SETTLEMENT Settlement of energy at drawl point in respect of a SSC 9.4. For SSC procuring power from solar, wind and wind-solar hybrid generators of capacity less than 5 MW, settlement of energy shall be as under:	It may be mentioned that the excess energy sold to Discom should be eligible for meeting RPO. As such at the end of the para 9.4 (a) following may be added – " Sell of such power shall be eligible for meeting RPO of

	a) The SSC, if has not opted for banking mechanism as specified in DRE Regulations 2019 and its subsequent amendments, if there is surplus energy available after set off with SSC consumption in the same 15 minutes time block, it shall be treated as sale to the concerned distribution licensee Rs. 1.50 per unit and shall be settled at the end of the month.	concerned distribution licensee” Mechanism for Settlement of energy in respect of SSC for power purchased from solar, wind and wind-solar hybrid generators of capacity less more than 5 MW should also specified.
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It is also to mention that at present SLDC is considering zero schedule for the period when no Open Access has been granted and accordingly calculating Deviation Charges for this period also. Hence, it is requested that in the Regulations itself it may be clarified no Deviation Charges shall be applicable for the period when no Open Access has been granted.


 Executive Director (RA & PM)
 CSPDCL : Raipur