



Dated : 20.03.2024

The Secretary
Chhattisgarh State Electricity Regulatory Commission
Shanti Nagar,
Raipur.

Sub: Comments on Draft CSERC (Intra-State Deviation Settlement Mechanism and Related Matters) Regulations, 2024.

Sir,

Our comments/suggestions on the subjected draft regulations are as under:

Clause 3.40 "Single supply Consumer" or SSC means a consumer including captive user not having a supply agreement with the distribution licensee in whose area of supply the consumer is located.....

This definition speaks about the consumer not having supply agreement with distribution licensee. A consumer to have grid connectivity must have a supply agreement with CSPDCL or in other words needs to be a consumer. For a Captive consumer, there is provision of zero Contract demand, but even to avail the same a Captive has to be a consumer. Hence, we believe that the definition needs to be amended accordingly.

Clause 5.4.d. It is not clear what will the deviation charges for plants commissioned after 27.12.2023. Rather we are of the opinion that the plants covered under DRE regulations shall be governed under those regulations only and that may be clarified in these regulations not only for applicability but for scheduling etc. also.

Clause 6.4 (1) It has been mentioned that the unscheduled power shall be paid at 50 paisa per unit. We believe that these regulations are not proper to fix power tariff. Usually this hon'ble commission fixes power tariff for both scheduled and non scheduled power vide separate orders/regulations.

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Clause 8.3 It has been stated that in case the STOA customer fails to submit schedule by D-7 days, the schedule shall be considered as '0'. However, maximum of two applications for revision of schedule per month shall be effected. Kindly clarify whether this revision can be upwards and to the quantum allowed under STOA and for the entire month.

Under proviso it has been stated that the downwards revision shall be dealt as per regulation 40(2) of CSERC open access regulations. Clause 40(2) of CSERC open access regulations deals with the applicable charges for wheeling, SLDC fees etc., for revision. It does not deal with period or quantum of revision. For example, in the Illustration provided in the draft it is mentioned that the Seller/Buyer shall ensure STOA approval issued by SLDC before D-7 days. It is not clarified what should be done if not granted by D-7 days. What should be the time limit for SLDC to dispose off the application. We believe, a time line for making the application shall be given with strict timeline for SLDC to dispose the application for STOA.

Clause 8.6 The timeline for conveying declared capacity to SLDC of 07.00 a.m. seems to be too early. The time should be at least 11 a.m. for the seller/buyer to examine and declare the capacity which will be more accurate.

Clause 8.7 deals with revision of schedule. Kindly clarify that in case of outage of generating unit, the schedule may be revised upto '0' and as soon as the generation in the unit is resumed, the seller may submit fresh schedule which should be made effective with 4th time block.

General Comments:

1. It is not clear that what should be the merit order for adjustment of energy for purpose of calculating DSM for a MSC.
2. We believe that on solar plants where banking is allowed, applicability of DSM is contradictory.
3. Since banking modality for solar plants commissioned after 27.12.2023 is not clear, it would be proper to clarify in these regulations that the solar plants shall be covered under banking regulations as clarified and we sincerely request the hon'ble Commission to finalise the modalities on priority.
4. Under the Chapter Scheduling and Despatch, the LTOA customers are obligated to submit their schedule on D-1 day whereas the STOA customers are obligated to submit the schedule on D-7 day. This to our opinion is not proper. STOA customers should be given more time to submit the schedule as many times the power is finalized before a day or two.

Hope you would find our suggestions in order and incorporate them while finalizing the regulation.

Thanking You,

For Hira Steels Limited



(Arun Poddar)

Director