

HIMACHAL PRADESH ELECTRICITY REGULATORY COMMISSION, SHIMLA

In the matter of draft amendments of the Himachal Pradesh Electricity Regulatory Commission Himachal Pradesh Electricity Grid Code (First Amendment) Regulations, 2018.

CORAM
Sh. S.K.B.S. Negi
Chairman
Sh. Bhanu Pratap Singh
Member

ORDER

The Himachal Pradesh Electricity Regulatory Commission (hereinafter referred as “the Commission”) notified the Himachal Pradesh Electricity Regulatory Commission Himachal Pradesh Electricity Grid Code, 2008, which were published in the Rajpatra, Himachal Pradesh, dated 11th May, 2008 (hereinafter called “the Principal Regulations, 2008”).

2. As required vide sub-section (3) of the Section 181 of the Act and read with Rule (3) of Electricity (Procedure of Previous Publication) Rules, 2005, the Commission invited public objections and suggestions by way of insertions in two News papers i.e. “The Tribune” and “Dainik Bhaskar” on 25th July, 2018. The full text of the draft amendment regulations was also made available on the Commission’s website: www.hperc.org.
3. The Commission, vide letter dated 26.07.2018, requested the major stakeholders, including Industries Associations, State Government, Directorate of Energy, HPSLDC, Small Hydro Power Project Associations, Open Access Users Associations and Distribution Licensee to send their objections/ suggestions as per the aforesaid public notice.
4. The following stakeholders have filed their objections/suggestions:-
 - (i) Director of Energy, Shanti Bhawan, Phase-III, Sector-VI, New Shimla-171009 (HP).

(ii) IA Hydro Energy Pvt. Ltd., D-17, Lane-I, Sector-I, New Shimla-171009 (HP).

5. Consideration of written submissions by the stakeholders and Commission's Views are as under.-

Sr. No.	Objections/Suggestions	Commission Views
A	Directorate of Energy, Shanti Bhawan, Phase-III, Sector-VI, New Shimla-171009 (HP).	
1	Clause 2 (V) (v) The " <u>State Power Grid</u> " should be replaced with " <u>State Grid</u> " in the clause as well as in the entire document.	The existing Code also incorporates the term 'State Power Grid' and we do not find it appropriate to accept the proposal. In any case, the term 'State Power Grid' provides more clarity. No reason has been advanced in support of the proposal.
2	Clause 2 (V)(x) In second row, new word " <u>Connected to</u> " should be inserted after person/agencies using and before ISTS	It will be appropriate that the term "user" should correspond to the activity of using the "system" rather than being connected. In certain cases the concerned system may not be connected to IaST but still may be using the said system. We therefore, decide to retain the provisions proposed in the draft regulations. As a matter of fact that the existing Grid Code also refers the activity of using this system only.
3	Clause 4 In second Row, new word " <u>connected to</u> " should be inserted after person/agencies using and before ISTS.	Same as item (2.) above.
4	Clause 6(VI) In 4 th row, <u>RPC</u> should be replaced with <u>SPC</u> i.e. State Power Committee instead a Regional Power Committee as the State issue need to be settled by SPC.	In such matters the coordination with RPC may be required apart from that with the concerned users. As such, it may not be appropriate to delete the term RPC. However, there is no bar for the STU to coordinate with SPC also. Accordingly, the word "RPC" shall be substituted with the word "RPC and /or SPC."
5	Clause 6 (XI) In second row, word " <u>each</u> " should be eliminated before SLDC.	The suggestion is accepted.
6	Clause 6 (XII) New words " <u>and amendment</u>	It is implied that reference to any Act shall

	<u>thereof</u> ” should be inserted after Central Electricity Authority (Grid Standard) Regulations, 2010.	be read with its amendments. As such it is not necessary to carry out the suggestion.
7	“ <u>Collective transaction</u> ” to be discussed under clause 6.5.5.	<p>The suggestion is accepted in principle. The following provisions shall be inserted in the amendment regulations:-</p> <p>1. In 7(III) of these regulations, the term “Collective Transaction” shall be added and defined as “(a) Collective Transaction” mean a set of transactions discovered in power exchange through anonymous, simultaneous competitive bidding by buyers and sellers.”</p> <p>The terms “State Entity” and “ State Sector Generating Stations (SSGS)” of proposed amendments shall be renumbered as (b) and (c) respectively in these regulations.</p> <p>2. At the end of the sub-para 6.5.5 of para 6, the following proviso shall be inserted:- “Provided that in cases where, the NRLDC schedules the collective transactions at the respective periphery of the regional entities, after prior coordination with the SLDC, the SLDC shall schedule the individual transactions for the state entities. In such cases the power exchanges shall send the detailed break up of each point of injection and each point of drawal within the State to respective SLDCs after receipt of acceptance from NLDC. Power Exchange(s) shall ensure necessary coordination with SLDCs for scheduling of the transactions”.</p>
8	<u>Clause 7(II)</u> Other Renewable Energy (RE) technology should be added.	The term “SSGS” has been adequately elaborated in para 7(III)(b) of the proposed amendment and does not require any further stipulation.
9	<u>Clause 7(III)(b)</u> Open Access Consumers to be discussed. Words in the 5 th row “ <u>are not considered as separate State Entity</u> ” should be deleted.	The clause 7(III)(b) under the proposed regulations has to be read with the definition of State Entity. Therefore, the suggestion is not accepted. However, the term of the words “Saleable Energy to the Distribution Licensee” shall be replaced with the words “Saleable Energy to the Distribution Licensee or, any other State Entity”. The clause 7(III)(b) of proposed

		regulations has been renumbered as 7(III)(c) in the final regulations.
10	<p><u>Clause 7 (V)</u> New words “respective periphery” should be inserted after day head basis in 6th row.</p>	<p>We find it appropriate to make the provision of scheduling of all State Entities at State Periphery. The lines “The algebraic summation of scheduled drawal from ISGS and from contracts through long-term access, medium-term open access arrangements shall provide the drawl schedule of each State Entity, and this shall be determined in advance on day-ahead basis” appearing in sub-para 6.4.2 of para 6.4 of draft amendments shall be substituted with following :-</p> <p>“The injection/drawal schedules of the State Entities, other than distribution licensee, shall be prepared with reference to their respective injection/drawal points in the State and shall, for the purposes like preparation of consolidated schedule for the State as whole, accounting, computation and recovery of various charges under Himachal Pradesh Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters(Regulations,2018 etc., be projected to the State periphery by loading applicable transmission and distributed losses of STU and distribution licensee, as applicable:</p> <p>Provided that in cases involving sale of energy by the generating stations directly connected to distribution system of distribution licensee to the retail consumers of distribution licensee procuring power from such generating stations through intra-state open access without involving STU system under the normal scheme of flows, the transmission losses of STU shall not be loaded to their respective injection/drawal schedules for projecting the same to the State</p>

		<p>periphery:</p> <p>Provided further that the distribution licensee shall give its net schedule w.r.to the STU periphery which shall be projected to State periphery by loading the transmission losses of STU:</p> <p>Provided further that all the charges specified in these regulations shall be levied based on the data at State periphery.”</p> <p>The definitions of terms ‘State Periphery’ or ‘HP Periphery’ and ‘STU Periphery’ used in above sub-para shall be added at 7(III)(d) and 7(III)(e) respectively.</p>
	In the 11 th row of second para, word “commissioning should be replaced with “implementation”.	The suggestion is accepted.
11	<u>Clause 9</u> SLDC to be added in the 4 th row with STU.	The suggestion is agreed in principle and the words “by the STU” shall be replaced by the words “by the STU in consultation with SLDC and concerned state entities”.
B IA Hydro Energy Pvt. Ltd., D-17, Lane-I, Sector-I, New Shimla-171009 (HP).		
1	<u>In sub-para 1.9.1 (viii)-b:</u> “Provided that the Commission may revise the duration of time block to 5 minutes, or any other duration, from the date to be notified by it from time to time.”; Objection: As per the prevailing norms in the CERC it stipulates 15 minutes time block, also as per CTU norms prescribed 15 minutes cycle. Hence, we are in opinion not to implement 5 minutes time block.	The draft amendment only provides for an enabling provision to revise the duration of time block and presently the time duration of 15 minutes has to be followed.
2	<u>In Chapter No. 4 clause no. 4.8.4:</u> “All thermal generating units of 200 MW and above, open cycle gas turbine/combined cycle generating stations having gas turbines of more than 50 MW each and all hydro units of 25 MW and above operating at or above 100% of their Maximum	The proposed amendment authorizes the SLDC to grant permission in this regard. The SLDC shall obviously take into account such issues in prudent manner while considering the request for grant of such permissions.

	<p>Continuous Rating (MCR) shall have the capability of (and shall not in any way be prevented from) instantaneously picking up to 105%, 105% and 110% of their MCR, respectively, when the Grid frequency falls suddenly. After an increase in generation as above, a generating unit may ramp minute, in case continued operation at the increased level is not sustainable. Any generating unit not complying with the above requirements shall be kept in operation (synchronized with grid) only after obtaining permission from SLDC.”;</p> <p>Objection: If it is not feasible as per the design of existing plants, then it will not be possible to implement, hence request for not to change.</p>	
3	<p><u>In chapter No. 5 clause No. 5.3.6</u></p> <p>(i) All the thermal generating units having capacity 50 MW and above and Hydro (except those upto three hours pondage) generating units having capacity 25 MW and above shall be operated under restricted Governor Mode of Operation w.e.f 01.04.2019;</p> <p>(ii) There should not be any reduction in generating in case of improvement in grid frequency below 50.05 Hz (for example, if grid frequency changes from 49.9 to 49.95 Hz, there shall not be any reduction in generation). For any fall in grid frequency, generation from the unit should increase by 5% limited to 105% of the MCR of the unit.</p> <p>Objection: It should not be implemented otherwise there will be loss of Energy by Hydro Plants, whereas it is considered as must run plants.</p>	<p>The proposed amendment is in line with the CERC provisions. This in fact allows certain grace period for implementation of the proposal. The must run status of hydro plants shall obviously be limited to the installed capacity only.</p>

4	<p><u>In Chapter No. 6 clause No. 6.4.2 (Last two lines):</u></p> <p>Every regional entity shall ensure reversal of sign of deviation from scheduled at least one after every twelve time block.</p> <p>Objection: We totally oppose this clause.</p>	<p>This is in line with the CERC provisions and the suggestion is not accepted. However, the words “Regional entity” appearing in this clause shall be replaced with the word “State Entity”.</p>
5	<p><u>In Chapter No. 6 Clause No. 6.5.19</u></p> <p>“Revision of declared capability by the ISGS and BBMB generating stations and requisition by beneficiary (i.e) during any time block shall also be permitted on intimation from RLDC. Revised schedules/declared capability in such cases shall become effective from the 4th time block, counting the time block in which the request for revision has been received in the RLDC to be the first one. SLDC shall intimate all the concerned State Entities about such modifications in the drawl/dispatch schedules and advise them to effect corresponding change in their drawl schedules.”;</p> <p>Objections: As per the prevailing norms of CERC and PGCIL the time required for revision of schedule is 6 time block. Hence, we are opposing to not to implement 4 time block.</p>	<p>The CERC regulations provide for time limit of 4th time block only and (not for 6th time block as commented). As such the provision under the draft amendment shall be retained without any changes. In fact, the proposed amendment only provides for more flexibility to the concerned users.</p>

6. The amendment regulations shall be finalized on above lines and notified accordingly.

Sd/-
Bhanu Pratap Singh)
Member

Sd/-
(S.K.B.S. Negi)
Chairman

Place: Shimla
Dated: 9th October , 2018