

CE/PP/NCE/6834

Date: 28/03/2018

To,
The Secretary,
Maharashtra Electricity Regulatory Commission,
13th Floor, Centre No.1, World Trade Centre,
Cuffe Parade, Colaba,
Mumbai - 400 005.

Sub: MSEDCL's Comments on draft MERC (Forecasting, Scheduling And Deviation Settlement For Solar And Wind Generation) Regulations, 2018.

Respected Sir,

Please find enclosed herewith MSEDCL's Comments on draft MERC (Forecasting, Scheduling And Deviation Settlement For Solar And Wind Generation) Regulations, 2018.

It is requested to put up above details before Hon'ble Commission.

Thanking you,

Encl.: as above

Regards,

Chief Engineer (Power Purchase)

Copy s. w. r. to:

The Director (Commercial), MSEDCL, Mumbai

Comments on MERC Draft (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulations, 2018

Maharashtra Electricity Regulatory Commission intends to enact MERC (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulations, 2018. Accordingly, the Hon'ble Commission has circulated the draft of the proposed MERC (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulations, 2018 and has directed to submit the comments by 30th March 2018.

MSEDCL is hereby submitting the comments on the proposed MERC (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulations, 2018. MSEDCL would like to earnestly request the Hon'ble Commission to kindly consider the said comments & also to incorporate the same in the final version of MERC (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulations, 2018 after following the due process.

Accordingly, MSEDCL would like to make humble submission to the Hon'ble Commission to consider the following comments / suggestions before MERC (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulations, 2018 is finalized.

1. "Absolute Error"

Regulation 2.1 (a) of the MERC Draft (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulations, 2018 provides for the definition of Absolute Error. The said definition is reproduced below:

"Absolute Error" means the difference between the scheduled and the actual generation injected by Solar or Wind Energy Generators in relation to their Available Capacity in each time block, and may be computed in percentage terms by applying the following formula:

$$\text{Absolute Error (\%)} = 100 \times \frac{[\text{Actual Generation} - \text{Scheduled Generation}]}{\text{AvC}}$$

[OR]

"Absolute Error" means the difference between the scheduled and the actual generation injected by Wind or Solar Energy Generators in relation to their scheduled generation in each time block, and may be computed in percentage terms by applying the following formula:

$$\text{Absolute Error (\%)} = 100 \times \frac{[\text{Actual Generation} - \text{Scheduled Generation}]}{\text{Scheduled Generation}}$$

MSEDCL Submission

MSEDCL submits that the computation of Absolute Error should be with Scheduled Generation as denominator as typically deviations are calculated with respect to the Scheduled Generation. It is further highlighted that the deviations in case of thermal generation is with respect to the scheduled generation only.

MSEDCL Suggestion

MSEDCL requests the Hon'ble Commission to adopt thesecond option for computation of absolute error for maintaining better Grid discipline and for the sake of maintaining uniformity. It is submitted that the Scheduled Generation values are accessible to all the concerned utilities and shall also be under SLDC monitoring, while the "Available Capacity" (or "AvC") values of Wind or Solar Generators is not accessible to any utility or SLDC and can lead to mis-declaration of available capacity. It is therefore requested to adopt the definition of Absolute Errorwith Schedule Generation as denominator as given in the Draft Regulationwhich is reproduced below:

"Absolute Error" means the difference between the scheduled and the actual generation injected by Wind or Solar Energy Generators in relation to their scheduled generation in each time block, and may be computed in percentage terms by applying the following formula:

$$\text{Absolute Error (\%)} = 100 \times \frac{[\text{Actual Generation} - \text{Scheduled Generation}]}{\text{Scheduled Generation}}$$

2. Available Capacity

Clause 2.1 (e) of the Draft MERC Regulation provides for the definition of Available Capacity. The said definition is reproduced below:

"Available Capacity" (or "AvC") of Wind or Solar Energy Generators means the cumulative capacity rating of the Wind turbines, Solar inverters or Solar thermal generators that are capable of generating power in a given time block;

MSEDCL Submission

MSEDCL submits that derating of solar or wind projects occur due to ageing of Plants and this factor should be incorporated and considered while determining the Available Capacity of the projects.

3. Applicability – Type of substation

Clause 4.1 of Draft MERC Regulation 2018 state the applicability of the proposed regulation. The same has been reproduced below:

These Regulations shall apply to all Wind and Solar Energy Generators in Maharashtra connected to the Intra-State Transmission System, including those connected through Pooling Sub-Stations, and using the power generated for self-consumption or sale within or outside the State:

Provided that the combined installed capacity of the Solar or Wind Generators connected to a particular Pooling Sub-Station, or that of an individual Generator connected to some other Sub-Station, shall not be less than 5 MW.

MSEDCL Submission

MSEDCL submits that the current Draft Regulations are applicable to generators connected to the Intra – State Transmission System including those connected to the Pooling Sub- Stations. However by excluding RE generator or a group of generators which are connected to the Intra – State Distribution System from the ambit of this regulation, it is feared that the very purpose of this regulation is being defeated. It is pertinent to mention here that a significant number of Solar & Wind Generators with installed capacity less than 5MW are connected directly to Intra – State Transmission System and Intra – State Distribution System. Such Generators will fall out of this MERC Draft (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulation, 2018.

MSEDCL further submits that as the Govt. of Maharashtra GoMvide G.R. dated 14.06.2017 declared the “Mukhyamatri Solar Agricultural feeder Scheme” policy for the state for energizing separated Agriculture (AG) Feeder by implementing Solar Projects. Therefore MSEDCL requests the Hon’ble Commission to make these regulations applicable to all generators as after implementation of the above mentioned scheme, solar projects as small as 0.5 MW shall be connected to the state grid& Distribution system.

MSEDCL Suggestion

These Regulations shall apply to all Wind and Solar Energy Generators in Maharashtra connected to the Intra-State Transmission System, Intra State Distribution System, including those connected through Pooling Sub-Stations, and using the power

generated for self-consumption or sale within or outside the State.

4. Applicability – Generation Capacity connected to the substation

Clause 4.1 of Draft MERC Regulation 2018 state the applicability of the proposed regulation. The same has been reproduced below:

These Regulations shall apply to all Wind and Solar Energy Generators in Maharashtra connected to the Intra-State Transmission System, including those connected through Pooling Sub-Stations, and using the power generated for self-consumption or sale within or outside the State:

Provided that the combined installed capacity of the Solar or Wind Generators connected to a particular Pooling Sub-Station, or that of an individual Generator connected to some other Sub-Station, shall not be less than 5 MW.

MSEDCL Submission

MSEDCL submits that the current Draft Regulations provide that the combined installed capacity of the Solar or Wind Generators connected to a particular Pooling Sub-Station, or that of an individual Generator connected to some other Sub-Station, shall not be less than 5 MW. However by excluding RE generator or a group of generators of less than 5 MW connected to a pooling substation or some other substation from the ambit of this regulation, it is feared that the very purpose of this regulation is being defeated. It is pertinent to mention here that a significant number of Solar & Wind Generators with installed capacity less than 5MW are connected directly to ISTS. Such Generators will fall out of this MERC Draft (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulation, 2018.

It is further submitted that a closer look at the historical RLMM list issued by NIWE, suggest that the currently installed individual wind mill capacities are much lower than 5 MW. Hence standalone wind generators who are not a part of the pooling substation will have installed capacity less than 5MW and such generators will fall out of the proposed draft Regulations.

MSEDCL Suggestion

MSEDCL requests the Hon'ble Commission that all the RE Generators be brought under the ambit of this regulation in line to proposed regulations in RE-rich states such as Gujarat and Tamil Nadu.

5. Technical Arrangements - Appointment of QCA

Clause 5 & 6 - Forecasting and Scheduling Code of the Draft MERC Regulation provide for the appointment of a QCA by the generator or a group of generators.

MSEDCL Submission

MSEDCL would like to submit that QCAs should have an established team of Renewable energy analysts, statisticians, Software developers and a monitoring team to achieve the objective of the Regulations so as to reduce the deviation and thus safeguarding the Grid, the qualification of QCA should be defined. Also, the QCA should be a company incorporated in India under the Companies Act, 1956/2013.

It is further submitted that “technical and financial competence” needs to be clearly defined in the regulations.

MSEDCL further submits that Bank Guarantees and sufficient payment security mechanisms should be in place between QCA and the Generators to mitigate the financial implications arising on account of party’s default.

6. Technical Arrangements (Forecasting & Scheduling Code) – Breach of Regulations

Clause 5.23 (a) of the Draft MERC Regulation provides for the event of breach of regulations by the QCA or the Generator. The said regulation is reproduced as below:

(a) Any intentional mis-declaration of Available Capacity to the SLDC for its own undue commercial gain or that of a Generator shall constitute a breach of these Regulations.

(b) The QCA shall be liable to pay a penalty of three times the Deviation Charges that would have been applicable had the Available Capacity been correctly declared.

(c) The amount of penalty shall be payable by the QCA to the State Deviation Settlement Mechanism (DSM) Pool, through the SLDC.

(d) The SLDC may, after giving due notice and as stipulated in the Detailed Procedure, cancel the registration of the QCA upon repeated events of mis-declaration.

MSEDCL Submission

MSEDCL submits that clarity is required on ‘upon repeated events’ mentioned in draft Regulations. A particular number of attempts should be defined, beyond which the QCA shall be disqualified.

It is further submitted that the regulations should address the scheduling and de-pooling issues arising post-disqualification of QCA (till selection of new QCA).

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7. Implementation Arrangements

In Part D of the Draft MERC Regulation, Metering & Energy Accounting and Communication between QCA and SLDC has been detailed. The Draft Regulation states that every Pooling Station and stand-alone Generator with installed capacity of 5 MW or above shall have a Special Energy Meter (SEM).

MSEDCL Submission

MSEDCL submits that the applicability of the ibid Regulations has been questioned in the above comments. It is requested that the Metering clause be revised in line with the Applicability clause to include all projects under the ambit of the regulations instead of projects above 5 MW only. It is further submitted that the regulations should address the situation wherein the Generator has failed to install SEM within the stipulated timelines. Also the regulations should provide for installation of backup meter i.e. ‘check meter’.

Also, with different QCAs adopting different software/portals shall lead to operational burdening of SLDC. Hence a Common Software should be developed / adopted by all the QCAs and therefore it is requested to provide clarity on the same in the final regulations.

8. Deviation Settlement for Intra-State Transactions (If Absolute Error %age is computed with Scheduled Generation as the denominator)

Clause 7 of the Draft Regulations provide for Deviation Settlement for Intra – State transactions. The deviation charges payable by the QCA on behalf of the generator has been tabulated below:

Deviation Charge for under- or over-injection, for sale or self-consumption of power within Maharashtra

[If the Absolute Error %age is computed with Scheduled Generation as the denominator]

S. No.	Absolute Error in %age terms in 15-minute time block	Deviation Charge payable to State DSM Pool	
1	<= 30%		INR 0.00/kWh
2	> 30% but <= 40%	Beyond 30% and up to 40%	INR 0.50/kWh
3	> 40% but <= 50%	Beyond 30% and up to 40%	INR 0.50/kWh
		Beyond 40% and up to 50%	INR 1.00/kWh
4	> 50%	Beyond 30% and up to 40%	INR 0.50/kWh
		Beyond 40% and up to 50%	INR 1.00/kWh

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S. No.	Absolute Error in %age terms in 15-minute time block	Deviation Charge payable to State DSM Pool	
			Above 50%

MSEDCL Submission

MSEDCL submits that the Deviation Charges of Solar and Wind Power should be different as the variable nature of the two sources of power is different and also solar forecasting methodologies are quickly maturing worldwide and have higher accuracy levels than wind forecasting. It is further submitted that on account of different generation schedules and seasonality factors of solar and wind power, the deviation charges for the two generations should be different.

MSEDCL further submits that if in case MERC adopts Scheduled Generation as denominator in computation of Absolute Error, then the following Table for calculation of deviation charges be adopted for Solar and Wind power:

Deviation Charge for under- or over-injection, for sale or self-consumption of Solar power within Maharashtra

[If the Absolute Error %age is computed with Scheduled Generation as the denominator]

S. No.	Absolute Error in %age terms in 15-minute time block	Deviation Charge payable to State DSM Pool	
		1	<= 10%
2	> 10% but <= 20%	Beyond 10% and up to 20%	INR 0.50/kWh
3	> 20% but <= 30%	Beyond 10% and up to 20%	INR 0.50/kWh
		Beyond 20% and up to 30%	INR 1.00/kWh
4	> 30%	Beyond 10% and up to 20%	INR 0.50/kWh
		Beyond 20% and up to 30%	INR 1.00/kWh
		Above 30%	INR 1.50/kWh

Deviation Charge for under- or over-injection, for sale or self-consumption of Wind power within Maharashtra

[If the Absolute Error %age is computed with Scheduled Generation as the denominator]

S. No.	Absolute Error in %age terms in 15-minute time block	Deviation Charge payable to State DSM Pool	
		1	<= 15%
2	> 15% but <= 25%	Beyond 15% and up to 25%	INR 0.50/kWh
3	> 25% but <= 35%	Beyond 15% and up to 25%	INR 0.50/kWh
		Beyond 25% and up to 35%	INR 1.00/kWh

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S. No.	Absolute Error in %age terms in 15-minute time block	Deviation Charge payable to State DSM Pool	
		4	> 35%
		Beyond 25% and up to 35%	INR 1.00/kWh
		Above 35%	INR 1.50/kWh

9. Deviation Settlement for Intra-State Transactions (If Absolute Error %age is computed with Available Capacity as the denominator)

Clause 7 of the Draft Regulations provide for Deviation Settlement for Intra – State transactions. The deviation charges payable by the QCA on behalf of the generator has been tabulated below:

Deviation Charge for under- or over-injection, for sale or self-consumption of power within Maharashtra

[If the Absolute Error %age is computed with Available Capacity as the denominator]

S. No.	Absolute Error in %age terms in 15-minute time block	Deviation Charge payable to State DSM Pool	
		1	<= 10%
2	> 10% but <= 20%	Beyond 10% and up to 20%	INR 0.50/kWh
3	> 20% but <= 30%	Beyond 10% and up to 20%	INR 0.50/kWh
		Beyond 20% and up to 30%	INR 1.00/kWh
4	> 30%	Beyond 10% and up to 20%	INR 0.50/kWh
		Beyond 20% and up to 30%	INR 1.00/kWh
		Above 30%	INR 1.50/kWh

MSEDCL Submission

MSEDCL submits that the Deviation Charges of Solar and Wind Power should be different on account of different generation schedules and seasonality factors of the two sources of power.

Further, MSEDCL is of the view that the Absolute Error should be computed with Scheduled Generation as the denominator. However if the Hon’ble Commission adopts Available Capacity as denominator in computation of Absolute Error, then the following table for calculation of deviation charges be adopted for Solar and Wind power:

Deviation Charge for under- or over-injection, for sale or self-consumption of Solarpower within Maharashtra

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[If the Absolute Error %age is computed with Available Capacity as the denominator]

S. No.	Absolute Error in %age terms in 15-minute time block	Deviation Charge payable to State DSM Pool	
1	<= 5%		INR 0.00/kWh
2	>5% but <= 15%	Beyond 5% and up to 15%	INR 0.60/kWh
3	>15% but <= 25%	Beyond 5% and up to 15%	INR 0.60/kWh
		Beyond 15% and up to 25%	INR 1.20/kWh
4	> 25%	Beyond 5% and up to 15%	INR 0.60/kWh
		Beyond 15% and up to 25%	INR 1.20/kWh
		Above 25%	INR 1.80/kWh

Deviation Charge for under- or over-injection, for sale or self-consumption of Wind power within Maharashtra

[If the Absolute Error %age is computed with Available Capacity as the denominator]

S. No.	Absolute Error in %age terms in 15-minute time block	Deviation Charge payable to State DSM Pool	
1	<= 8%		INR 0.00/kWh
2	> 8% but <= 16%	Beyond 8% and up to 16%	INR 0.35/kWh
3	> 16% but <= 24%	Beyond 8% and up to 16%	INR 0.35/kWh
		Beyond 16% and up to 24%	INR 0.70/kWh
4	> 24%	Beyond 8% and up to 16%	INR 0.35/kWh
		Beyond 16% and up to 24%	INR 0.70/kWh
		Above 24%	INR 1.05/kWh

10. All costs associated with implementation of this regulation to be borne by Generators

MSEDCL Submission

MSEDCL submits to the Hon'ble Commission that any cost incurred on account of implementation the ibid regulations should be borne by the Generator. The same shall not be passed on to the DISCOM and subsequently the consumers by means of any change in law or regulation as the objective of the proposed Regulations is to bring into control the deviations in Grid arising on account of energy injected by Wind and Solar Generators.

11. Reduction in Absolute Error / Tightening of Error Band

MSEDCL Submission

MSEDCL submits to the Hon'ble Commission that after gaining experience in forecasting and scheduling, the error band needs to be tightened in phased manner after initial period of implementation of about three years so as to bring in better grid discipline and greater accuracy.

MSEDCL Suggestion:

MSEDCL requests the Hon'ble Commission to include the following provision in the Regulations:

After the experience of three years from the effective date of notification of regulation, the absolute error for solar and wind energy generators shall be reduced by 1% (one percent) every year from the first date of start of the fourth year of theregulations for subsequent 5 years so that Minimum absolute error and maximum permissible absolute error shall be reduced by 5% each at the first date of 8th (Eighth year) of the final regulations come in force.

12. Default by Generator in payment to QCA

MSEDCL Submission

It is submitted to the Hon'ble Commission that suitable provisions should be included in the Regulation for the event of default in payments by the solar or wind generators to the QCA along with appropriate penalties.

MSEDCL Suggestion:

MSEDCL requests the Hon'ble Commission to include the following provision in the Regulations:

In case the wind or solar generator defaults in payment to QCA then QCA shall inform about the default by the generator to the SLDC and to disconnect such defaulting generator from the grid.

Payment of all charges on account of Deviations beyond the permissible limit at a Pooling Station by Wind and Solar generators shall have priority over other payments and shall be paid within 10 (ten) days from the issuance of the accounts. In case of default of payment exceeding more than 2 days that is 12 days then an interest of 0.04% per day for each day of delay shall be levied.

13. Revision in existing Intra – State ABT Mechanism

MSEDCL Submission

MSEDCL submits to the Hon'ble Commission that these regulations should be read along with 'Intra-state ABT mechanism', in which the state generators are not a part of the SPP (State pool participants). The current Draft Regulation brings wind & solar generators under the umbrella of Deviation settlement Mechanism under this proposed regulation. However, all other type of generators fall out of the deviation settlement mechanism, thus causing irregularity in applicability of DSM regulations. Hence both the regulations needs to be revised accordingly to maintain uniformity in both the regulations

14. Treatment of funds in the State Deviation Settlement Pool collected by MSLDC as Deviation Charges & Penalty from the QCA's

MSEDCL Submission

MSEDCL submits to the Hon'ble Commission that the said regulations should provide greater clarity on the treatment / utilization of the fund created in the State Deviation Settlement Pool collected by MSLDC as Deviation Charges / Penalties from the QCA's on behalf of the Generators.

MSEDCL Suggestion

MSEDCL requests the Hon'ble Commission to make available suitable provisions in the

said regulations for distribution of Deviation Charges & Penalties collected from the QCA's among all Procurer's in proportion to their contracted capacities.

15. Compensation to Procurer's towards UI Charges for deviations by the Generators

MSEDCL Submission

MSEDCL submits to the Hon'ble Commission that the said regulations currently do not provide for any mechanism for compensation to Procurer's for the deviations by the Generators.

MSEDCL Suggestion

MSEDCL requests the Hon'ble Commission to make available provisions in the said regulations for a mechanism to suitably compensate the Procurer's as the latter shall be liable to pay Unscheduled Interchange (UI) Charges for the deviations by the Generators.

16. Schedule Revision – Solar Power

Clause 5.19(c) of the Draft MERC Regulation provide for Weekly and Day-ahead scheduling with maximum 16 revisions during a day. The relevant clause from the Draft Regulation has been reproduced below:

(c) There may be one revision for each time slot of one and half hours starting from 00.00 hours of a particular day, subject to a maximum of 16 revisions during the day.

MSEDCL Submission

MSEDCL submits that the restriction limit on the number of scheduling revisions in case of Solar power should be separately proposed as typically solar power generation is available only for approx. 9 hours in a day.

17. Banking of Power

MSEDCL Submission

MSEDCL submits to the Hon'ble Commission that the proposed Regulations do not specify anything about RE power banking. However, if energy banking does exist, the Wind/Solar generators through the QCAs are expected to provide block-wise banked energy withdrawal schedule and allocation to its captive users on weekly basis.

18. SLDC to provide QCA wise data of all generators

MSEDCL Submission

MSEDCL submits that in the case of curtailment of power at the pooling substation, a Procedure or Protocol needs to be framed that the QCA shall follow. Such a Procedure/Protocol is necessary to avoid any abuse of power by the QCA so that no generator is unduly forced to curtail its generation.

19. Details of Communication of Scheduling and Rescheduling

MSEDCL Suggestion

MSEDCL requests the Hon'ble Commission to make provision in the Regulation that makes available to the Discom real time details of communication between the QCA and the SLDC regarding Scheduling and any Revision in Scheduling of power, on the website of SLDC. Also, a monthly statement for the same should be prepared by the SLDC and to be shared with the Discom.

20. Special Energy Meter data to be available

MSEDCL Suggestion

MSEDCL requests MERC to make provision in the Regulation that makes available to the Discom, the Special Energy Meter data in a readable format on the SLDC website.

21. Monthly Energy Accounting Statement of all QCAs

MSEDCL Suggestion

It is requested to the Hon'ble Commission that the Regulation should provide for preparation of monthly energy accounting statement of all QCAs by the SLDC and it should be available on its website.

22. SLDC to provide QCA wise data of all Generators.

MSEDCL Suggestion

MSEDCL submits that the SLDC shall make available to the Discom, the QCA wise forecasted and actual injection of all generators.

23. Non – submission of Forecast & Schedule by QCA to the SLDC due to technical / communication network failure

MSEDCL Suggestion

MSEDCL submits to the Hon'ble Commission that in the event a QCA fails to submit the forecast & schedule to the SLDC due to any technical / communication network problem, then the SLDC should have the authority to utilize the previous day implemented schedule.

24. Impact on grid stability due to over – injection in case of an inter- state transaction

MSEDCL Submission

MSEDCL submits to the Hon'ble Commission that in case a generator connected to the grid having an inter – state power sale contract for a quantum lesser than its installed capacity, over injects into the grid, then it shall get paid for such over-injection as per CERC DSM Regulations 2014. However, since it is connected to the state grid, it will affect the overall grid stability due to deviation from its schedule and hence leading to curtailment of generation by some generator(s) having an intra – state power sale contract. It is therefore requested to make certain provisions in the said regulation to avoid such scenarios and possible misuse.

25. Provision for Force Majeure Events

MSEDCL Suggestion

MSEDCL requests the Hon'ble Commission to make relevant provisions in the Regulation for cases of deviation in scheduling of power or no scheduling of power due to Force Majeure events. It is important to clearly define procedures for such cases to avoid any disputes in the future.

26. Procedure in case of Event of Default.

MSEDCL Suggestion

MSEDCL requests the Hon'ble Commission to define procedures in the Regulation for the following to avoid any disputes:

- i. In case of Default by the Generator or Generators.
- ii. In case of Default by the QCA.
- iii. In case of any dispute between the QCA and the Generator.

27. Event of Suspension or Cancellation of QCA's license.

MSEDCL Suggestion

It is requested to the Hon'ble Commission to define a clear procedure in the Regulation from the event of suspension or cancellation of the license of the QCA for breaching the regulations on multiple occasions till the appointment of a new QCA.

28. Event of Dispute between the QCA and a Generator

MSEDCL Suggestion

MSEDCL requests the Hon'ble Commission to make provisions in the Regulation to appoint a new QCA for the generators connected on the same feeder in the event of a dispute between the QCA and a generator.

29. Metering arrangement

Clause 5.10 of MERC Draft Regulations 2018 states that

Meters shall be installed for energy accounting in accordance with the relevant provisions of the Central Electricity Authority (CEA) Regulations governing metering, along with telemetry /communication and Data Acquisition Systems for the transfer of information to the SLDC by the QCA.

MSEDCL Suggestion

MSEDCL requests the Hon'ble Commission to make provisions in the Regulation for installation of ABT meter and AMR arrangement at all RE feeders emanating from STU pooling stations as feeder wise injection data at the pooling substations shall be required for deviation settlement.

30. Availability of Week Ahead Schedule to the Discom

Clause 5.17 of MERC Draft regulations 2018 states that the QCA shall provide to the SLDC a Day-Ahead and a Week-Ahead Schedule for each Pooling Sub-Station or each stand-alone Generating Station, as the case may be, to enable it to assess the Availability of energy and the margin available in the State Grid.

MSEDCL Suggestion

MSEDCL requests the Hon'ble Commission that the QCA shall provide the Week Ahead

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Schedule to the Discoms so that the latter can plan their weekly power procurement accordingly as the variations in RE power schedule and procurement of power critically affects the Discoms.

MSEDCL requests the Hon'ble Commission to kindly consider MSEDCL's comments / suggestions on the MERC Draft (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulations, 2018.