

Ref. No.MSEDCL/Comments/DSM/ 27572

Date: 22.11.2018

To,
The Secretary,
Maharashtra Electricity Regulatory Commission,
13thFloor, center No.1 ,World Trade Centre,
Cuffe parade, Colaba
Mumbai- 400 005.

Sub: Submission of comments / suggestions / objections on draft MERC (Deviation Settlement Mechanism and related matters) Regulations, 2018

Ref: Public notice by MERC for Draft MERC DSM Regulation 2018

Respected Sir,

This is in reference to public notice issued by Hon'ble MERC on draft MERC (Deviation Settlement Mechanism and related matters) Regulations, 2018. MSEDCL is hereby submitting the comments on the proposed draft Discussion Paper which is attached herewith.

Some of important comments on MERC (Deviation &Settlement Mechanism) 2018 is as under:

- 1. Early implementation of new DSM regulation :** MSEDCL has already incurred a loss of more than Rs.4000 Crs & petition for the same has been filed by MSEDCL. Any delay in implementation of new deviation settlement mechanism will further increase loss to MSEDCL & thereby unnecessary financial burden on the consumers of MSEDCL. Hence it is suggested to keep the commencement date of all the regulations at the same time instead of implementation of the regulation in phases. Possible hurdle in implementing proposed regulation are
 - **Installation of interface points:** Presently only 47 interface point locations needs to be metered by MSETCL & can be metered within next 3 month.
 - **Meter Data collection:** Till implementation of AMR, reading can be taken through MRI on weekly basis.

- **Software for scheduling & accounting purpose:** Presently software for this purpose is already available in market & can be customised to suit our needs. Further MSEDCL is also ready to extend support of our IT department to SLDC for same.

Hence MSEDCL further humbly submit that if immediate implementation of new DSM is not possible then MERC should devise a methodology to compensate MSEDCL's consumer for the losses incurred due to FBSM till revise DSM is implemented.

2. **Inclusion of buyer in definition of gaming** to avoid taking undue advantage like sell in market or to avoid purchase by declaring demand on lower side to create surplus and in real time operation, intentional overdrawal from grid.
3. **Need of mandatory provision for maintaining reserve by each DISCOM** :At present, as against peak demand of 3600MW of Mumbai DISCOM , firm power tieup under Long term from conventional source is only 2420MW (67% of peak demand) & RE power tie up is 387. Hence more than 30 % power is purchased from short term & at present there is no reserve to meet contingency. This lack of firm PPAs of Mumbai DISCOMs gives them opportunity to use power contracted by MSEDCL as unscheduled drawal. This can be seen from FBSM bills issued by MSLDC from 2011-12 to Nov -2016 & from DSR reports of MSLDC , each year Mumbai DISCOM have been overdrawing power from Grid.

UI Energy as per FSBM bills of MSLDC (in MUS)				
FY	TPC-D	R-Infra	BEST	Total
FY2011-12	+398	-337	-402	-341
FY2012-13	+817	-608	-370	-160
FY2013-14	+811	-185	+373	+999
FY2014-15	+431	+38	+399	+868
FY2015-16	+555	+727	+322	+1604
FY2016-17 (Till Nov-2016)	+346	+606	-31	+921
Total as on Nov-2016	+3358	+240	+293	+3890

UI Energy as per DSR report of MSLDC (in MUS)	
FY2016-17 (Dec-16 to Mar-17)	+401
FY2017-18	+1664
FY2018-19 (Oct-18)	+773

(Note : + ve sign indicate overdrawal energy from grid)

Hence these DISCOM should be mandated to have atleast 90% power on LTA and any unscheduled withdrawal from intrastate grid should be at price higher than prevailing market price in exchange. Infact, CERC also with view to deter

DISCOM to use grid as market by overdrawing, have proposed to link DSM vector rate with market clearing price.

Further in view of high penetration of RE generation in future, the tertiary reserve will be needed as balancing mechanism. Hence looking into future power scenario, Hon'ble commission is requested to make suitable provision in regulation thereby mandating DISCOM to tieup with Hydro, battery storage, gas station or any such fast responding tertiary reserve to meet its exigency. The DISCOM wise quantum shall also be fixed for such mandatory reserve.

4. Commercial arrangement for decision taken by SLDC to meet exigency situation

:MSLDC is using Koyna as well as other hydro station contracted with MSEDCL, not only to control overdrawal of Mumbai DISCOM but also to meet demand of Mumbai. Further irrespective of overdrawal of any DISCOM or under injection by seller, RLDC schedule costly RLNG power or URS power (almost Rs.8 per kwh) to MSEDCL wherever state is on overdrawal which may be because of other utilities. MSEDCL has already incurred loss on account of such incidence & In future, if such incidence continues, the DSM rate may not offset the loss face by MSEDCL. Hence MSEDCL submits that Koyna should not be used as a balancing mechanism. More so when entire Koyna is calculated as ARR of MSEDCL. Also, the Hydro of TATA power is not used for balancing power. If Hydro of MSEDCL is to be used for balancing the grid then Hydro of all other licensees should be used. However in case of exigency if koyna is used by MSLDC, it should be used only with prior permission from MSEDCL to control overdrawal or to meet demand of DISCOM other than MSEDCL then commercial mechanism should be such that it will deter other DISCOM to use Koyna to control its overdrawal. The proposed commercial arrangement should be as under :

- Rate of Koyna Hydro used to meet demand of other than MSEDCL shall be equivalent to highest variable cost in MOD. Presently Highest variable cost station is Kawas RLNG which is Rs.7.64 per unit
- In case schedule of costly power to MSEDCL by RLDC, MSEDCL should be compensated by recovering both fix & variable cost of that station from overdrawing DISCOM at that time

- 5. Applicability** : All intrastate generator irrespective of installed capacity & level of connectivity(i.e Transmission or distribution) shall be included in this proposed regulation. The DSM charges are applicable for generating station as a whole & not individual unit in that respective station. This will help in reducing generator

deviation. Partial open access consumer with more than 50% contract demand from RE source or contract demand of more than 5MW (whichever is highest) shall be also part of present deviation settlement mechanism. In respect of balance, partial open access consumers, existing MERC (Transmission/Distribution Open access regulation shall be amended and any deviation of RE generator shall be borne by concerned partial OA consumer as a temporary tariff Units & rate of temporary tariff units shall be increase

6. Applicability of this Regulations to Deemed Licensee such as Railways, SEZ, etc

- As per the draft Regulations, the Buyer is defined as below:

d. 'Buyer' means a person, including distribution licensee or open access consumer, purchasing electricity through a transaction scheduled in accordance with the regulations applicable for short-term open access, medium-term open access and long-term access;

- It is submitted that as the definition includes the distribution licensee, all the distribution licensee which includes Deemed distribution licensee, SEZ, Railway, Distribution Licensee as per Section 13 and 14 also gets included.

7. Consent for availing URS power :The SLDC must schedule URS to DISCOM requesting only after written consent from DISCOM whose URS power will be availed. The rationale behind same is as under :

- It will hamper power planning strategy of buyer/DISCOM like to purchase from market to save coal of intrastate generator & keep its schedule at tech minimum. If URS is allocated without consent of original buyer, then such power planning strategy will defeated.
- It is most likely possibility that other DISCOM instead of purchasing from Market on day ahead basis will rely on MSEDCL' surplus power to meet its demand and if MSEDCL in real time recall its surrender power, then these DISCOM will automatically overdraw from grid.

Further in case availing URS power as per CERC regulation is concerned, beneficiary cannot availed URS power from particular station unless that beneficiary also has some share in that particular station. For example, MSEDCL can avail URS of ISGS stations in which it has share allocated by Ministry of power. In other word, MSEDCL can schedule USR only with long term contracted ISGS station. Hence it is suggested that for scheduling of URS, there must be atleast some agreement within DISCOM for sharing of URS power. The

commercial arrangement as suggested in attached detailed comments needs to be adopted in case scheduling of URS power.

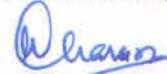
8. **Change in sign of the deviation** :Deviation can be easily controllable by Generator and therefore for Seller, the deviation for change in sign can be allowed for a shorter duration like six time blocks or lower.
9. **Wrong DSM on account of SCADA data Issue** : As per clause 7.7(i) of CERC communication regulation , STU is responsible for planning and coordination for development of reliable backbone communication for data communication within a State and STU is owner of central sector drawal points. As per clause 7.7(i) of CERC communication regulation, owner of communication system shall maintain the channel availability up to 99.9%". It is proposed that if State doesn't violate limit of deviation but on account of SCADA problem, if State is being liable for any UI charges as per SEM Data, the said charges to be recovered from default entity i.e. STU as SCADA data visibility is responsibility of the STU.
10. **Deviation volume limit for MSEDCL** : On account of RE rich state (>3000MW), CERC has allocated additional 100MW to Maharashtra & being major portion of RE is contracted with MSEDCL, this additional 100MW shall be allocated to MSEDCL only. Mumbai DISCOM's tie up RE generation capacity is much less than 3000MW; in fact only about 700MW. Hence Maharashtra would not have got any additional margin on account of RE generation contracted capacity of Mumbai DISCOM. Whereas MSEDCL tied up RE generation capacity only from Wind, Solar is more than 4800 MW & will increase further in future exponentially. Hence it is submitted that additional 100MW deviation limit allocated by CERC to Maharashtra shall be exclusively allocated to MSEDCL & deviation limit of all buyers (including MSEDCL) than shall be computed with State Volume Limit as 150MW in proportionate of recorded NCPD. Further allocation of additional deviation limit (i.e 100MW above 250MW) above individual computed deviation limit shall also be based on recorded NCPD
11. **Treatment for deviation of infirm power** :The permission for injecting infirm power shall be given as far as possible during peak demand period i.e during day time. The infirm power injected into grid by generator prior to COD, will affect unscheduled interchange of state. Presently Infirm power is injected into the grid on prior permission of MLSDC with zero paisa by the generator. Hence it is proposed that irrespective of type of fuel, cap for deviation charges of infirm power injected shall be the lowest variable charges in respective month MOD

- stack. Further in case of power drawn from grid prior to COD, no exemption shall be given and DSM charges shall be applicable. The concerned generator can avail power from DISCOM.
12. **Scheduling** : Instead of centralised MOD in real time, there should be centralized operation of decentralised MOD of each DISCOM by SLDC. This is necessary because, centralised MOD will create commercial complication in settlement of deviation. Further if centralized MOD is operated, then present practices by other DISCOM will continues that rely on MSEDCL power for meet its demand.
13. **Discrimination to Generator for DSM rate**: Generator whose tariff is determined by commissionshould not be given any discriminatory treatment than DISCOM by providing DSM cap rate for deviation charges. Moreover commission has not mentioned any specific reason for providing cap DSM rate only in respect of generator in SOR.

MSEDCL requests the Hon'ble Commission to kindly consider MSEDCL's comments / suggestions on MERC (Deviation Settlement Mechanism and related matters) Regulations, 2018.

With Regards

Yours faithfully



(Satish Chavan)

Director (Commercial)

Encl: MSEDCL's comments (Total 43 pages)

Copy s.w.r.to:

The Chairman & Managing Director, MSEDCL, Corporate office Mumbai.

MSEDCL's comments on Draft MERC(Deviation settlement Mechanism and related matters) Regulation, 2018

clause	Provision	Comments																																																						
1(2)	<p>Regulation 1 - Short Title and Commencement</p> <p><i>(2) These Regulations except commercial arrangements, Deviation Charges, Additional Charges for Deviation and penal action shall come into force on the date of notification in these Regulations in the official Gazette.</i></p> <p><i>Provided that the commercial arrangement shall come into force from date to be notified separately through Order, which shall not be later than 1 April 2020.</i></p> <p><i>Provided further that until notification of such date as referred hereinabove under first proviso, the Final Balancing and Settlement Mechanism (FBSM) as approved by Commission under Order in Case 42 of 2006 along with relevant amendments from time to time shall be in operation for the purpose of energy accounting and deviation settlement.</i></p>	<p>MSEDCL does not support concept of implementation of deviation settlement mechanism in two phase i.e without commercial arrangement as stated in this draft DSM mechanism in 1st first phase and with commercial mechanism in 2nd phase, which is supposed to be implemented not later than April 2020. We want commercial arrangement to come with DSM regulation notification.</p> <p>Due to present mechanism of deviation settlement i.e FBSM mechanism, MSEDCL has already incurred a loss of more than Rs.4000 Crs. The yearwise loss is as under :</p> <ul style="list-style-type: none"> • Annual fixed cost component for FY 2011-12 to FY 2017-18 <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="text-align: center;">FY</th> <th style="text-align: center;">Net Imbalance Units in Mus</th> <th style="text-align: center;">MSEDCL's Average fixed cost rate/Kwh, Rs.</th> <th style="text-align: center;">Amount, Rs. Cr.</th> <th style="text-align: center;">Interest component Rs. Cr.</th> <th style="text-align: center;">Total estimated amount Rs Cr</th> </tr> </thead> <tbody> <tr> <td>2011-12</td> <td>-596</td> <td>0.67</td> <td>-40</td> <td>-41</td> <td>-81</td> </tr> <tr> <td>2012-13</td> <td>210</td> <td>0.77</td> <td>16</td> <td>13</td> <td>29</td> </tr> <tr> <td>2013-14</td> <td>1082</td> <td>0.89</td> <td>96</td> <td>57</td> <td>153</td> </tr> <tr> <td>2014-15</td> <td>1509</td> <td>1.09</td> <td>164</td> <td>65</td> <td>229</td> </tr> <tr> <td>2015-16</td> <td>2512</td> <td>1.16</td> <td>291</td> <td>64</td> <td>355</td> </tr> <tr> <td>2016-17*</td> <td>1393</td> <td>1.37</td> <td>191</td> <td>22</td> <td>213</td> </tr> <tr> <td>2017-18*</td> <td>1359</td> <td>1.69</td> <td>230</td> <td>0</td> <td>230</td> </tr> <tr> <td>Total</td> <td>7469</td> <td></td> <td>949</td> <td>179</td> <td>1128</td> </tr> </tbody> </table>	FY	Net Imbalance Units in Mus	MSEDCL's Average fixed cost rate/Kwh, Rs.	Amount, Rs. Cr.	Interest component Rs. Cr.	Total estimated amount Rs Cr	2011-12	-596	0.67	-40	-41	-81	2012-13	210	0.77	16	13	29	2013-14	1082	0.89	96	57	153	2014-15	1509	1.09	164	65	229	2015-16	2512	1.16	291	64	355	2016-17*	1393	1.37	191	22	213	2017-18*	1359	1.69	230	0	230	Total	7469		949	179	1128
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- Variable cost component for FY 2011-12 to FY 2017-18

FY	Net Imbalance Units in Mus	Estimated amount to be recovered, Rs Cr.	Interest component	Total estimated amount , Rs Cr
2011-12	-596	25	26	51
2012-13	210	66	53	119
2013-14	1082	256	154	410
2014-15	1509	520	204	724
2015-16	2512	607	133	740
2016-17*	1393	529	62	591
2017-18*	1359	465	0	465
Total	7469	2468	632	3100

The petition for the same has been filed by MSEDCL in this regard, to hon'ble commission. Hence it is suggested to keep the commencement date of all the regulations at the same time instead of implementation of the regulation in phases. The main hurdle which we see in implementation of proposed deviation settlement mechanism is installation of all interface meters and software for scheduling & accounting.

- 1) **Interface meter issue** : As per ABT order in case no. 42 of 2006 (dated 17.05.2007), STU was directed to install all meter by 30thSep 2007 and as per FBSM order dated 23rd August 2009, it was STU's responsibility to provide Hardware

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		<p>and software required at substation level for Automatic Meter Reading of ABT compliant meters. The STU has failed to comply with both the direction of commission even after lapse of more than a decade. As per data available with MSEDCL regarding metering status of interface meter (Attached herewith as Annexure-A), there are still 47 nos. of T-D interface locations of MSEDCL which are yet to be metered by MSETCL and AMR system is not in place. Due to this reason, presently MSEDCL T-D interface drawal for FBSM mechanism is derived. This resulted in wrong computation of FBSM bill for MSEDCL. The MSEDCL is of view that Three month time period is more than sufficient to install meters at these 47 interface points. Hence it is humble request to commission to issue directive to STU for 100% metering of all these 47 interface points within next three months. Further STU shall also be directed to install both main & check meters at all remaining locations subsequently. But this will be a parallel activity & DSM mechanism should not be delayed for replacement or installation of new meters at interface points; as delay in process of implementation of proposed DSM mechanism will ultimately affect consumers of MSEDCL on account of loss being incurred by MSEDCL due to flaws in existing FBSM mechanism.</p>
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		<p>2) Software for scheduling & Accounting: The software for scheduling & accounting purpose are already available in market & used by some of SLDCs & all RLDCs for same. This available software can be customised to suit Maharashtra DSM regulation & our needs. Further MSEDCL is also ready to extend support of our IT department to SLDC for same.</p> <p>3) Data collection of interface meters: Data of meters at present can be taken through MRI & send to SLDC or directly upload in software by respective substation, generator etc on weekly basis. WRLDC at present collecting MRI data of interface point's weekly basis from all substations as well as generators & based on the MRI data, generating energy audit & same data is also used by WRPC for deviation settlement mechanism. There is no any delay from either WRLDC or WRPC on account of preparation of DSM account or any other commercial settlement on account of MRI data. Hence SLDC can also adopt same methodology till installation of AMR facility by STU. Hence MSEDCL again request Hon'ble commission to direct STU to install necessary infrastructure with AMR facility covering all T-D and G-T interface points. The deadline for same shall be fixed and in case delay in completion of target, commission</p>
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		<p>shall initiate penal action clause 142 of EA for violating directives issued by commission.</p> <ul style="list-style-type: none">• In view of above, MSEDCL suggesting to keep the commencement date of all the regulations at the same time instead of implementation of the regulation in phases. A six month evaluation exercise should be undertaken after implementation of these regulations.• MSEDCL further humbly submit that if immediate implementation of new DSM is not possible then MERC should devise a methodology to compensate MSEDCL's consumer for the losses incurred due to FBSM till revise DSM is implemented including loss incurred in past.• Based on MERC approved MYT tariff order of Mumbai DISCOMs, MSEDCL has worked out provisional recovery of Rs, 1296 Crs payable under FBSM bills from Mumbai utilities toward its energy taken from FBSM pool for period FY2016-17 & FY2017-18. The copy of letter addressed to CE (SLDC) requesting recovery of this provisional amount from respective Mumbai utilities is attached herewith as Annexure-B, This provisional amount is accordingly to us is low as its is 95 % of only though weighted average market price during the term these energy have been overdrawn by Mumbai utilities. <p>Since charges to be determined through a separate order, there is</p>
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		an ambiguity in relation to the deviation to be accounted based on Frequency bound or as per SMP
2(1)L	'Grid Code' means the Grid Code specified by the Commission under clause (h) of sub-section (1) of Section 86 of the Act.	<p>The present state grid code was based on IEGC 2006 & is in force since 1st April 2006. But presently CERC has repealed IEGC 2006 & issued IEGC 2010 on 28th April 2010. Since then CERC has issued various amendment with latest 5th amendment was issued on 12th April 2017. Some of important provisions which are not covered in state grid code are as under:</p> <ol style="list-style-type: none"> 1. Change in time schedule for declaration of day ahead availability by generators from 10:00 hrs to 06:00 hrs. This is important from point of day ahead power planning for DISCOM including option of purchase of power from market. 2. Declaration of availability by generators in case of fuel shortage for avoiding generators to advantage of backdown by increasing DC in anticipation of backdown considering pervious day trend. 3. Trial Run operation before COD 4. Change in technical minimum concept of thermal generators thereby increasing flexibility in generation 5. Change in schedule by seller or buyer. At present change in

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		<p>requisition can be done from 4th time block whereas in state grid code, time period in 6th time block. This help in reducing deviation.</p> <p>6. Compulsory RGMO for generator (coal, gas & hydro) based on installed capacity thereby utilising inherent primary response of generating machine Ancillary service mechanism which serve as tertiary reserve & help in maintaining grid frequency within IEGC band.</p> <p>In view of various amendment in CERC grid code, it is requested to review existing state grid code& amended in line with various amendments in CERC grid code</p>
2(1)(k)	<p>Definition: 'Gaming' in relation to these Regulations, shall mean an intentional mis-declaration of declared capacity by any Seller in order to make an undue commercial gain through Charge for Deviations;</p>	<p>It has been noticed that even buyer especially open access consumer at many times use to intentionally mis-declare the drawal schedule or may not procure from Power Exchange and then overdraw from the grid resulting in additional penalty on MSEDCL. MSEDCL has observed during this June-18 to 6th Sep-18 period that TPC-D was selling power during evening period (in view of high rate during said period) in IEX without having sufficient surplus for said sale. The said matter was brought to notice of SLDC via email as well as written communication (copy enclosed as Annexure-C). But as such no action has been initiated by SLDC.</p>

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The Energy sold by TPC-D in IEX market under shortfall from Jun-18 to 6th Sep 2018 is as under:

Month	Nos of days during which Energy sold in Exchange by overdrawing from grid/state Pool	Energy sold in Exchange by overdrawing from grid/state Pool (Mus)	Revenue received for energy selling in Exchange by overdrawing from grid/state Pool (Rs. In Lac)
Jun-18	11	5.57	327.21
Jul-18	25	8.93	530.96
Aug-18	30	12.52	676.19
Sep-18	3	0.69	38.46
Total	69	27.71	1572.81

(Note: Shortfall is based on Loadstar schedule submitted by TPC-D to MLSDC)

The overdrawal MUS from FBSM pool & amount paid/payable from FY2013-14 to Nov-2016 is as under:

	Pool Imbalance (Mus)	Net Pool Charges (Amt Cr)	Net variable cost (Rs/Kwh)
FY2013-14	810.86	158.51	1.95
FY2014-15	431.18	105.26	2.44
FY2015-16	555.48	156.66	2.82
FY2016-17 (Upto Nov-16)	345.89	86.90	2.51
Total	2143.41	507.32	2.37

As can be seen, average cost incurred for overdrawal to TPC-D in FBSM from FY2013-14 to FY2016-17 (Nov-16) is Rs.2.37 per Units . Hence for overdrawal of 27.71 Mus from state pool, it will be

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		<p>required to pay approx. Rs. 6.56 Crs whereas it has received almost 15.72 Crs from IEX market. That is net profit of 9.16 Crs in just 3month 5 days. The repeated action by said Mumbai DISCOM i.e TPC-D to sale in power by using grid power with intention of financial gain clearly falls under gaming. Such instance might have also occurred in past also, which needs to be investigated.</p> <p>In view of above, buyers also need to be included in the definition of gaming to control such financial gain.</p> <p>As per clause 6.5(1) of IEGC 2010, "<i>gaming is an intentional mis-declaration of a parameter related to commercial mechanism in vogue, in order to make an undue commercial gain</i>".</p> <p><i>On basis of above two facts, definition of gaming shall be revised with inclusion of buyer.</i></p>
2(1)(x)	<p>Definition: 'Time-Block' means a time block of 15 minutes or any such shorter duration as may be notified by Central Commission and State Commission, for which specified electrical parameters and quantities are recorded by special energy meter, with first time block starting at 00.00 hours;</p>	<p>Hon'ble CERC has published staff paper on "Introduction of Five Minute Scheduling, Metering, Accounting and Settlement in Indian Electricity Market". The need for implementing a 5-minute scheduling and settlement at the InterState level is being felt considering the variability of load and renewable especially considering increasing RE penetration in the coming years. The FOR Technical Committee recommended the implementation of its report on Scheduling, Accounting, Metering And Settlement of Transactions in electricity (SAMAST) at the intra-state level. The states implementing SAMAST at the intra-state level are required to</p>
5(3)	<p>The State Transmission Utility shall make necessary arrangements for putting up suitable meters, capable of recording energy flows at 15-minute intervals or any other time interval as specified by the Commission, at the points of injection and drawal. The time</p>	

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	<p>synchronisation of metering system shall be through Global Positioning System with counter check from the State Energy Accounting Centre which is the SLDC.</p>	<p>factor the 5-minute periodicity in the metering as well as software being procured for scheduling and settlement.</p> <p>Hence in view of upcoming development at central level for implementation of scheduling on five minute basis in future, Hon'ble commission is requested to introduced clause regarding installation of new interface meters i.e ABT meters which shall be reprogrammable one so that there will not be any need to replace the new meter if CERC changes its scheduling, accounting & deviation settlement mechanism in future. Presently such meters are available in market.</p>
5(4)	<p>(4) SLDC shall take all decisions regarding the despatch of stations after evaluating all the possible network parameters, constraints, congestions in the transmission network and in the eventuality of any such network aberration, the instructions by the SLDC relating to despatch and drawal shall be binding on all State entities.</p> <p>SLDC shall publish all such information as required for all other State entities to be aware of the energy exchanges taking place within the pool as well as exigency conditions, if any with regard to despatch of power</p>	<p>The specific reason for taking decision regarding the despatch of stations in such case shall be informed to concerned DISCOM by SLDC. Further fair commercial arrangement for settlement in such case needs to be defined.</p> <p>For example, consider a case of a particular time block when DISCOM 'A' has forecasted load of 10,000 MW & accordingly Load generation balance has been done based on its decentralised MOD stack. Similarly DISCOM 'B' has forecasted load of 5000MW & accordingly kept load generation balance. Now in real time, suppose</p>
6(B)(iv)	<p>iv. During real time operation, in case the grid parameters including frequency, voltage parameters and transmission line loading and substation loading conditions deviate beyond permissible operating range, SLDC shall take suitable measures in the interest of reliable</p>	<p>RE generator, generator higher than schedule resulted in heavy underdrawal. To control such underdrawal, SLDC gives backdown instruction to one generator of DISCOM 'A' & other generator of DISCOM 'B' ; even though both DISCOM actual Demand is as per</p>

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<p>and safe grid operations and issue necessary despatch or curtailment instructions in accordance with Centralised MoD principles for the state as whole, as per approved MoD Guidelines so as to maintain the load- generation balance and comply with conditions stipulated under IEGC and State Grid Code.</p>	<p>forecasted i.e scheduled. The commercial settlement in such case would be required to be explained in this proposed deviation settlement mechanism. One of solution in such case would be as given in CERC Ancillary service regulation i.e regulation down case.</p> <p>Commercial arrangement for decision taken by SLDC to meet exigency situation :</p> <ul style="list-style-type: none"> • The Regulation is not clear for the treatment of Hydro Power used by the Distribution Licensee during the peak period to maintain Grid Frequency of the State under the direction of MSLDC • MSEDCL's Hydro especially Koyna is used by SLDC as a counter measure. As Hydro generations like Koyna are contracted with MSEDCL only and has limitation on use on account of allocated water quota. • Hon'ble Commission has given specific treatment for TPC Hydro. The relevant provision in scheduling & Dispatch code [clause 7(xx)(vi)] is reproduced as follows :-" <i>TPC-Hydro Generation is primarily intended to meet peak demand of Mumbai discoms in accordance with the PPA/Contracts/Allocation and will be operated as per commission directives given in its order</i>". • Whereas in respect of utilisation of Hydro stations contracted with MSEDCL, provision made in scheduling &
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		<p>Dispatch code [clause 7(xx)(iv)] is as follows : <i>"MSLDC, taking into consideration grid security, may regulate dispatch from Koyna and other hydro stations, which shall be complied with by such hydro stations. And Priority shall be given to reservoir-based hydro stations during peak hours. Koyna HGS is primarily intended to meet peaking requirement and shall be scheduled accordingly</i></p> <ul style="list-style-type: none">• MSLDC is using Koyna as well as other hydro station contracted with MSEDCL, not only to control overdrawl of Mumbai DISCOM but also to meet demand of Mumbai .• It is noticed from monthly DSR data of June -2018 to Oct-2018 that Mumbai DISCOM instead of purchasing from power exchange overdrawn the power from the State pool when the energy rates at power exchange were very high resulting in over usage of Koyna by MSLDC so as to control overdrawl from the central grid. The total overdrawal by Mumbai DISCOM during this period was 247Mus and if Mumbai DISCOM would have purchased this power from IEX, then total purchase cost would have been Rs. 128 Crs @ average power purchase cost Rs.5.18 /kwh. The present FBSM mechanism will not able to recover such charges from Mumbai DISCOM. Even MSLDC has not initiated proper action on Mumbai DISCOM to control overdrawal by Mumbai
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		<p>DISCOM; inspite of time to time intimation to SLDC in real time as well as post fact basis by MSEDCL. Hence lack of proper action form MSLDC and flaws in existing deviation settlement mechanism, are most probable reason behind overdrawal from Mumbai DISCOM. The table showing monthwise overdrawal by Mumbai, Use of Koyna Hydro to control OD of Mumbai DISCOM & expected power purchase cost , if overdrwal energy would have purchased from IEX market is attached herewith as Annexure-C.</p> <ul style="list-style-type: none"> • The instances were also noticed on continuous basis during this June to Sep 2018 which showed that TPC-D has sold power in exchange during evening peak even though it has no sufficient surplus for selling of power in exchange. Thus use grid energy as source of selling power into exchange. This matter was intimated to SLDC (copy Enclosed as Annexure-D), but no action initiated by SLDC inspite of intimation. • Further irrespective of overdrawal of any DISCOM or under injection by seller, RLDC schedule costly RLNG power or URS power (almost Rs.8 per kwh) to MSEDCL wherever state is on overdrawal. • In future, if such incidence increases, the DSM rate cannot offset the loss face by MSEDCL.
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		<ul style="list-style-type: none">• The use of contracted power of MSEDCL for meeting demand or to control overdrawal of other DISCOM, that too without consent, is against natural justice.• Hence its MSEDCL earnest submission that Koyna should not be used as a balancing mechanism. However in case of exigency if koyna is used by MSLDC (that too with prior permission/consent from MSEDCL) to control overdrawal or to meet demand of DISCOM other than MSEDCL then there must be a fair commercial mechanism to settle such transactions. The commercial mechanism should be such that it will deter other DISCOM to use Koyna to control its overdrawal and economically forced them to manage their purchase effectively. <p>Proposed commercial arrangement should be as under</p> <ul style="list-style-type: none">• Rate of Koyna Hydro used to meet demand of other than MSEDCL shall be equivalent to higher of following<ol style="list-style-type: none">1. Highest variable cost in MOD. Presently Highest variable cost station is Gandhar RLNG which is Rs.8.13 per kwh<p style="text-align: center;">Or</p><ol style="list-style-type: none">2. Rate of power in IEX for respective time block + 10%• In case schedule of costly power to MSEDCL by RLDC, MSEDCL shall be compensated by recovering both fix &
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		<p>variable cost of that station from overdrawing DISCOM at that time.</p> <ul style="list-style-type: none"> • MSEDCL is once again requesting commission that Hydro generation contracted with MSEDCL shall be used exclusively for meeting demand of its own and not as ancillary service as in case of TATA hydro, otherwise it would be unfair to MSEDCL's consumers • The other DISCOM by overdrawing from grid either intentionally or unintentionally shall not be allowed , as it will not only jeopardise power planning of MSEDCL but also increasing burden on consumers of MSEDCL. <p>Need of compulsory reserve by Mumbai DISCOM</p> <ul style="list-style-type: none"> • At present, as against peak demand of 3600MW , firm power tieup under Long term is only 2420MW & RE power tie up is 387. Hence more than 30% power is purchase from short term & at present no reserve to meet contingency. <table border="1" data-bbox="1163 1065 1990 1343"> <thead> <tr> <th>Discom</th> <th>BEST</th> <th>TATA – D</th> <th>REL- D</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Peak Demand</td> <td>838</td> <td>1207</td> <td>1536</td> <td>3581</td> </tr> <tr> <td>Thermal+ Hydro (LTOA)</td> <td>646</td> <td>674</td> <td>1100</td> <td>2420</td> </tr> <tr> <td>RE (LTOA)</td> <td>20</td> <td>205</td> <td>162</td> <td>387</td> </tr> <tr> <td>Considering CUF of 20% for RE total Tie-up under long term</td> <td>650</td> <td>715</td> <td>1132</td> <td>2497</td> </tr> <tr> <td>% LTA w.r.to Peak Demand</td> <td>77.6%</td> <td>59.2%</td> <td>73.7%</td> <td>69.7%</td> </tr> <tr> <td>Power Purchase under 0% for STOA</td> <td>188</td> <td>492</td> <td>404</td> <td>1084</td> </tr> </tbody> </table>	Discom	BEST	TATA – D	REL- D	Total	Peak Demand	838	1207	1536	3581	Thermal+ Hydro (LTOA)	646	674	1100	2420	RE (LTOA)	20	205	162	387	Considering CUF of 20% for RE total Tie-up under long term	650	715	1132	2497	% LTA w.r.to Peak Demand	77.6%	59.2%	73.7%	69.7%	Power Purchase under 0% for STOA	188	492	404	1084
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- This lack of firm PPA of Mumbai DISCOMs gives them opportunity to use power contracted by MSEDCL as unscheduled drawal. This can be seen from FBSM bills issued by MSLDC from 2011-12 to Nov -2016 & from DSR reports of MSLDC , each year Mumbai DISCOM have been overdrawing power from Grid.

UI Energy as per FSBM bills of MSLDC (in MUS)				
FY	TPC-D	R-Infra	BEST	Total
FY2011-12	+398	-337	-402	-341
FY2012-13	+817	-608	-370	-160
FY2013-14	+811	-185	+373	+999
FY2014-15	+431	+38	+399	+868
FY2015-16	+555	+727	+322	+1604
FY2016-17 (Tiil Nov-2016)	+346	+606	-31	+921
Total as on Nov-2016	+3358	+240	+293	+3890

UI Energy as per DSR report of MSLDC (in MUS)	
FY2016-17 (Dec-16 to Mar-17)	+401
FY2017-18	+1664
FY2018-19 (Oct-18)	+773

(Note : + ve sign indicate overdrawal energy from grid)

- Hence these DISCOM should be mandated to have atleast 90% power on LTA and any unscheduled withdrawal from intrastate grid should be at price higher than prevailing

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		<p>market price in exchange. Infact, CERC also with view to deter DISCOM to use grid as market by overdrawing, have proposed to link DSM vector rate with market clearing price.</p> <ul style="list-style-type: none">• Hence hon'ble commission is requested to mandate Mumbai Licensee to execute adequate PPA to meet their demand, otherwise they when not able to get power from short term market , may be deliberately on account of higher price in power exchange or short term market, will use MSEDCL power. <p>Creating Spinning reserve at intra state to meet exigency by SLDC:</p> <ul style="list-style-type: none">• Instead of using koyna hydro to meet exigency situation, the hon'ble commission is requested that reserve shall be created at intra state level as mentioned in report of CERC committee on spinning reserve published by CERC on 17th Sep 2015. Effort shall be taken to create primary response, secondary response (Automatic Generation control) and tertiary reserve like ancillary service mechanism at intra state level.• Hence it is submitted that provision shall be made in regulation thereby mandating DISCOM to tieup with Hydro, battery storage, gas station or any such fast responding tertiary reserve to meet its exigency. The DISCOM wise quantum shall also be fixed for such mandatory reserve. In
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		<p>view of high penetration of RE generation in future , the tertiary reserve will be needed as balancing mechanism. Hence looking into future power scenario, commission is requested to initiate action in this important matter at earliest.</p>
	<p>Clause 4 Applicability All Seller(s), including OA generators, captive generators (excluding in-situ captive generators) connected to InSTS but excluding wind and solar generating station(s)</p>	<ul style="list-style-type: none"> • It is a welcome step to bring the generators under the ambit of the intra-state ABT mechanism to bring about disciplined operation i.e. the UI charges for the deviations from the schedule are borne by the respective generators to avoid undue burden on the consumers. • However it is requested to provide more clarity. The clause to be reworded as follows: "All Seller(s), including State Generators, OA generators, captive generators (excluding in-situ captive generators) connected to InSTS or to Distribution network but excluding wind and solar generating station(s)"
13(2)	<p>Energy Account Statement for Deviation Settlement of Partial Open Access Consumers connected to the InSTS and all open access consumers connected to the distribution network shall be in accordance with the provisions of MERC (Transmission Open Access) Regulations, 2016 and its amendments thereof and MERC (Distribution Open Access) Regulations, 2016 and its amendment thereof.</p>	<ul style="list-style-type: none"> • <i>It is mentioned in SOR that in respect of RE generator other than Wind & Solar, generator with installed plant capacity more than 25MW are only required to submit schedule.</i> • Does it means that generator below 25MW installed capacity will be out of ambit of this regulation. If so, large quantum of RE generators , notably Biomass, Bagasse, Cogen etc will be out of ambit of this regulation.

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particulars	Cogen		Small Hydro & Others	
	Nos	MW	Nos	MW
Total Nos of Generators	112	2148	57	1061
Nos of generators with installed capacity less than 25 MW	87	1354	46	306
% of generator with installed capacity less than 25MW w.r.to total	78%	63%	81%	29%

- *The commission in SOR in point 3.2(a) has mentioned that "all state entities shall have equal & non discriminatory treatment about DSM". Excluding these RE generator will be like giving some discrimination to generator.*
- *Further in case of CERC DSM regulation -2014, there is no any such condition in respect of applicability for generator or buyer under DSM mechanism with regards cap on installed capacity. All intrastate generator irrespective of installed capacity & level of connectivity (i.e Transmission or distribution) shall be included in this proposed regulation..*
- *Further as in case of CERC DSM regulation, DSM charges are applicable for generating station as a whole like Vindyanchal stage-I having 6 units of 210MW each & not individual unit in that respective station. This will help in reducing generator deviation. Hence It is suggested that*

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		<p><i>generating station having long term power purchase agreement with same variable rate in MOD stack shall be considered as one state pool participant for proposed DSM mechanism.</i></p> <ul style="list-style-type: none">• Further, in case of generators like Sai Wardha & JSW, Ratnagiri , some units are reserved for captive use. These units shall be considered as separate state pool participant. For example. In case of Sai Wardha, part capacity of Unit No.3 & 4 and in case of JSW, Ratnagiri Unit No.3&4 are used to meet captive load. Hence it is suggested that these units shall be considered as separate state pool participant. Similarly Units which are specifically for merchant capacity shall be considered as separate state pool participant. The suitable provision, in view of above submission may please be incorporated in applicability clause.• Presently RE Solar & Wind generators have no deviation charges till its absolute error exceeds 15%, whereas conventional generators or buyer have no such limit given. Hence deviation by these RE generators having contracted with partial open access consumers have to be borne by DISCOM and mainly by MSEDCL. Now consider a case of a partial open access consumer having total CD of 15MW with 60% contracted with RE generator and Now to meet demand
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		<p>of 10MW, generator has to schedule 9MW. But due to some reason, RE generator only generated 4MW. In such case, partial OA consumer will draw rest 6MW from DISCOM. Since CD with DISCOM was 6MW, DISCOM will not get any additional charges for absorbing deviation of RE generator of partial open access consumer & other hand, DISCOM will have option like</p> <ol style="list-style-type: none">1. <i>overdraw from grid & pay DSM charges</i>2. <i>Schedule costly generation</i>3. <i>Curtail its load and keep our consumer in dark</i> <p>Under all above option, there will be financial implication to DISCOM. Hence it is suggested following two changes:</p> <p>A: Open Access consumer whether partial or full taking power beyond a particular capacity say 5 MW should be made pool participant otherwise all OAs would become partial OA and escape away DSM, if there is shortfall in generation or no generation. Partial open access consumers particularly with more than 50% contract demand from RE source shall be also part of present deviation settlement mechanism</p> <p>B: In respect of balance, partial open access consumers, Existing MERC (Transmission/Distribution Open access regulation shall be amended and any deviation of RE generator shall be borne by concerned partial OA consumer as a temporary tariff Units</p>
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& rate of temporary tariff units shall be increase As per recent tariff order approved by Hon'ble commission in case no 195 of 2017, rate of temporary tariff is Rs. 11.75/Kwh. Recently power rate in Indian Energy exchange has reached to almost Rs.18.63/Kwh. The maximum rate discovered IEX market for 26th Sep to 9th Oct 2018 is as under :

Date	Rs/Kwh	Date	Rs/Kwh	Date	Rs/Kwh
26-Sep	12.15	03-Oct	18.00	22-Oct	11.00
27-Sep	14.25	04-Oct	18.20	23-Oct	16.00
28-Sep	15.37	05-Oct	14.55	24-Oct	17.00
29-Sep	16.49	06-Oct	17.55	25-Oct	17.53
30-Sep	9.50	07-Oct	9.50	26-Oct	18.29
01-Oct	17.61	08-Oct	18.00	27-Oct	12.01
02-Oct	10.70	09-Oct	14.55		

The cost of generation of electricity from diesel generator is also more than Rs. 15 per Kwh with additional fixed cost. Hence to bring discipline in open access for accessing its daily requirement, to deter them from overdrawal, it is necessary that existing rate of temporary tariff shall be increased further. Hence, a separate rate of temporary tariff may be created for open access consumers.

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		<p>Applicability of this Regulations to Deemed Licensee such as Railways, SEZ, etc</p> <ul style="list-style-type: none"> As per the draft Regulations, the Buyer is defined as below: <i>d. 'Buyer' means a person, including distribution licensee or open access consumer, purchasing electricity through a transaction scheduled in accordance with the regulations applicable for short-term open access, medium-term open access and long-term access;</i> It is submitted that as the definition includes the distribution licensee, all the distribution licensee which includes Deemed distribution licensee, SEZ, Railway, Distribution Licensee as per Section 13 and 14 also gets included.
6(B)	<p>(B) Guiding Principles for Scheduling and Despatch: All the Sellers and Buyers under these Regulations shall be guided by the scheduling and despatch procedure to be formulated by the SLDC in accordance with the provisions of Maharashtra State Grid Code and amendment thereof. The MoD Guidelines and the scheduling and despatch process thereon shall be governed by following principles:</p>	<ul style="list-style-type: none"> As per present clause 6.5 (3) of Indian Electricity Grid Code 2010, ISGS station has to submit its availability by 06:00 Hrs but as per scheduling & Dispatch code, intra state generator has to submit its availability by 10:00 hrs. If this provision of scheduling & Dispatch code is made in line with IEGC provision then it would help DISCOM for next day power planning.
7(1)	<p>7. Declaration of Capacity and Scheduling (1) The provisions of the Maharashtra State Grid Code and</p>	<ul style="list-style-type: none"> At present, generators are not informing any change in availability directly to DISCOM. The hon'ble commission is

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	<p>Maharashtra Electricity Regulatory Commission (Transmission Open Access) Regulations, 2016 and Maharashtra Electricity Regulatory Commission (Distribution Open Access) Regulations, 2016 as amended from time to time, shall be applicable for declaration of capacity and scheduling.</p>	
7(2)	<p>(2) The generating station, as far as possible, shall generate electricity as per the day-ahead generation schedule finalized by the SLDC in accordance with the Maharashtra Electricity Grid Code. Provided that the revision in generation schedule on the day of operation shall be permitted, in accordance with the procedure specified under the Maharashtra State Grid Code and Maharashtra Electricity Regulatory Commission (Transmission Open Access) Regulations, 2016 and Maharashtra Electricity Regulatory Commission (Distribution Open Access) Regulations, 2016 as amended from time to time, as the case may be.</p>	<p>requested to make necessary provision whereby generators shall declare variation in declared capacity, immediately to the concerned distribution licensee in addition to SLDC.</p> <ul style="list-style-type: none"> • Also, in case generator has not submitted its schedule within stipulated time period, action needed to initiate on concerned generator, which is mentioned in SOR 3.5.3(20) & same needs to be part of regulation. The action proposed in SOR of this draft regulation is as follows" • Further methodology to be adopted by DISCOM for consideration of generator day ahead availability in case generator fails to upload its availability within stipulated time period needs to be specified. • It is mentioned in SOR by commission at 3.5.4(1) that "MSLDC may modify schedule during operation in a day only under exceptional circumstance (to be defined as force majeure/system emergency conditions) ". If DISCOM are not allowed to revise it schedule in real time as per provision in IEGC -2010, then how will it possible for DISCO to manage its deviation • It is also mentioned in SOR by commission at 3.5.4(7) that " revision of declared capability by seller(s) and requisition by buyers for remaining period of day shall be permitted with notice. Revised schedule/declared capability in such cases

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		<p>shall become effective from the 6th time block, counting the time block in which the request for revision has been received by MSLDC to be the first one.”</p> <ul style="list-style-type: none">• This provision is against clause 6.5(18) of IEGC 2010, wherein revision is effect from 4th time block. Hence commission is requested to amend this provision to make it inline with IEGC -2010.• Further MSEDCL request that instead of centralised MOD in real time, there should be centralised operation of decentralised MOD of each DISCOM by SLDC. This is necessary because, centralised MOD will create commercial complication in settlement of deviation. For example, assume a centralised MOD with of present Month ie Nov.2018. Now suppose each DISCOM has made its load generation balance with forecasted demand & in real time, there is demand drop of MSEDCL by 500MW, which result in backdown of Mumbai DISCOM generator, say Dahanu as well as MSEDCL will revise schedule of solapur Station to extend of backdown by 135MW i.e 45% of total Solapur schedule of 300MW. Since demand of MSEDCL has been reduced by 500MW but schedule has been revised by only 135MW. In case of decentralised MOD, MSEDCL would have backdown by 500MW of its own contracted generator
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		<p>for its load generation balance. But due to centralised MOD, MSEDCL generation schedule was revised by only 135MW & in deviation settlement, MSEDCL would have to incurred unnecessary financial loss on account of underdrawal above deviation limit.</p>
6(B)(i)	<p>For the purpose of load generation balance, Buyer/Utility-wise MoD principle shall be followed with opportunity for inter-se exchange of un-requisitioned surplus available power amongst Buyer(s)/Distribution Licensee(s) to optimise their cost of power procurement.</p>	<ul style="list-style-type: none"> • The SLDC must schedule URS to DISCOM requesting only after written consent from DISCOM whose URS power will be availed. Moreover DSM objective should be to reduce the unscheduled interchange of power not the reduction in cost, otherwise DISCOM especially those DISCOM having less than 100% tie-up under long term power purchase agreement will use this mechanism to procure power as an option from other utility mainly MSEDCL. • The rationale behind taking consent of DISCOM, is power planning strategy of buyer/DISCOM. For example, presently coal shortage problem has severely affected power supply availability of many DISCOM. Hence in order to save coal of contracted generator, MSEDCL in FY2017-18 and even in FY2018-19 has adopted strategy to purchase power from Energy exchange, particularly when rate are lower like in monsoon and winter season. Due to same, schedule of contracted generator was planned to be at technical minimum. It helped saving in coal which can be used in

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		<p>months when power need are high and market price is also very high. Hence if URS power from such contracted generator available to other DISCOM and if this URS power is scheduled by SLDC on its requisition without consent of original buyer (MSEDCL), then coal of said station will be used to meet shortfall of other DISCOM'B'. This will defeat power planning strategy of DISCOM 'A' and which then will have to purchase costly power in peak power demand months.</p> <ul style="list-style-type: none">• Like same, there will be other type of power planning strategy. Buyer DISCOM who depends on short term power purchase to some extent like if market price are high then they will go for URS being cheaper than market price <p>In view of above, consent must be taken by DISCOM for availing URS of other DISCOM.</p> <ul style="list-style-type: none">• MSEDCL suggest that provisions in relation to scheduling of URS power to be included and consent of buyer/DISCOM whose surrender power is being requested by other buyer/DISCOM must be obtained before scheduling of URS to other buyer/DISCOM.• MSEDCL submits that SLDC must schedule URS power to the DISCOM (in case of such shortfall, grid emergency and stability, etc) post written consent from DISCOM whose URS
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		<p>power will be availed.</p> <ul style="list-style-type: none"> • Further in case availing URS power as per CERC regulation is concerned, beneficiary cannot availed URS power from particular station unless that beneficiary also has some share in that particular station. For example, MSEDCL can avail URS of ISGS stations in which it has share allocated by Ministry of power. In other word, MSEDCL can schedule USR only with long term contracted ISGS station. • Hence its is suggested that for scheduling of URS, there must be atleast some agreement within DISCOM for sharing of URS power.
6(B)(ii)	<p>ii. The rate for settlement of such inter-se exchange of un-requisitioned surplus power shall be linked to their respective marginal cost of power procurement (Utility-wise MoD) as applicable for the relevant monthly period.</p>	<p>In case of URS power, rate of URS power shall be higher of following :-</p> <ol style="list-style-type: none"> 1. Marginal cost of power procurement + Average fix cost + Average per unit cost required to incurred for scheduling of schedule power from power exchange or short term (i.e per uit POC charges & losses) 2. Total Tariff (Variable cost + Fixed Charge) of station for respective month + Average per unit cost required to incurred for scheduling of schedule power from power exchange or short term . 3. Landed cost of power purchase from power exchange + 10% <p>The rational behind above is as under:</p>

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		<p>In case of use of URS power, fixed cost of station needs to be borne by DISCOM who avail said power. The same concept is used for scheduling of URS power at inter state level. However for availing URS of particular station, concerned DISCOM/Buyer/beneficiary must have power purchase agreement with that station. Otherwise DISCOM/Buyer has to purchase from intraday Energy Exchange market by bidding process. The minimum time required to schedule power under such transaction is two hours. Moreover concerned DISCOM/Buyer has to pay POC drawal charges & also required to bear POC drawal loss. The average landed cost is amost 35 to 40 paisa.</p>
6(B)(iii)	<p>iii. SLDC shall maintain and publish separate account of such exchange of surplus power capacity amongst the Buyers/Distribution licensees and also publish monthly report indicating incidences where Distribution Licensee failed to contract available cheaper surplus power. The Commission shall verify and ascertain the efficacy of power procurement/sale vis-à-vis un-availed cheaper surplus capacity while undertaking scrutiny and approval of annual revenue requirement of the distribution licensee.</p>	<p>Since URS power of one entity can be availed by other entity only from 4th time block, there are chances that complete URS may not be used by DISCOM</p> <p>Hence non availing URS shall not be linked with efficacy of power procurement/sale of Distribution licensee.</p> <p>Further MSEDCL suggest that for scheduling of URS power, consent of buyer/DISCOM whose surrender power is being requested by other buyer/DISCOM must be obtained before scheduling of URS to other buyer/DISCOM.</p>
6(E)	<p>(E) Settlement Period: Preparation and settlement of 'State Deviation Pool Account' shall be undertaken on weekly basis coinciding with the mechanism followed for regional energy accounts.</p>	<p>Regional Energy account is settled on monthly basis. Hence correction as under is needed</p> <p>"Preparation and settlement of 'State Deviation Pool Account' shall</p>

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		<p>be undertaken on weekly basis coinciding with the mechanism followed for regional Deviation settlement account."</p>
<p>6(F)</p>	<p>(G) Deviation Pool Price Vector: The pricing of deviation of Buyers/Sellers shall be in accordance with the Deviation Price Vector as specified in the Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) Regulations, 2014 and its amendments thereof.</p> <p>Provided that deviation of wind and solar generators shall be treated as per the provisions of "Maharashtra Electricity Regulatory Commission (Forecasting, Scheduling and Deviation Settlement for Solar and Wind Generation) Regulations, 2018".</p> <p>Further, additional condition for a change in sign of the deviation shall be met once every 12-time blocks by Buyer/Seller, failing which, additional charges @10% of the Deviation Charges applicable shall be levied for the duration of continuance of violation.</p>	<ul style="list-style-type: none"> • MSEDCL welcomes the provision to allow the sign till 12 sign block as demand is uncontrollable factor and due to any changes in demand and availability, revision in generator is required to be undertaken alongwith the consideration of renewable power in the system • However, it is submitted that deviation can be easily controllable by Generator and therefore for Seller, the deviation for change in sign can be allowed for a shorter duration like six time blocks or lower. <p>Provision for Monitory penalty for SCADA visibility:</p> <ul style="list-style-type: none"> ▪ As per communication regulation [clause 7.6(i)], it is responsibility of SLDC for integration of communication system in intra state network, distribution system and generating stations at SLDC and for monitoring , supervision and control of power system and adequate data availability in real time and as per clause 7.7(i) of CERC communication regulation , STU is responsible for planning and coordination for development of reliable backbone communication for data communication within a State among State Load Despatch Centres, DISCOM control centres along with Generating Stations in the State, STU Sub-Stations, IPPs, and
<p>9(A)(1)</p>	<p>9. Charges for Deviations</p> <p>(A) Deviation Charges for Sellers and Buyers:</p> <p>(1) The Charges for Deviation for all the time-blocks shall be payable for over-drawal by the Buyer and under-injection by the Seller and receivable for under-drawal by the Buyer and over-injection by the Seller, which are State entities, and shall be worked out on the average frequency of a time-block by considering the Price Vector for Deviation Charges as specified in the Central Electricity Regulatory</p>	

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	<p>Commission (Deviation Settlement Mechanism and related matters)Regulations, 2014 and its amendments thereof considering the methodology specified in Annexure1 of these Regulations and subject to the conditions stipulated under Clause (2) to (8) of this Regulation:</p> <p>Provided that, a change in sign of the deviation shall be made once every 12-time blocks, failing which additional charges @10% of the Deviation Charges applicable shall be levied for the duration of continuance of violation.</p> <p>Provided further that the applicability of above prescribed additional charges for such failure by Buyer(s)/Distribution Licensee(s) shall be applicable from date to be notified separately.</p>	<p>renewable energy generators within State system. However presently communication system provided by STU is very unreliable.As per clause 12 of said communication regulation, “:The owner of communication system shall maintain the channel availability up to 99.9%”. In case central drawal points on basis of which state UI is managed , ownership lies with STU.</p> <ul style="list-style-type: none"> ▪ The real time decisions regarding scheduling are taken based on SCADA data visibility. In Maharashtra, on many occasions, it is observed that due to SCADA visibility issues, state drawal was not computed correctly. In fact in Maharashtra, central Sector drawal is computed based on SCADA of PGCIL & SCADA of STU. As per prudent practice, SLDC has to monitor State UI based on SCADA at STU. But presently SLDC is not following this practice. The instances of difference in CS drawal computation as per SCADA data of STU & PGCIL is communicated to both SLDC & WRLDC but action are not taken in time. Due to SCADA visibility issue, it was observed that there is difference between UI computed based on SCADA & SEM data, which resulted in additional financial burden to tune of 95 Cr in FY2017-18 & Rs.50CrS till Oct-2018. The table showing financial loss on account of SCADA data visibility
10(K)	<p>(K) In the event of sustained deviation from schedule in one direction (positive or negative) by any state entity, such State Entity (Buyer or Seller) shall have to make sign of their deviation from schedule changed, at least once, after every 12 time blocks.</p> <p>To illustrate, if a state entity has positive deviation from schedule, i.e.,from 07.30 hours to 10.30 hours, sign of its deviation from schedule shall be changed in the 13th time block, i.e., 10.30 hours to 10.45 hours either from positive to negative or from negative to positive; as the case may be.</p>	

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		<p>issue is attached herewith as Annexure-E.</p> <ul style="list-style-type: none"> ▪ Till corrective action taken, UI is managed with wrong drawal data. Thus it can be seen that SCADA visibility plays important role in managing UI thereby DSM charges. Similar SCADA data visibility of many RE generators is intermittent, leading to wrong computation of Demand. However in present regulation (both at CERC & SERC), there is no monetary penalty for SCADA data availability. This provision is need of time to ensure 100% SCADA visibility & to improve grid frequency on account of wrong decision taken due to SCADA data. ▪ It is Proposed that if State doesn't violate limit of deviation but on account of SCADA problem, if State is being liable for any UI charges as per SEM Data, the said charges to be recovered from default entity i.e. STU as SCADA data visibility is responsibility of the STU.
6(H)	<p>(H) Deviation Volume Limit: To ensure grid discipline and grid security, conditions for Deviation Volume Limit and consequences of exceeding such Deviation Volume Limit by way of levy of Additional Deviation Charges as specified under Regulation 10 shall be applicable.</p>	<ul style="list-style-type: none"> ▪ CERC had earlier fixed deviation limit of 150 MW to Maharashtra vide DSM regulation which come into existence in 17th February 2014. Thereafter considering DSM limit applicability to wind & Solar & predominant penetration of RE in some states, allocated additional 100MW to Maharashtra on account of its RE rich status on account of exceeding its RE installed capacity more than 3000MW. This was
9(A)(3)	(3) The Charges for Deviation of under-drawal by the Buyer in a time	

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	block in excess of 12% of the schedule or [X]MW, whichever is less, shall be zero; wherein limit of [X] MW shall be determined as per the methodology specified under Clause (B) of the regulation 10 of these Regulations;	
10(A)	<p>10. Limits on Deviation Volume and Consequences of Crossing Limits</p> <p>(A) The over-drawal or under-drawal of electricity by any Buyer during a time block shall not exceed 12% of its scheduled drawal or [X] MW, the limit arrived as per clause (B) of this Regulation, whichever is lower, when grid frequency is between the range of '49.70 Hz and above to below 50.05 Hz.'</p>	<p>amended vide third amendment of CERC (which is effective from 30th May 2016. The copy of relevant page of Third amendment of CERC DSM regulation is attached herewith as Annexure-F</p> <ul style="list-style-type: none"> Mumbai DISCOM's tie up RE generation capacity is much less than 3000MW; in fact only about 700MW. Hence Maharashtra would not have got any additional margin on account of RE generation contracted capacity of Mumbai DISCOM. Whereas MSEDCL tied up RE generation capacity only from Wind, Solar is more than 4800 MW & will increase further in future exponentially. Hence it is submitted that additional 100MW deviation limit allocated by CERC to Maharashtra shall be exclusively allocated to MSEDCL & deviation limit of all buyers (including MSEDCL) than shall be computed with State Volume Limit as 150MW in proportionate of recorded NCPD. Accordingly, deviation limit of buyer shall be computed with State Volume Limit as 150MW. After calculating volume limit for MSEDCL on above formula taking 150MW as state volume limit, 100MW allocated to Maharashtra for being renewable energy state shall be added. For example if MSEDCL peak demand is 85% of ΣNCPD then MSEDCL volume limit as per above formula will be 127.5 MW. Hence
10(B)	<p>(B) The Volume Limit of [X] MW for distribution licensee(s) and Buyers shall be determined as under:</p> <p>i. Minimum of (12% of schedule, (Peak Demand of Distribution Licensee or Buyer / ΣNCPD) x State Volume Limit)</p> <p>Where, NCPD (Non-Coincident Peak Demand) represents the sum of Peak Demand of Distribution Licensee(s) and Buyer(s) subject to the condition stipulated under the following sub-clause (iii).</p> <p>ii. State Volume Limit shall be linked to Volume Limit (8L) applicable to the State as per the CERC (Deviation Settlement Mechanism and related matters) Regulations, 2014 and its amendments thereof;</p> <p>iii. Where Peak Demand of the Distribution Licensee shall be recorded as Peak Demand in the previous Financial Year or</p>	

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	<p>Projected Peak Demand of Buyer in ensuing Financial Year, whichever is higher;</p> <p>Provided that no over-drawal of electricity by any Buyer shall be permissible when grid frequency is "below 49.70 Hz" and no under-drawal of electricity by any Buyer shall be permissible when grid frequency is "50.05 Hz and above".</p>	<p>total deviation limit allowed to MSEDCL should be 127.5 +100 i.e 227.5MW.</p> <ul style="list-style-type: none"> • In case generator rational behind considering deviation volume as 10MW needs to be given. • Recorded Peak demand shall be considered & not projected peak demand for calculation of deviation volume limit.
6(l)	<p>(l) Premise for Allocation of Losses: For scheduling purposes, intra-state transmission system losses as approved by the Commission shall be allocated amongst the State entities in proportion to the schedule drawal by each State Entity.</p> <p>Provided that State Load Despatch Centre shall maintain account of actual intra-state transmission system loss for each time block and publish reconciliation statement of 52 weekly average loss vis-à-vis approved loss by the Commission on its website.</p>	<ul style="list-style-type: none"> • As MSEDCL is of the opinion that Utilities' drawal should be considered at their actual T-D periphery with MSETCL, there has to be one loss for consideration of scheduling of power in Maharashtra and that is InSTS loss of Maharashtra. Therefore, MSEDCL welcome this suggestion of considering Intra-State Transmission System Losses for scheduling purposes • The calculation of separate drawal& injection loss as used for scheduling of power from ISTS network needs special mechanism like point of connection methodology being used by NLDC. Hence MSEDCL is of opinion that scheduling loss i.e.InSTSdrawal loss must be same for all entity irrespective of whether Entity is located in MSETCL transmission network or not. • The 15min blockwise intra state transmission loss alongwith data shall be made available by SLDC on its website.

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		<ul style="list-style-type: none"> Proposed draft Regulations is silent on the impact to be calculated for any variation between Approved Loss and 52 weekly average loss
8(1)	<p>8. Treatment for Gaming</p> <p>(1) The Commission, either suo-motu or on a Petition made by the SLDC, or any affected party, may initiate proceedings against any generating company or Seller on charges of gaming and if required, may order an enquiry to be made by such officer of the Commission or such other party as the Commission may deem fit. The enquiry officer so appointed shall submit his findings within such time as may be fixed by the Commission and such investigating officer or authority shall exercise all powers as envisaged under Section 128 of the Act.</p> <p>(2) If in the proceeding initiated by the Commission or in the enquiry made in this regard under Clause (1) above, it is proved that any generating company or Seller has indulged in gaming, the Commission may without prejudice to any other action under the Act or Regulation made there under, disallow any Charges for Deviation to such Seller or generating company during the period of such gaming.</p>	<p>In addition to penal action as proposed in draft, action shall also be taken on concerned generator for repeated incidences.</p>
9(A)(2)	<p>(2) The Charges for Deviation of generating stations regulated by the Commission using coal or lignite or gas supplied under Administered</p>	<ul style="list-style-type: none"> Since generation deviation can be managed, it is necessary that for under injection at low frequency i.e beyond IEGC

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	Price Mechanism (APM) as fuel, when actual injection is higher or lower than the scheduled generation, shall not exceed the Cap Rate to be determined by the Commission from time to time [394.3]Paise/kWh.	<p>frequency band, generator needs to be penalised.</p> <ul style="list-style-type: none"> • Similarly those generators helping grid by over injecting at low frequency needs to be incentivised. • Generator should not be given any discriminatory treatment than DISCOM. Moreover commission has not mentioned any specific reason for providing cap DSM rate only in respect of generator in SOR. • Hence this provision of CAP rate needs to be removed
10(E)	(E) Additional Charges for Deviation for under-injection of electricity, during a time-block in excess of the volume limit specified in Clause (C) of this Regulation when grid frequency is "49.70 Hz and above", by the generating stations regulated by the Commission using coal or lignite or gas supplied under Administered Price Mechanism (APM) as the fuel shall be at the rates specified in Table II of Annexure-II in accordance with the methodology specified in Clause (J) of this Regulation;	
10(J)	(J) The Additional Charges for Deviation of under-injection of electricity during the time-block in excess of the volume limit specified in Clause (C) of this Regulation, when the grid frequency is "49.70 Hz and above", by the generating stations whose tariff is determined or adopted by the Commission using coal or lignite or gas supplied under Administered Price Mechanism (APM) as the fuel shall be as specified by the Commission as a percentage of the Cap Rate or the Charges for Deviation corresponding to the grid frequency of the time block, or both with due consideration to the behaviour of the generating stations regulated by the Commission towards grid discipline:	

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10(G)	<p>(G) In addition to the Charges for Deviation as stipulated under Regulation 9 of these Regulations, Additional Charges for Deviation shall be applicable for over-drawal or under-injection of electricity when grid frequency is "below 49.70 Hz" in accordance with the methodology specified in Clause (I) of these Regulations".</p> <p>Provided that Additional Charges for Deviation for under-injection of electricity by a Seller, during the time-block when grid frequency is "below 49.70 Hz", by the generating stations whose tariff is determined or adopted by the Commission using coal or lignite or gas supplied under Administered Price Mechanism (APM) as the fuel in accordance with the methodology specified in Clause (J) of this Regulation shall be equivalent to 100% of the Cap Rate of main fuel (imported coal) as determined by the Commission for deviations.9[394.3] Paise/kWh.</p>	
9(A)(7)	<p>(7) The infirm power injected into the grid by a generating unit of a generating station during testing, prior to COD of the unit shall be paid at Charges for Deviation for infirm power injected into the grid, consequent to testing, for a period not exceeding six months or the extended time allowed by the Commission in the Maharashtra Electricity Regulatory Commission (Transmission Open Access) Regulations, 2016 and Maharashtra Electricity Regulatory Commission (Distribution Open Access) Regulations, 2016, as amended from time to time, subject to ceiling of Cap Rates</p>	<ul style="list-style-type: none"> • A sense of discipline or organised testing can be brought by encouraging injection of infirm power during identifying hours of the day. • With addition of large unit sizes, in-firm power (its injection and non-injection) can bring significant deviation in a vulnerable system. • The permission for injecting infirm power shall be given as far as possible during peak demand period i.e during day time. • The record of infirm power injected by generator with detail

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	<p>corresponding to the 3[main fuel] as determined by the Commission used for such injection are as specified below:</p> <table border="1" data-bbox="296 391 1140 824"> <tr> <td data-bbox="296 391 600 488">Domestic coal/ Lignite/Hydro</td> <td data-bbox="600 391 1140 488">[342.54] Paise/kWh sent out</td> </tr> <tr> <td data-bbox="296 488 600 727">APM gas as fuel</td> <td data-bbox="600 488 1140 727">[232.45]Paise/kWh sent out <i>up to the date of revision of price of APM gas by the Government of India and thereafter, at the rate to be notified by the Commission separately</i></td> </tr> <tr> <td data-bbox="296 727 600 776">Imported Coal</td> <td data-bbox="600 727 1140 776">[394.36]/kWh sent out</td> </tr> <tr> <td data-bbox="296 776 600 824">RLNG</td> <td data-bbox="600 776 1140 824">[705.37]/kWh sent out</td> </tr> </table>	Domestic coal/ Lignite/Hydro	[342.54] Paise/kWh sent out	APM gas as fuel	[232.45]Paise/kWh sent out <i>up to the date of revision of price of APM gas by the Government of India and thereafter, at the rate to be notified by the Commission separately</i>	Imported Coal	[394.36]/kWh sent out	RLNG	[705.37]/kWh sent out	<p>such as expected COD, permission given by SLDC, duration of infirm power injected etc shall be made available on SLDC website.</p> <ul style="list-style-type: none"> • Presently Infirm power is injected into the grid on prior permission of MLSDC with zero paisa by the generator. The infirm power injected into grid by generator prior to COD, will affect unscheduled interchange of state . Hence it is proposed that irrespective of type of fuel, cap for deviation charges shall be the lowest variable charges in respective month MOD stack.
Domestic coal/ Lignite/Hydro	[342.54] Paise/kWh sent out									
APM gas as fuel	[232.45]Paise/kWh sent out <i>up to the date of revision of price of APM gas by the Government of India and thereafter, at the rate to be notified by the Commission separately</i>									
Imported Coal	[394.36]/kWh sent out									
RLNG	[705.37]/kWh sent out									
11(1)	<p>Treatment of Infirm Power and Start Up Power Prior to COD No under-injection of electricity by a Seller shall be permissible when the grid frequency is "below 49.70 Hz" and no over-injection of electricity by a Seller shall be permissible when the grid frequency is "50.05 Hz and above".</p>									
11(2)	<p>Any infirm injection of power by a generating station prior to the COD of a unit during testing and commissioning activities shall be exempted from the volume limit as and when specified by the Commission for a period not exceeding six months or the extended time allowed by the Commission in accordance with the Maharashtra Electricity Regulatory Commission (Transmission Open Access)</p>									

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	Regulations, 2016 and Maharashtra Electricity Regulatory Commission (Distribution Open Access) Regulations, 2016 as amended from time to time.	
10(C)	<p>(C) The under-injection or over-injection of electricity by Seller shall not exceed the following when grid frequency is "49.70 Hz or above and below 50.05 Hz";</p> <p>i. 12% of the scheduled injection or [10] MW, whichever is lower for a Seller;</p> <p>Provided that in case schedule of a Seller, in a time block, is less than or equal to [40] MW, under-injection/over-injection in a time-block shall not exceed [5] MW, when grid frequency is "49.70 Hz or above and below 50.05 Hz".</p>	<p>The statement to be corrected as under:</p> <p><i>"No under injection of electricity by any seller shall be permissible when grid frequency is "below 49.70 Hz" and no over injection of electricity by any seller shall be permissible when grid frequency is "50.05 Hz and above".</i></p>
10(D)	<p>(D) In addition to the Charges for Deviation as stipulated under Regulation 9 of these Regulations, Additional Charges for Deviation shall be applicable for over-drawal as well as under-injection of electricity for each time block in excess of the volume limit specified in Clause (B) and (C) of this Regulation, when average grid frequency of the time block is "49.70 Hz and above" at the rates specified in Table I of Annexure-II in accordance with the methodology specified in Clause (H) of this regulation:</p>	<p>Necessity for review of 10MW limit for buyer</p> <ul style="list-style-type: none"> • Suppose of two DISCOM one having schedule of 85 MW & other 20,000 MW. • The DISCOM with low schedule, shall have to pay additional 100% DSM charges when its scheduling error exceed 12% above its allowable 12% deviation limit whereas DISCOM with high demand has to pay additional 100% DSM charges for exceeding when its scheduling error exceed 0.001% above allowable limit. • Additional deviation limit needs to be modified. It is proposed that in case of buyer/DISCOM this additional deviation limit

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		shall be on basis of peak demand
11(3)	Any drawal of power by a generating station prior to the COD of a unit for the start-up activities shall be exempted from the volume limit as and when specified by the Commission when the grid frequency is "49.70 Hz and above".	No exemption shall be given for power drawn from grid and DSM charges shall be applicable. The concerned generator can avail power from DISCOM
11(4)	Any drawal of power by a generating station prior to the COD of a unit for the start-up activities shall be exempted from the levy of Additional Charges for Deviation.	
12(1)	Framework for Operationalisation and Monitoring of Deviation Settlement Mechanism (1)The SLDC shall develop and publish on its website procedures and methodologies for the computation of Charges for Deviation and Additional Charges for Deviation for each state entity for crossing the volume limits specified for under-drawal/over-injection and for over-drawal and under-injection respectively.	Time frame shall be given to MSLDC for publishing procedures and methodologies for the computation of Charges for Deviation and Additional Charges for Deviation for each state entity. The time frame should not be more than a month from notifying DSM regulation by commission.
12(3)	The charges for over-drawal/under-injection and under-drawal/over-injection of electricity shall be computed by the SLDC in accordance with the methodology used for preparation of "State Energy Accounts."	The commission is requested to direct SLDC to prepared Monthly State Energy account on regular basis; failure to do so action under section 142 of Act shall be initiated for violation of commission directives.
13	State Energy Account (1) The SLDC shall prepare statement of State Energy Account for each time block for the Buyers and Sellers on monthly basis. Data required for the billing of partial open access consumers shall	

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	<p>be passed on to the billing centre of the distribution licensee by the SLDC. The billing centre of the distribution licensee shall be responsible for energy accounting, raising and settlement of bills with partial open access consumers. Payments of capacity and energy charges by the Buyers to the Sellers shall be as per the provisions in the respective Power Purchase Agreements or Agreement(s) with respect to transactions through power exchange and through Short Term Open Access, as the case may be.</p>	
13(3)	<p>The SLDC shall be responsible for preparation of weekly Deviation Charges statement to all pool participants and billing and collection of Deviation Charges from the pool participants in accordance with Regulation 12 of these Regulations. Provided that Provisional State Energy Account and Statement for Deviation Account Settlement should be available for scrutiny and verification by concerned State Entity for specified time period. The same would be finalised within stipulated time period upon addressing comments/discrepancies (if any) in time bound manner. Provided further that the State Energy Account and Deviation Account Statements shall be available for third party verification and audit on periodic basis and such third party verification and audit shall be carried out at least once a year.</p>	<ul style="list-style-type: none"> • All computations carried out by SLDC shall be open to all constituents for checking / verifications for a period of 15 days. If any mistake/omission is detected, the SLDC shall forthwith make a complete check and rectify the same. • The report of third party audit shall also available on SLDC website.
13(4)	<p>A detailed energy accounting procedure shall be prepared by the SLDC and submitted to the Commission for approval. Provided that, SLDC shall undertake stakeholder consultation by uploading the draft</p>	<p>All data used to energy accounting purpose shall be available on SLDC website</p>

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	procedure on SLDC's website before submission of procedure to the Commission for approval.	
14	<p>Compliance with the Instructions of State Load Despatch Centre</p> <p>Notwithstanding anything specified in these Regulations, the Sellers and the Buyers shall strictly follow the instructions of the SLDC on injection and drawal in the interest of grid security and grid discipline.</p>	In case of congestion warning issued by NLDC, if SLDC pass any instruction, then DISCOM/Seller supporting relieving congestion shall be exempted from congestion charges. Further additional DSM penalty for violating DSM limit shall be waived.
15(A)	<p>Accounting of Charges for Deviation</p> <p>(A) A statement of Charges for Deviations including Additional Charges for Deviation levied under these Regulations shall be prepared by the SLDC on weekly basis by the Thursday of the week and shall be issued to all constituents by next Tuesday, for seven-day period ending on the penultimate Sunday mid-night.</p>	<ul style="list-style-type: none"> • Deadline to be fixed and any delay in implementation from STU / SLDC end shall result in penal action • A proper mechanism is required to be incorporated in the Regulations for any delay in issue of such commercial bills for any reason.
16(A)	<p>16. (A) The payment of Charges for Deviation shall have a high priority and the concerned State Entity shall pay the indicated amount within 10 days of the issue of statement of Charges for Deviation including Additional Charges for Deviation by the SLDC into the "State Deviation Pool Account".</p> <p>(B) If payment against Charges for Deviation including Additional Charges for Deviation are delayed by more than two days, i.e., beyond 12 days from the date of issue of the statement by the SLDC, the defaulting State Entity shall pay simple Interest @ 0.04% for each day of delay.</p> <p>(C) All Payment to the entities entitled to receive any amount on</p>	<ul style="list-style-type: none"> • The interest collected from defaulting entity shall be paid to the constituents who had to receive the amount, payment of which got delayed. Persistent payment defaults, if any, shall be reported by the SLDC to the Member-Secretary of the Committee, for initiating remedial action.

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	account of Charges for Deviation shall be made within two working days of the receipt of payments in the "State Deviation Pool Account".	
17(B)	<p>The Maharashtra State Power Committee shall:</p> <ul style="list-style-type: none"> i. Co-ordinate and facilitate intra-state energy exchange for ensuring optimal utilisation of resources. ii. Monitor compliance of these Regulations by the State Entities and submit annual compliance report in the prescribed format within thirty days from close of financial year. iii. Guide the SLDC for modification of procedure(s) to address the implementation difficulties, if any. iv. Provide necessary support and advice to the Commission for suitable modifications/issuance of operating procedures, practice directions, and amendment to the provisions of this Regulation, as may be necessary upon due regulatory process. 	The Annual compliance report shall be made available on website of MSLDC