

**Before**

**UTTARAKHAND ELECTRICITY REGULATORY COMMISSION**

**Pet. No. 24 of 2021**

**In the Matter of:**

*Suo moto* proceeding for making consistent the time limits specified in clause (17), (18), (20), (21), (22), (24) & (27)(c) of Regulation 7.5 under Regulation 10.3 (Power to Remove of Difficulties) of UERC (State Grid Code) Regulations, 2016 and Regulation 8(7) under Regulation 16 (Power to Remove Difficulties) of UERC (Deviation Settlement Mechanism and Related Matters) Regulations, 2017 w.r.t. CERC (Indian Electricity Grid Code) Regulations, 2010 (IEGC) and CERC (Deviation Settlement Mechanism and related matters) Regulations, 2014 and amendments issued from time to time.

**And**

**In the Matter of:**

- (1) Managing Director,  
Uttarakhand Power Corporation Ltd. (UPCL),  
VCV Gabar Singh Urja Bhawan, Kanwali Road, Dehradun
- (2) Chief Engineer,  
State Load Dispatch Centre (SLDC),  
Vidyut Bhawan, Majra,  
Dehradun
- (3) Managing Director,  
Power Transmission Corporation of Uttarakhand Limited,  
'Vidyut Bhawan', Majra,  
Dehradun

**...Respondents**

**Coram**

**Shri D.P. Gairola      Member (Law)**

**Shri M.K.Jain         Member (Technical)**

**Date of Order: April 13, 2021**

This Order relates to the *Suo moto* proceeding for making consistent the time limits specified in clause (17), (18), (20), (21), (22), (24) & (27)(c) of Regulation 7.5 of UERC (State Grid Code) Regulations, 2016 (herein after referred to as "SGC") under Regulation 10.3 (Power to Remove Difficulties) of SGC and Regulation 8(7) of UERC (Deviation Settlement Mechanism and Related Matters) Regulations, 2017 (herein after referred to as "UERC DSM Regulations") under Regulation 16 (Power to Remove Difficulties) of UERC DSM Regulations w.r.t. CERC (Indian Electricity Grid Code) Regulations, 2010 (herein after referred to as "IEGC") and CERC (Deviation Settlement

Mechanism and related matters) Regulations, 2014 (herein after referred to as “CERC DSM Regulations”) and amendments issued from time to time.

### **Background**

2. The Commission vide its notification dated 19.12.2020 had issued UERC (State Grid Code) Regulation, 2016 vide which the scheduling and despatch procedure of power was specified at Regulation 7.5. The said Regulations were issued after incorporating the then prevailing provisions of the Regulations of CERC (Indian Electricity Grid Code) Regulations, 2010 consolidated upto July, 2016.
3. Earlier, in the IEGC at Regulation 6.5(16), 6.5(18), 6.5(18)(a), 6.5(19), 6.5(20), 6.5(23)(iii), revision in schedule was made effective from the 4<sup>th</sup> time block, counting the time block in which the revision is advised by the IEGC to be the first one. Accordingly, similar provisions were made in SGC at Regulation 7.5(17), 7.5(18), 7.5(20), 7.5(21), 7.5(22), 7.5(24) & 7.5(27)(c). However, later, CERC amended the 4<sup>th</sup> time block limit to 7<sup>th</sup> & 8<sup>th</sup> for odd & even time blocks in its sixth amendment of IEGC notified on 12.12.2019.
4. As a result of the aforesaid changes in time block limits, UPCL vide its letter dated 01.02.2021 raised its concern that due to alteration in the time limit for revision in schedule from 4<sup>th</sup> to 7<sup>th</sup> & 8<sup>th</sup> time block for odd & even time blocks respectively by NRLDC and delay on part of SLDC is resulting in acute difficulty in planning power requirements and scheduling & despatch of electricity, causing hindrance in accurate power management within the State. Besides above, UPCL vide its aforesaid letter has also highlighted following difficulties being faced by it in managing the power requirement (timely and correctly) of the State:
  - (1) Unreliable data source through SCADA at SLDC.
  - (2) Dependence on data from Delhi SLDC.
  - (3) Manual Data fetching and confirmation from the various S/s.
  - (4) Improper demand forecasting due to unreliable data.
5. The Commission took cognizance of the UPCL’s aforesaid letter and the issues highlighted therein and decided to hold a meeting with the officers of UPCL,

SLDC & PTCUL (SCADA) on 17.02.2021. Thereafter, the Commission issued Record Note of Meeting dated 17.02.2021 addressing the concerns of UPCL at para 6 as follows:

*“... Since, the intra-State power transaction have to be modified in accordance with the inter-State power transactions, so as to the limit the liability against deviation charges, therefore, it calls for amendment in the existing provisions of the State Grid Code Regulations, 2016 so as to make them in harmony with the provisions of Indian Electricity Grid Code Regulations, Secretary, UERC averred that in accordance with the provisions of Regulation 10.3 ‘Power to remove difficulties’ of UERC State Grid Code Regulations, 2016, the Commission may by general or specific order remove any such difficulty in order to make it consistent with the provisions of the Act.”*

**Commission’s Observations, Views & Directions:**

6. The Commission has observed that the existing provisions of Regulation 7.5 (17), (18), (20), (21), (22), (24), (27)(c) of SGC provide for revision in schedule from the 4<sup>th</sup> time block counting the time block in which the revision is advised by the IaSGS to be the first one.
7. Notwithstanding to the above, the Commission also observed that:
  - (1) Regulation 8(7) of UERC DSM Regulations provides that in the event sustained Deviation from schedule in one direction (positive or negative) by any State constituent i.e. buyer or seller shall have to make sign of their deviation from schedule changed, at least once, after every 12 time blocks.
  - (2) Regulation 3.5 of the State Grid Code provides for the constitutions of a Grid Coordination Committee (GCC) who is responsible for review of the State Grid Code/amendment in the State Grid Code and also responsible for ensuring that the changes/modifications proposed in the State Grid Code are consistent and compatible with the IEGC. However, GCC has not brought any proposal for review/revision in any of the provisions of SGC for making the same consistent with the amendments made in IEGC and other relevant Regulations of CERC since the date of notification of SGC.

8. The Commission also observed that the CERC has made changes in its Regulations pertaining to the above provisions vide various amendments from time to time as under:

(1) Para 2.4 of CERC (Indian Electricity Grid Code) (Sixth Amendment) Regulations, 2019 specifies that:

*“2.4 The clause (18) of Regulation 6.5 of Part 6 of the Principal Regulations, shall be substituted as under:*

*“18. Revision of declared capability by the ISGS(s) having two part tariff with capacity charge and energy charge and requisition by beneficiary (ies) for the remaining period of the day shall also be permitted with advance notice. Any revision in schedule made in odd time blocks shall become effective from 7<sup>th</sup> time block and any revision in schedule made in even time blocks shall become effective from 8<sup>th</sup> time block, counting the time block in which the request for revision has been received by the RLDCs to be the first one.*

**Note:** *Odd Time blocks referred in this clause, are the Time blocks 00:00 to 00:15, 00:30 to 00:45, 01:00 to 01:15 and so on. Even Time blocks referred in this clause, are the Time blocks 00:15 to 00:30, 00:45: 01:00, and 01:15 to 01:30 and so on.*

**Illustration:**

*If a request for revision in schedule or declared capability has been made in Time block 17:00 to 17:15 (odd Time block) of a day D, it shall be effective from Time block 18:30 to 18:45 of the day D (7<sup>th</sup> Time block from the Time block in which the request for revision was made). Similarly, if a request for revision in schedule or declared capability has been made in Time block 17:15 to 17:30 (even Time block) of a day D, it shall be effective from Time block 19:00 to 19:15 of the day (D) (8<sup>th</sup> Time block from the Time block in which request of revision was made).”*

(2) Further, in the event of sustained Deviation, the earlier time limit of sign reversal of 12 time blocks have been amended to 6 time blocks as per amended Regulation 7(10)(b) in its CERC (Deviation Settlement

Mechanism and related matters) (5<sup>th</sup> amendment) Regulations, 2019 from 01.04.2020 attracting a hefty additional charges for violations.

9. Considering the above-mentioned amendments, *prima-facie* it becomes imperative to amend SGC and UERC DSM Regulations inline with CERC amendments from time to time. However, it would be essential to understand the intent of the CERC amended Regulations and its financial implications on the State constituents:

- (1) The main intent of the CERC Regulations on Scheduling & Despatch and Deviation Charges are focused towards reducing the events of sustained Deviation and therefore, a hefty penalty on non-compliance w.r.t. change in sign reversal has been introduced. Moreover, the time limit for sustained Deviation has been reduced to 6 time blocks from 12 time blocks in accordance with CERC DSM Regulations (5<sup>th</sup> Amendment). In order to ensure that the minimum deviation charges and additional deviation charges are paid on account of sustained Deviations for more than 6 time blocks, it is important to have a quick data acquisition, analysis, response & load shedding logics implementation at SLDC's and UPCL's end for reducing such instances of sustained Deviations or at least break the chain of sustained Deviation of 6 time blocks should be the utmost endeavour.
- (2) Further, amending the existing time limits from 4<sup>th</sup> to 7<sup>th</sup>/8<sup>th</sup> time block for odd/even time blocks respectively in SGC would pass on the deviation charges for the 4<sup>th</sup> to 6<sup>th</sup> time block in addition to the deviation charges of 1<sup>st</sup> to 3<sup>rd</sup> time blocks on the IaSGS i.e. intra-State generator and would to some extent reduce the deviation charges liability on the State discom i.e. UPCL. Whereas, the larger issue is the sustained Deviation of consecutive 6 time blocks which attracts substantial penalty at inter-State point as per CERC DSM Regulations. In the interest of the State Power Sector, it is critically important to reduce such instances of sustained Deviation of more than consecutive 6 time blocks.

10. From the above, the Commission is of the view that for harmonising the State Grid Code with the IEGC, it is imperative to make changes in the relevant Regulations of SGC and UERC DSM Regulations as follows:
- (1) The time limits from 4<sup>th</sup> time block to 7<sup>th</sup> and 8<sup>th</sup> for odd & even time blocks for revision of scheduled amendment in Regulations 7.5 (17), (18), (20), (21), (22), (24), (27)(c) of the SGC. Therefore, the Commission in exercise of its power under Regulation 10.3 (Power to Remove Difficulties) of SGC **directs that the time limits from 4<sup>th</sup> time block provided in the SGC be read as 7<sup>th</sup> time block for odd time blocks and any revision in schedule made in even time blocks shall become effective from 8<sup>th</sup> time block as provided in the IEGC [detailed at point No. 8(1) above] till amendments in the SGC are notified.**
  - (2) Further, as per para 9(1) above, to align the given time limit of sustained Deviation from schedule in one direction (positive or negative) at Regulation 8(7) of UERC DSM Regulations in accordance with the CERC DSM Regulations, the Commission in exercise of its power under Regulation 16 of UERC DSM Regulations **directs that the time limit for making change in sign of Deviation from the Schedule shall be read as 6 time block in place of 12 time block.**
11. With regard to recommendation/proposal for amending the regulations of SGC as per para 7 above, **the Commission directs the Chairman [Director of STU i.e. Director (Projects) PTCUL] of GCC to convene a meeting within a month from the date of issuance of this Order for review/revision of the provisions of the Regulations of SGC in order to make it consistent with the prevailing IEGC Regulations and submit its recommendation for amendment in SGC and other relevant Regulations/documents viz. UERC DSM Regulations.**

The matter hereby stands disposed.

Ordered accordingly.

**(M.K. Jain)**  
Member (Technical)

**(D.P. Gairola)**  
Member (Law)