

**Government of India
Central Electricity Authority
Room No. 302, North Wing
Sewa Bhawan, R.K. Puram
New Delhi – 110066**

No.CE(SP&PA)/Misc./09/CEA/

Dated : 8th March, 2010

Shri Alok Kumar
Secretary,
Central Electricity Regulatory Commission
3rd floor, Chanderlok Building
36, Janpath, Connaught Place
New Delhi – 110 001

Subject : Comments on draft Indian Electricity Grid Code proposed to be enforced
from 1.4.2010.

Sir,

Comments of Central Electricity Authority on Indian Electricity Grid Code
proposed to be enforced from 1.4.2010 are enclosed as per Annexure for your kind
perusal.

Yours faithfully,

Encl : As above.

(Ravinder)
Chief Engineer (SP&PA)

Central Electricity Authority

Comments on draft Indian Electricity Grid Code

1. Planning Philosophy (Chapter 3, Clause 3.4, item (b))

It is stated that the CTU shall carry out planning process from time to time as per the requirement for identification of **major** inter-state transmission system It is pointed out that CTU is required to carry out the planning process for all ISTS schemes. Accordingly, the word “major” may please be deleted. Further, system strengthening schemes also need to be covered in the planning process of CTU. Accordingly it is suggested that para 3.4 (b) may be reworded as follows :

“The CTU shall carry out planning process from time to time as per the requirement for identification of Inter-State Transmission System including regional and inter-regional system strengthening schemes which shall fit in with the perspective plan developed by CEA. While planning schemes, the following shall be considered in addition to the data of authenticated nature collected from and in consultation with users by CTU:

- i) Perspective plan formulated by CEA.*
- ii) Electric Power Survey of India published by the CEA.*
- iii) Transmission Planning Criteria and guidelines issued by the CEA*
- iv) Operational feedback from NLDC*
- v) Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-state Transmission and related matters) Regulations ,2009.”*

2. Clause 3.4(c)

It does not appear appropriate to specify under a separate clause that transmission system shall be planned in accordance with CERC long term and medium term regulations. Therefore it is suggested to delete this aspect as independent clause and to cover it under para 3.4(b) (v) as indicated above.

3. Clause 3.5(a) (i)(a)

The following may be added :

“- Outage of 400 kV S/C line with series compensation.”

The last item i.e. “- Outage of 765 kV S/C line “ may be rephrased as, “- Outage of 765 kV S/C line without series compensation.”

5. **Clause 6.4 item 2(b) - Ultra Mega Power Project.**

The meaning of Ultra Mega Power Project is not clear since the same has not been ascribed any meaning under definitions. Ultra Mega Power Project is also not defined in the Electricity Act and CERC regulations on long term and medium term access. Therefore, it is necessary to clearly define the meaning of Ultra Mega Power Project.

6. **Clause 6.4 item 2(c) (iii)- Control jurisdiction**

It is proposed that if a generating station is connected to both ISTS and the State network, scheduling, despatch, energy accounting etc shall be done by RLDC or SLDC and could be changed from time to time. This does not appear to be a practical proposition. In this context it would also be pertinent to add that for the purpose of start up power many generating stations get connected to the State network. Further, it is to be noted that a generating station may not be able to tie up long term PPA within the home state or even with outside states and may operate as a merchant plant supplying power on medium term and short term contracts. Such a station is essentially an inter-state generation station and should fall in the control area of RLDC. From a legal perspective any generating station which is connected to ISTS only or both to ISTS and STU system can be brought under the control jurisdiction of RLDC. From a practical perspective it may be kept in view that SLDCs still lack independence and institutional capacity for doing real time energy accounting, installing special energy meters, etc. and in most of the states intra state ABT mechanism has not been put in place. If the proposal is implemented many new inter state generating stations of IPPs may face hurdles in obtaining open access from the SLDCs. Therefore, it would not be desirable to push inter-state generating stations having connectivity with ISTS as well as STU in to the control jurisdiction of SLDC for the sake of reducing the work load of RLDCs.

3. **Regulation 6.5 item 19 – Forced Outages**

In case of a forced outage all generating stations irrespective of their nature of PPA, whether long term, medium term or short term, should be allowed to revise their schedule with the exception of schedules for day ahead collective transactions cleared through a power exchange. If large number of generating stations supplying power under long term, medium term and short term bilateral contracts are not allowed to revise their schedule under forced outage, it may result in serious grid imbalances.