ATRIA POWER

6/3/2020

Ref No. AWPPL/2019-20/001

Date: 4th March 2020

To,

The Commission Secretary,
Andhra Pradesh Electricity Regulatory Commission (APERC),
11-4-660, 4th Floor,
Singareni Bhavani, Red Hills,
Hyderabad – 500 004.

Subject: Comments/suggestions on "APTRANSCO- Regulation 4 of 2017 for Forecasting, Scheduling and Deviation Settlement of Solar and Wind generators- Issuing of suitable Amendments to Regulation by APERC"

Ref:

1. **APTRANSCO letter no. CGM/HRD&Plg/SE/Plg/EE/RAC&Reforms/APERC/ D.No/21/2019 dated 10.12.2019**
2. **APERC public notice dated 13.02.2020**

Dear Sir,

This is with reference to your office notice referred at serial no. 2 above vide which APERC has invited comments/suggestions/objections from all the affected parties in reference to the subject cited amendment in Forecasting, Scheduling and Deviation Settlement of Solar and Wind Regulation, 2017.

06/03

In this matter, please find enclosed comments/suggestions/objections (Annexure I) from our end which we found relevant for the purpose of amendment/ in the original regulations

It is requested to consider the detailed points while finalizing the subject cited amendment.

Thanking You,
Yours Sincerely,

Authorized Signatory
Atria Wind Power Private Limited

Encl: Annexure I

ATRIA WIND POWER PRIVATE LIMITED
Regd. & Corporate Office Atria Power: 1st Floor, No.11, Commissariat Road, Bengaluru - 560025
Ph.: +91-80-080-49411411 | Fax: +91-80-080-49411499
CIN : U40108KA2014PTC074201 | www.atriapower.com | info@atriapower.com

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Annexure I

Amendment No.	Original Clause	Proposed amendment	Comments
Amendment No. 1	2.1 (a)'Absolute Error' means the absolute value of the error in the actual injection of wind or solar generators with reference to the scheduled generation and the 'Available Capacity' (AvC), as calculated using the following formula for each fifteen (15) minute time block: Absolute Error (%) = 100 X [Actual Injection – Scheduled Generation] / (AvC) ;	'Forecast Error' means the absolute value of the error in the actual injection of wind or solar generators with reference to the scheduled generation , as calculated using the following formula for each fifteen (15) minute time block: Forecast Error (%) = 100 X [Scheduled Generation-Actual Injection] / Scheduled Generation ;	Neighbouring states like Karnataka and Tamil Nadu are following 'Absolute Error' rather than 'Forecast Error'which will reduce the allowable window of deviation as allowed by CERC. The allowable window of deviation by CERC was considered taking into account forecasting tools which are not much accurate with their results. Any reduction in allowable window of deviation is suggesting that APTRANSCO is passing on its duties for Grid Management to the Renewable Generators.
Amendment No. 2	2 (j)'deviation' in a time-block for a seller means its total actual injection minus its total scheduled generation:	'Allowable Forecast Error' in percentage shall be included; Allowable Forecast Error= 100 X (diversity factor in control area in the beginning of FY) X (quantum of deviation limit permitted under CERC's DSM Regulation)/ (quantum of VRE installed capacity)	Installed capacity in Renewable generation for neighboring states is as below, 1. Tamil Nadu- 12179 MW 2. Karnataka- 14870 MW As mentioned in the justification, at any point of time there will not be 15% forecast error with all the sources of Renewable Energy. All the contingency shortfall/surplus requirements can be met by the RTM regulation, SCED regulation and Power Exchanges. Incase of Renewable Generation, System Operators have to take benefit from the latest market practices by working closely with other neighbouring states and Power trading companies.
Amendment No. 3	4.1 The methodology for day-ahead scheduling of wind and solar energy generating stations which are connected to the Grid and re-scheduling them on one and half hourly basis, and the methodology of handling deviations of such wind and solar energy generating stations shall be as stated hereunder and accordingly Forecasting Tools shall be provided by the generator concerned.	It is proposed to remove the option of rescheduling of forecast on one and half hourly basis during the day of operation and strictly adhere to the scheduling on Day Ahead basis.	It seems amazing that on one hand System Operator is referring that the accurate forecasting for Renewable sources is not possible because of which they are facing issues in Grid Management and on the other hand they want to take away the right of revision in schdule as per IEGC and APERC Grid Code. Simultaneously, System operator is self sufficient in maintaing Grid discipline not only by controlling generation but also through Demand Management.
Amendment No. 4	6.3 In the event of actual injection of a generating station or a pooling station, as the case may be, being less or more than the scheduled generation, the deviation charges for shortfall or excess generation shall be payable by the Wind or Solar generator or QCA as per table.	DSM charge shall be as follows, < Allowable Forecast Error- None >Allowable Forecast Error- INR 2/kWh for shortfall or Over Injection	Rightnow all the Renewable Energy assets are under huge stress because of the poor recovery from their beneficiaries and the ongoing pressure from the lenders.The cost of DSM works out to be the operational cost for Renewable Generators for which every generator works on for keeping it as low as possible. Also, the whole purpose of DSM charges is not to make benefits or compensation for loss but to maintain Grid Discipline, which seems lacking in the justification given by System Operator.