



ANDHRA PRADESH ELECTRICITY REGULATORY COMMISSION

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From
The Commission Secretary,
APERC,
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Email: commn-secy@aperc.in,

To
The Chief Engineer,
APSLDC, AP Transco,
Vidyut Soudha,
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Lr.No. APERC/JD(PPP)/DD(PPP)/F.E-545 /D.No.334 /2020. Dt. 30.07.2020.

Sub: APERC – Amendments proposed to APERC Forecasting, Scheduling and Deviation Settlement of Solar and Wind Generating Sources Regulation, 2017 (Regulation No.4 of 2017) – Certain Information – Called for – Reg

Ref: O.P. 2 of 2020.

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The hearing in the referred Original Petition on the subject matter is completed and the matter is reserved for Orders. In this regard, while perusing the record the following objections from the developers, among others, are observed.

- a. The “detailed report” enclosed to the letter dated 10.12.2019 seeking amendments does not provide adequate data on the basis of which the amendments are proposed and accordingly requested the Commission to require APSLDC to provide justification backed by evidence from forecasting & scheduling data to arrive at such changes.
- b. On the statement that 15% error will result in a deviation of 1125 MW in AP, a detailed, factual analysis to determine if deviation from VRE sources at any time was equal to or more than 1125 MW at the State level was sought since APSLDC will have data of the entire State since July, 2018.
- c. Only a full analysis of the accuracy of demand and supply forecasting will enable making an informed decision regarding cost of deviation from Variable Renewable Energy, and changes, if any need to be made in the Regulations.
- d. Any change in the allowable error or the formula should be based on a rigorous study of existing data from implementation of Forecasting &

Scheduling since 2017. The study can also highlight if there is a need to have different allowable errors for new and old renewable energy generators.

- e. Till such time the SLDC does not produce credible data that it has with all earnest, fulfill its responsibility as required under the extant Regulations, it cannot propose any amendment which is detrimental to the interest of wind and solar generators.

2. On perusal of the replies furnished by the APSLDC, vide letter dated 11.05.2020, to the objections, it is observed that neither any reply is furnished to the above objections nor any data is attempted to be furnished.

3. As such, and particularly in view of the statement in the detailed report that, “all the above issues (i.e. the issues that purportedly led to the necessity of the proposed amendments) have surfaced during implementation of provisions of Regulation 4 of 2017 and the said issues are being encountered by the grid operator in real time operation of grid”, I am directed to seek the following information, justifying the amendments proposed, to be submitted within 15 days from the date of receipt of this letter:

- a. All the relevant and necessary data (soft copies of 15 min. block wise data) available since the date the Regulation 4 of 2017 came into effect, to conclusively demonstrate the necessity of the proposed amendment-1 i.e. Change of Formula of Absolute Error which sought to be amended on the reason that by dividing the deviation with available capacity, the error becomes infinitesimal and the regulation becomes redundant and that any deviation of day-ahead forecast in VRE generation is a burden to the utility.
- b. All the relevant and necessary data (soft copies of 15 min. block wise data) available since the date the Regulation 4 of 2017 came into effect, in support of the submissions made for the proposed Amendment-2 that the deviation of maximum allowable quantum of 1125 MW variation in downward direction will result in overdrawl from grid beyond the permissible limits and in that event it would lead to load shedding in real time operation of grid.
- c. All the relevant and necessary data available since the date the Regulation 4 of 2017 came into effect, in support of the claim that DISCOMs are not able to cope up with the deficit / surplus arising due to variation in VRE Generation in real time operation based on which claim the provision for intra-day revision of schedules is sought to be withdrawn, vide the proposed Amendment-3.

- d. All the relevant, necessary data since the date the Regulation 4 of 2017 came into effect in support of the claim that during the real time operation of Grid, huge variation occurs between the forecast schedules and actual generation and that due to error in forecast of RE Generation, DISCOMs are resorting to purchase high cost power from power exchanges and accordingly the deviation charges are sought to be revised to Rs.2 per unit, vide the proposed Amendment-4.
- e. All the relevant, necessary data since the date the Regulation 4 of 2017 came into effect in support of the claim that indiscipline to the grid caused by few generators is shared and spread over among all generators in the virtual pool and accordingly the virtual pool provision is sought to be deleted, vide Amendment-5.
4. Adverse inference will be drawn for failing to furnish the data / information substantiating your proposed amendments and the matter will be decided based on the information already available on record.

(BY ORDER OF THE COMMISSION)


Commission Secretary_(i/c)