<u>Statement of Reasons for Uttar Pradesh Electricity Regulatory Commission</u> (Forecasting, Scheduling, Deviation Settlement and Related Matters of Solar and Wind Generation Sources) Regulations, 2018.

The Commission initiated Suo moto hearing in the matter to bring Solar, Wind and Other Renewable Generators under ABT regime and to formulate Forecasting and Scheduling Regulations.

The hearing was held on 8/02/2018 and it was decided that the proposed draft regulations with suggested changes in clause 3(2)(a) and clause 8 shall be placed on website for public comments.

The draft along with suggested changes was placed on UPERC website and public notice was published in one Hindi and one English daily newspaper namely Hindustan and Hindustan Times on 14/3/2018. All stake holders were requested to submit their comments by 6/04/2018.

The public hearing was held on 13/07/2018. The following stakeholders attended the public hearing.

List of Attendants

- 1. Shri Niraj Agrawal, Chief Engineer, RAU UPPCL
- 2. Shri Akhilesh Kumar Singh, Chief Engineer, C&S UP SLDC
- 3. Shri C.K. Shukla, Chief Engineer, PSO UPSLDC
- 4. Shri P. Shukla, SE UPSLDC
- 5. Shri M.K. Gupta, EE UPSLDC
- 6. Shri Avadesh Kumar Verma, President Uttar Pradesh Rajya Vidyut Upbhokta Parishad
- 7. Shri Rama Shankar Awasthi
- 8. Shri Himanshu Bhatnagar, Shree Cement Limited
- 9. Shri Vineet Kumar rai, Manikaran Power Limited
- 10. Shri Vrushabh Ganatra, Manikaran Power Limited
- 11. Shri Madhusudan Gulati, FIE Chartered Engineer
- 12. Ms. Soumya Maiti, AMPLUS Solar

During the public hearing the following submitted their comments

- 1. Hero future energies Pvt. Ltd has suggested to keep the penalty as Rs. 0.25, Rs. 0.50 and Rs. 0.75 per unit for respective range of deviation.
- 2. Amplus Green Power Pvt. Ltd. suggested as follows:
  - a. separate scheduling by QCA for wind and solar
  - b. Telemetry data should be at the turbine / invertor of plant level with commercial impact on account of deviation shall be borne by QCA or generator.
  - c. Virtual pooling station
  - d. Change in definition of Gaming.
- 3. National Solar Energy Federation suggested as follows:
  - a. Penalty should be on % basis.
  - b. Instead of independent generator the variation should be considered on State basis
  - c. Scheduling should be provided as per the scheduling of thermal power.

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- 4. Chief Engineer, UPSLDC suggested that some penalty may be imposed on the plants for not submitting the telemetry data
- 5. The public representatives Shri Rama Shankar Awasthi and Shri Avadhesh Kumar Verma submitted that the penalty should be on percentage basis instead of absolute basis.

As NTPC is operating solar power plants for a very long time. suggestion for forecasting for Solar and Wind based on actual operating exposure was sought.

The summary of data from 1<sup>st</sup> une18 to 30<sup>th</sup> June 18 submitted by NTPC is as follows:

Error in Time blocks	Singrauli Solar Power Plant. No. of time blocks where availability is given	% of total time blocks	Unchahar Solar Power Plant. No. of time blocks where availability is given	% of total time blocks	Dadri Solar Power Plant. No. of time blocks where availabili ty is given	% of total time blocks
<15%	2872	88.58	2876	91.66	2874	91.85
>15%<25%	235	7.26	191	6.09	173	5.53
>25%<35%	95	2.93	52	1.68	59	1.89
>35%	40	1.23	18	0.57	23	0.73

Accordingly, the table below provides the details on the amendments proposed to the Draft Regulation alongwith the comments received from the various stakeholders.

SI No	Stakeholders' Submission	Commission's Viewpoint				
1 2	II Hero future energies Pvt. Ltd has suggested to keep the penalty as Rs. 0.25, Rs. 0.50 and Rs. 0.75 per unit for respective range of deviation. Amplus Green Power Pvt. Ltd. a. separate scheduling by QCA for wind and solar b. Telemetry data should be at the turbine / invertor of plant level with commercial impact on account deviation shall be borne by QCA or generator.	III The penalty shall be on percentage terms as there is wide variation between the fixed rates for different solar generators having PPA with the Discoms a. The Commission accepts the suggestion and provides for separate QCA for Solar and Wind generators b. The Commission accepts the suggestion and provides for the same c. The Commission does not find any ground for change.				

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c. Virtual pooling station	
<ul><li>c. Virtual pooling station</li><li>d. Change in definition of Gaming.</li></ul>	<ul> <li>The definition of Gaming has been taken from model Regulations of FOR and has been provided in the similar Regulations of various States</li> </ul>
<ul> <li>National Solar Energy Federation <ul> <li>Penalty should be on % basis.</li> </ul> </li> <li>Instead of independent generator the variation should be considered on State basis</li> <li>Scheduling shall be provided as per the thermal generator.</li> </ul>	<ul> <li>a. The Commission accepts the suggestion. The penalty shall be on percentage terms as there is wide variation between the fixed rates for different solar generators having PPA with the Discoms</li> <li>b. The Commission does not find any ground as UP is large state and the weather variations are not similar across the State.</li> <li>c. The Commission does not find any ground as thermal generator provide RTC power as and when required by the buyer whereas the power generated by solar and wind are nature dependent and do not provide RTC power so they cannot be provided similar benefits</li> </ul>
Chief Engineer, UPSLDC suggested that some penalty may be imposed on the plants not submitting the telemetry data	The Commission accepts the suggestion. The same has been provided in the Regulations
The public representatives Shri Rama Shankar Awasthi submitted that the penalty should be on percentage basis instead of on absolute basis.	The Commission accepts the suggestion. The penalty shall be on percentage terms as there is wide variation between the fixed rates for different solar generators having PPA with the Discoms
The public representatives Shri Avadhesh Kumar Verma submitted that the penalty should be on percentage basis instead of on absolute basis	The Commission accepts the suggestion. The penalty shall be on percentage terms as there is wide variation between the fixed rates for different solar generators having PPA with the Discoms
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(Kaushal Kishore Sharma) Member Place: Lucknow

(Suresh Kumar Agrawal) Member

(Raj Pratap Singh) Chairman

Dated: 28.12.2018

