



APSEB ASSISTANT EXECUTIVE ENGINEERS' ASSOCIATION

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6/3/2020

To
The Commission Secretary,
APERC,
Red Hills,
Hyderabad.

6/3/2020
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Vijayawada,
Dt: 04-03-2020.

Respected Sir,

Sub: - APSEBAEEA – Views/Suggestions on the “Regulation 4 of 2017 for Forecasting, Scheduling & deviation Settlement of Solar and Wind Generators” – Submitted – Regarding.

Ref: Regulation 4 of 2017 issued by Hon’ble APERC.

As per the reference to the public notice dated on 13.02.2020, APSEB Assistant Executive Engineers Association wishes to bring some suggestions on the matter of Forecasting, Scheduling & Deviation Settlement of Solar and Wind Generators.

APTRANSCO proposed various amendments to the regulation 4 of 2017, in that, the term “Absolute Error” must be substituted by “Forecast Error” and in the formula, AVC has been replaced with Scheduled generation for calculation of the error. This may be approved as scheduled generation will give more accuracy than AVC.

And allowable forecast error shown as 4.89% with 0.7 diversity factor. But it will be 2.39% with the given inputs. And diversity factor can be considered as 1 instead of 0.7 and the Hon’ble CERC allows a deviation limit of only + 250 MW for RE rich states then allowable forecast error will be 3.42%. So, the forecast error may be set in the range of 3.42% to 5% as requested by APTRANSCO.

APTRANSCO proposed deviation charges Rs.2/- per kWh for excess or shortfall from the scheduled energy. In this regard, it may be consider that, to accommodate VRE generation all the state owned thermal power plants are running at their technical minimum load. In case of excess generation than scheduled further back down of thermal plants is not possible so, it is advised to go for the back down of VRE even they have must run status in view of grid stability. And the proposed balancing cost of 40 paisa per unit shall be given to the thermal generators which are backed down to accommodate VRE. From the FY: 2016-17 onwards, the APGENCO Thermal Power Plants were backed down in order to accommodate VRE. Hence, that shortfall of generation caused due to back down of units shall be compensated by the balancing cost.

In case of shortfall of the scheduled energy, the deviation charges levied by SLDC shall be as per the actual rate of power purchase in the market instead of Rs.2/- per unit.

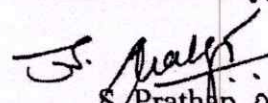
APTRANSCO proposed the amendment, for the clause 4.1 of regulation 4 of 2017, to remove the option of rescheduling of forecast on one and half hourly basis during the day of operation and strictly adhere to scheduling on day ahead basis. This may be approved as it gives convenience to maintain grid discipline and security. Further, it avoids violation notices by SRLDC and to avoid unscheduled load shedding.

APTRANSCO proposed an amendment for removal of "Virtual Pooling" phrase from Regulation 4 of 2017 for improving accurate forecasting and scheduling of VRE generators. By de-pooling of VRE generators, the deviation between the forecasted schedules and actuals of generators will get minimised. Further, the individual VRE generator will schedule their generation accurately then there is no need of QCA which acts as a virtual LDC for VRE generators.

Hence, APSEBAEEA is requesting the Hon'ble commission to consider the views and give approval for amendments proposed by the APTRANSCO to the Regulation 4 of 2017 for Forecasting, Scheduling and Deviation Settlement of Solar and Wind Generators in the larger public interest.

Thanking You Sir,

Yours sincerely,


S. Prathap 04/03/2020

Technical Secretary
APSEBAEEA