

Background Paper

1. The Hon'ble Commission has introduced the final Regulation on 01.03.2019 which is titled as "Forecasting, Scheduling and Deviation Settlement Mechanism (DSM) Regulations 2019" which were published in the TN Government Gazette on 20.03.2019.
2. Subsequent to the same, members are aware that the Hon'ble Commission has also issued the '*Procedure for implementation of Forecasting, Scheduling, Deviation Settlement for Wind and Solar*' and '*Procedure for Deviation Settlement for all other entities*' in the Commission's Lr. No. TNERC/DE/DDEI/F.DSM Procedure/D. No. 915 /20 on 03.10.2020 and accordingly, made the Regulations to come for enforcement in the State of Tamilnadu with effect from 03.10.2020.
3. Based on the same, the CE-NCES has issued a letter to appoint the QCA before 30.11.2020, by his letter No.L13/AEE-AMR/F.AMR/D.965/20 dated 19.11.2020. Since, the CE NCES was not the authority under the Forecasting, Scheduling and DSM Regulations 2019, for Wind and Solar, heavy objection was raised by various stakeholders in having issued such a letter without understanding the *locus standi* available to CE-NCES.
4. Thereafter, on such objections filed by various stakeholders, the matter of appointment of QCA was shifted from CE-NCES to SLDC and accordingly, the SLDC has issued a letter on 30.11.2020, informing the need to appoint QCAs and however, without any time line.
5. In the above scenario, the SLDC has subsequently informed through its portal, the availability of the details of all Pooling Stations in the State of Tamilnadu and accordingly, further opened a window through the below link, in the matter of appointment of QCA. <http://tneblcdc.org:8080/tnqca>
6. With all these backgrounds, Associations have started raising issues before the Hon'ble Commission, in the manner the 2019 Regulation was attempted to be implemented in the State and accordingly, the Chairman of Hon'ble TNERC has convened a meeting of all stakeholders including their Associations on 18.02.2021 at Coimbatore and accordingly, the matter was deliberated exhaustively. At the end of the meeting, the following decisions were agreed.

7. Key Points of the stakeholders' meeting with Hon'ble Commission:

A) WEGs without AMR / SCADA creating concerns in Forecasting:

- Out of 9780 WEG Service Connections, so far 1217 WEGs are yet to be connected with AMR facility. In the absence of non-availability of AMR facility, to the extent of 12.44% WEGs, taking forward the implementation of 2019 Regulations, would be difficult to assess data. When the matter was represented properly, the Hon'ble

Commission understood the crux involved in it. Accordingly, the Hon'ble Commission has directed the TANGEDCO as below.

8. The Commission is not happy to note that the provision of AMR meter in around 1200 WEGs and more than 100 feeders in pooling stations is still pending for a long time which are pre-requisite for centralised scheduling and monitoring on real time basis efficiently.

The CMD/TANGEDCO shall be addressed to expedite provision of AMR meters in all remaining WEGs and feeders of pooling stations.

B) Forecasting to be done State as a Single Unit and not Pooling Substation Wise:

- The Hon'ble Commission conceded over the practical difficulties explained and complications involved with so much of data in the process and felt that the forecasting for all the WEGs as a whole for the State would be better option, in view of the fact that the forecast being given to the SLDC so far from a single agency has been working well. Accordingly, it was decided as below.

*All the WEG stakeholders could nominate a single forecaster/QCA and the single QCA so nominated would provide aggregate Forecasting and Scheduling for the State as a whole. It was unanimously decided to carry out the State wide forecasting for all WEGs on a trial basis for one year by engaging the services of **M/s. Leap Green Energy Private Limited** for wind power. SLDC shall be forecasting the solar power on their own. The feedback required for improving the accuracy of the forecasting shall be provided from SLDC to the Forecaster with consistent coordination between them.*

- Accordingly, the Forecasting and Scheduling would be done for the State as a whole and there is no need to nominate any Qualified Coordinating Agency (QCA) for individual Pooling Substation Wise. This would be a great relief to WEGs.

C) Trial Forecasting before actual implementation of the Regulation:

- Further, it was decided to have a Trial Forecasting for a period of one year commencing from 10.03.2021 onwards and however, by covering a full wind period.
- It is therefore now open to M/s. Leap Green Energy Private Limited to convene a meeting with all the stakeholders and after receiving opinions and inputs, it has to take up the matter with the SLDC,

requesting the SLDC to provide necessary data to be shared for improving the accuracy of the Forecasting and Scheduling.

- Tasma expects that *M/s. Leap Green Energy Private Limited* would be convening a meeting of the stakeholders shortly, to take forward the Trial Forecasting for next levels, without any loss of time. Since the services of *M/s. Leap Green Energy Private Limited* are retained for the purpose of Trial Forecasting, as a single QCA for the entire State, now the individual WEGs are not obligated to appoint any individual QCA, on Pooling Substation Wise, as was placed in the 2019 Regulations. Therefore, the already proposed requirement on appointment of QCA would be kept in abeyance.
- Accordingly, the present data from AMR from the WEG meter and feeder meter will be shared and made available for the Trial Forecasting and Scheduling on a real time basis. If required, the TANGEDCO / SLDC may collect necessary charges for sharing the data. This makes no additional investments to create SCADA system by WEGs wherever it is not available now.

D) Deviation Percentage:

- The Hon'ble Commission advised to calculate the deviation percentage during the Trial Forecasting period, by the following two different methods and to report the same during the Trial Forecasting period for further analysis and to take a decision.

1. $(\text{Scheduled Power} - \text{Actual Power}) / \text{Available Capacity} \times 100$
2. $(\text{Schedule Power} - \text{Actual Power}) / \text{Schedule Power} \times 100$

Based on the same, suitable formula would be arrived for fixing the final deviation percentage, after discussing with the stakeholders.

E) Security Deposit:

- Regarding the payment of Security Deposit of Rs. 50,000/MW and in respect of all other issues, the Hon'ble Chairman assured that such issues would be sorted out during next rounds of discussions.

F) RE Power Curtailment:

- On the concern expressed by the stakeholders, on the wind power curtailment, the Hon'ble Chairman assured that the same would be checked with the SLDC and a proper system with a protocol would be framed to carry out the curtailment of RE Power and the Hon'ble Chairman also observed that the curtailment of RE power needs to be taken up only on a rotation basis covering all the SSs.

G) State Power Committee (SPC):

- State Power Committee is mandatory as per the Regulation and accordingly, the SPC would be constituted by providing representations from all the stakeholders, to ensure a perfect participation in a constructive manner.

H) Others:

- Next rounds of discussions can happen by the end of September 2021, based on the data collected during the Trial Forecasting done.
- Hon'ble Chairman assured that stakeholders could meet the Hon'ble Chairman to discuss any issue for arriving solutions amicably before approaching Courts and this would reduce the litigations in a larger way.

I) Key Points on the discussions of the Hon'ble Commission with SLDC:

- Hon'ble Chairman reiterated with the SLDC to work out for a simplified methodology, by which the aggregate forecasting and scheduling of the wind and solar power could be made, as a whole for the State, instead of the complicated method of apportioning the same for Pooling Station Wise or QCA Wise, with innumerable data and cumbersome procedures so involved.
- Wind developers shall have to give written consent to operate as a single QCA on their own and pay the aggregate deviation charges with respect to wind energy to SLDC by apportioning the deviation charges among themselves by their own agreement between themselves.
- Solar developers shall also have to give similar consent whether to act as QCA on their own or to accept the data evolved in the REMC of SLDC.
- The deviation should not be accounted for the period of curtailment if any imposed by the SLDC. The duration of curtailment shall be excluded from the computation to arrive at the percentage of deviation.
- Though the officers of SLDC stated that the data of actual power generated is shared on real time basis with *M/s. Leap Green Energy Private Limited*, the representatives of *M/s. Leap Green Energy Private Limited* during the meeting at Coimbatore kept that they are not receiving the same to make their forecasting still accurate.

- Therefore, the Chief Engineer / GO was advised to contact *M/s. Leap Green Energy Private Limited* and bridge the communication / data transmission gap and see that *M/s. Leap Green Energy Private Limited* is able to access the SLDC data on a real time basis, to instantly correct their forecasting and reschedule accordingly, which will be more easier and beneficial for both the wind developers and SLDC. There shall not be any gap in coordination of stakeholders in the process, particularly during the trial period, in order to make the trial effective to evolve the ultimate mechanism as accurately and effectively as aimed.
- A standard protocol with a scientific mechanism for curtailment shall be evolved both by calling for proposal from stakeholders and by SLDC themselves. After correlating both the proposals a final protocol shall be arrived and got approved by the Commission, for indiscriminate adoption. Till such time, SLDC shall ensure that the curtailment shall be done in a systemised cyclic order, covering all the Pooling Stations one by one without resorting to do the curtailment for a particular pocket of Pooling Stations repeatedly.

J) Conclusion:

- Most of the points raised by the stakeholders were addressed through both the meetings and accordingly, the Trial Forecasting needs to be commenced from 10.03.2021 onwards, covering a full wind season. Hence, members are now relieved off from their responsibility of nominating any QCA on their own. After the meeting with *M/s. Leap Green Energy Private Limited*, members will be further informed on the actions to be taken to go with the Trial Forecasting. Members are therefore advised to wait for further communications on the matter.
