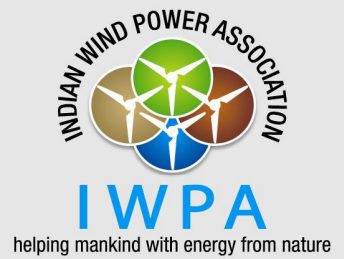


January 27, 2018



The Secretary  
Tamil Nadu Electricity Regulatory Commission  
No 19A, Rukmini Lakshmipathy Salai,  
Egmore, Chennai - 600 008.

Respected Sir

**IWPA additional comments on TNERC draft norms make Forecasting of Wind, Solar Power mandatory**

*Submitting additional comments to TNERC on Forecasting, Scheduling and DSM*

- 1) When wind generators propose and nominate a QCA for all their MW of their generating capacity, the AVC (Available Capacity in MW) of such QCA should be taken as the aggregate of all the MW proposed and nominated in the QCA's favour. While calculating the penalty for the nominating generator, the penalty should be based on the aggregated AVC of the QCA not on Pooling Station-based but SLDC Area-based. Essentially, the regulations should provide for aggregation of Forecasting and Scheduling of all the Pooling Stations in the State by QCA and not limited to each Pooling Station separately as larger the MW better is the accuracy.
- 2) If such QCA gets nominated for more than 51% of the installed capacity of the State, he should become the QCA for the State and he will work for the nominators only; i.e. for all substation in the State. Such a system is being followed in Karnataka. In case some generators are not giving their consent to the QCA who has been nominated by more than 51% of the generators with States installed combined capacity, then such generator can provide forecasting & scheduling for his generating capacity by himself. The regulation should provide taking action on the WEGs of those who are not providing forecasting & scheduling for the generation of their RE installation.
- 3) The deviation settlement amounts to be charged to the generator can be collected or paid for by the SLDC through TANGEDCO on a monthly basis on the strength of the list given to SLDC by the QCA.
- 4) The provision relating to Banking in Clause No. 5.20 of the draft regulation shall be removed as it is not relevant to forecasting and monitoring real-time generation.
- 5) If the SLDC curtails the generation of WEGs even after providing forecast and schedule by the respective QCA, the SLDC shall compensate the WEGs at applicable wind power tariff rate.

For Indian Wind Power Association,

Chairman

**Indian Wind Power Association**

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