

Workshop for Discussion on Draft MERC (Deviation Settlement Mechanism) Regulations 2018

Proposed DSM Framework in Maharashtra

Salient Features & Key Design Parameters
 Preparedness and Implementation Aspects

12 February, 2019

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Key changes for transitioning from FBSM to DSM

FBSM mechanism

- Centralised MoD at state level, undermines the Utilities/Pool participants role to do efficient power procurement planning/scheduling.
- 2. Requires SLDC to undertake actions that have commercial bearing on inter-utility exchange and its cost recovery is sub-optimal.
- **3.** Generators are not pool participants and framework does not encourage their adequate response to deviation management.
- 4. Not aligned to framework prevalent at National/Regional level, adds to complexities of settlement.
- Determination and operationalising Marginal cost of Utility (WASMP) with conditions of technical minimum, ramp rates, commercial min. poses challenges.

DSM framework

- 1. Centralised MoD to Decentralised Utilitywise MoD on day-ahead basis
 - Choice for DISCOMs to contract URS on day-ahead basis and intra-day.
- 2. Intra-day operation thru SLDC intervention only within boundary conditions and to address system conditions.
- Inclusion of Generators into State Pool and responsible for deviations.
 Introduction of stringent conditions Volume Limits, zero-crossing
- 4. DSM Price Vector aligned with CERC DSM pricing at Regional level
- 5. Creation of Non-Zero Sum DSM Pool Account at state level
- 6. Institutional framework align with RPC

Salient features of Key Design Parameters for DSM...(1/6)

Sr	Design Parameters	Draft MERC DSM Regulations, 2018 (published for public consultation)	Proposed revision (under-discussion)
1	Applicability/ Premise	 Sellers: All Generating Stations > 50 MW connected to InSTS including CPPs and OA generators Buyers- Dist. Licensees, Deemed Dist. Licensee and Full OA consumers connected to InSTS Treatment to the Partial OA shall be as per the provisions of MERC OA Regulations and its Amendment. 	 Sellers: All Generating Stations > 25MW connected to InSTS including CPPs and OA generators Buyers- Dist. Licensees, Deemed Dist. Licensee and Full OA consumers connected to InSTS Treatment to the Partial OA shall be as per the provisions of MERC OA Regulations and its Amendment. (Suitable amendments to State Grid Code, as necessary)
2	Scheduling requirement for Generating Stations	 All Generating Stations (Sellers) connected to InSTS and installed capacity limit (> 50 MW) to be covered. 	 All Generating Stations (Sellers) connected to InSTS and installed capacity limit (> 25 MW) to be covered. Regulations to cover all Gen. stations (incl. biomass and bagagsse cogen > 10 MW) in stages.
3	Generator Tariff design	 Capacity Charge linked to availability and incentive linked to Normative PLF (scheduled energy) Energy Charge linked to Schedule Energy 	 Capacity Charge linked to availability and incentive linked to Normative PLF (scheduled energy) Energy Charge linked to Schedule Energy. (Suitable amendments in MYT Regulations for next Control Period)

Salient features of Key Design Parameters for DSM...(2/6)

Sr	Design Parameters	Draft MERC DSM Regulations, 2018 (published for public consultation)	Proposed revision (under-discussion)
4	Day- Ahead Scheduling process	 De-Centralised scheduling on Day ahead basis to be submitted by Buyers considering their respective PPAs and Availability of those Generators. Load-Generation balance by SLDC considering Utility-wise MoD on day-ahead basis. Buyers/DISCOMs have option to enter into D<>D contract for un-requisitioned surplus on two occasions 13:30 hrs and 20:30 hrs. SLDC to provide 'Target Despatch Schedule' to Generators and 'Target Drawal Schedule' to DISCOMs upon considering Utility-wise De-Centralised MOD. 	• Same as draft
5	Scheduling period and intra-day revisions	 15-minute duration on Day Ahead basis Intra-day revisions by participant to be effected in 6th time block and due to system constraint in 4th time block 	 15-minute duration on Day Ahead basis In line with IEGC, Intra-day revisions by participants and due to system constraint, to be effected in 4th time block
6	Rate for inter-se exchange of Un- requisitioned surplus (TBD)	 At Marginal Cost of Utility having Unrequisitioned surplus for the relevant monthly period. SLDC to maintain & publish account of inter-se exchange of surplus power. Regulatory scrutiny for efficacy of power procurement at the time of ARR scrutiny. 	 As per published Draft <u>OR</u> Linked to Market Price (daily simple average of ACP for W2) plus mark-up, say 1% or 3 paise/u, whichever lower. Same as draft

Salient features of Key Design Parameters for DSM...(3/6)

Sr	r Design Parameters	Draft MERC DSM Regulations, 2018 (published for public consultation)	Proposed revision (under-discussion)
7	Load-Generation balancing for real time operation (MoD) by SLDC during intra-day operations	 Real time despatch to be governed as per IEGC / State Grid Code. In case, the grid parameters including frequency, voltage parameters and transmission line loading and substation loading conditions deviate beyond permissible operating range, SLDC shall take suitable measures in the interest of reliable and safe grid operations and issue necessary despatch or curtailment instructions in accordance with Centralised MoD principles for the state as whole, as per approved MoD Guidelines so as to maintain the load- generation balance and comply with conditions stipulated under IEGC and State Grid Code. 	 Same as per draft Boundary conditions to be specified through scheduling and dispatch code and operating procedures. Cost of such operations to be funded by parties responsible for deviations and through state pool account.
8	Transmission loss accounting and treatment	 G<>T and T<>D interface metering for determination of InSTS Loss For scheduling purposes, Approved InSTS loss to be allocated amongst the State entities in proportion to the schedule drawl by each State Entity 	 Same as per draft Actual Losses shall be computed for the purpose of energy balance only and schedule of Buyer shall not be revised with actual InSTS losses. SLDC to maintain account of actual InSTS loss for each time block and publish reconciliation statement of monthly average InSTS loss vis-à-vis approved loss on its website.

Salient features of Key Design Parameters for DSM...(4/6)

Sr	Design Parameters	Draft MERC DSM Regulations, 2018 (published for public consultation)	Proposed revision (under-discussion)
9	Deviation accounting	 Deviation (drawal) = Actual Drawal – Schedule Drawal Deviation (Generation) = Actual Generation – Schedule Generation 	Same as per draft
10	Volume Limit	 Over-drawal or under-drawal by any Buyer during a time block shall not exceed 12% of its scheduled drawal or [X] MW whichever is less Volume Limit of [X] MW for distribution licensee(s) & Buyers shall be Minimum of (12% of schedule, (Peak Demand of Distribution Licensee or Buyer / ∑NCPD) x State Volume Limit), considering State Limits of 250 MW. Under-injection or Over-drawal by Seller during a time block shall not exceed 12% of its schedule generation or 10 MW, whichever is lower. 	 Same as per draft Rounding off of volume limit derived as per ratio formula to nearest integer value. Minimum Volume Limit of 1 MW is for Buyers having peak Demand upto 10 MW and 2 MW for Buyers having Peak Demand >10 MW and Upto 20 MW.
11	Zero-crossing or requirement for change of sign by	 In the event of sustained deviation from schedule in one direction (positive or negative) by any state entity, such State Entity (Seller only) shall have to make sign of their deviation from schedule changed, at least once, after every 12 time blocks. Additional charges @10% to be applicable for violation of the condition Applicability of Zero Crossing for Buyers shall be applicable from date to be notified separately. 	 Revision in condition for sign change from 12 time block to 6 time blocks due to CERC DSM 4th Amendment However, applicability of Zero Crossing to be monitored at this stage. Penal conditions for buyers and sellers to be effected at later date to be notified separately.

Volume Limit for Intra-State Entities (illustration)

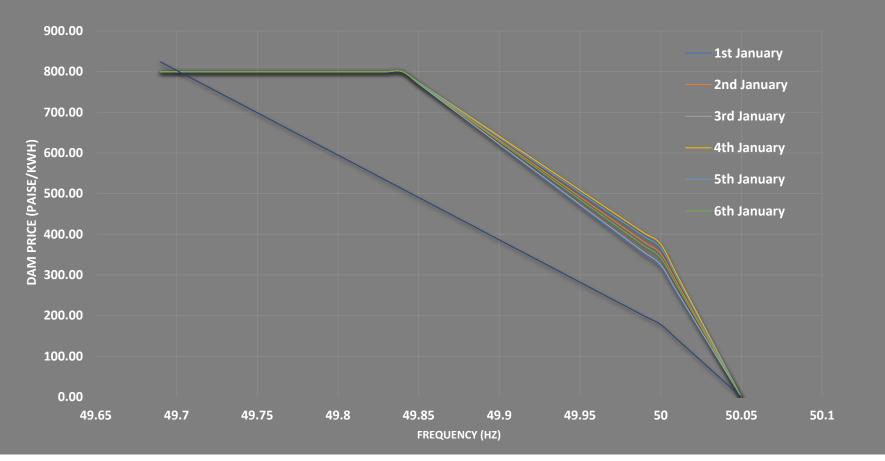
Maharashtra							
State deviation colume limit (L)	250	MW					
ISGS share at State periphery	9,000	MW					
State Peak Demand (NCPD)	20,468	MW					
DISCOMs/TOAs	Peak Demand	Cap. Limit	Ratio	Deviation Limit	Deviation Limit	Devn. Volume Limit	Proposed
	(MW)	(MW)	(%)	(MW)	(MW)	(MW)	Dev. Vol. Limits
	(a)	(b) = 12% x (a)	(c)	(d) =319 MW * (c)	(f) = 250 MW * (c)	(e) = Min(b,d,f)	MW
MSEDCL	16948	2034	83%	263.77	207.01	207.01	207
AEML	1475	177	7%	22.96	18.02	18.02	18
BEST	844	101	4%	13.14	10.31	10.31	11
TPC-D	822	99	4%	12.79	10.04	10.04	10
Railways	353	42	1.72%	5.49	4.31	4.31	5
MBPPL	15	2	0.07%	0.23	0.18	0.18	2
GEPL	4	0.5	0.02%	0.06	0.05	0.05	1
Nidar	7	1	0.03%	0.10	0.08	0.08	1
Total (NCPD for State)	20468		100%	319	250		255

Deviation Volume limit (X) for DISCOM = Min (12% of schedule , (Peak Demand / ∑NCPD) x State Volume Limit) with minimum volume limits of 1 MW

Salient features of Key Design Parameters for DSM...(5/6)

Sr	Design Parameters	Draft MERC DSM Regulations, 2018 (published for public consultation)	Proposed revision (under-discussion)
12	Charges for Deviation (DSM Price Vector)	 State DSM price vector to CERC DSM Price vector linked to frequency as amended from time to time. DSM covers freqn range from 49.7 HZ to 50.05 Hz. 	 To be revised with linkage to DAM in line with CERC DSM 4th Amendment To be revised freqn range from 49.85 HZ to 50.05 Hz.
13	Additional Deviation Charges	 Additional Deviation Charges shall be applicable as and when Volume limits as specified are crossed by Buyer s/Sellers. Volume Limit for Intra-state Entities proposed as under: For Generators /Sellers : 12% of Schedule Injection or 10 MW, whichever lower For DISCOMs/Buyers: 12% of Schedule Drawal or 'X' MW Limit, whichever lower (linked with NCPD of Buyer) Additional Charges at rate of 20%, 40%, 100% of Applicable Deviation Charges in steps of deviation 12%-15%, 15%-20%, > 20% or X+10 MW, X+ 20 MW, > X+ 25 MW 	 Volume Limit for Intra-state Entities proposed as under: For Generators /Sellers : 12% of Schedule Injection or 30 MW, whichever lower For DISCOMs/Buyers: 12% of Schedule Drawal or 'X' MW Limit, whichever lower (linked with NCPD of Buyer) Additional Charges at rate of 20%, 40%, 100% of Applicable Deviation Charges in steps of deviation 12%-15%, 15%-20%, > 20% or < Y, Y+10 MW, Y+ 20 MW, > Y+20 MW (i.e. Y is 30 MW)





Summary of revised Design parameters of the MERC DSM Framework - DSM Price Vector

Particulars	Volume	Limit	<49.85 Hz	49.85 Hz to 50.0 Hz	50.0 Hz to 50.05 Hz	> 50.05 Hz	
T al ticulars	% of schedule	MW	N45105 112	45105 112 10 5010 112	50.0 Hz to 50.05 Hz	2 30103 TIL	
	<12%	<x< td=""><td>No Over-drawal permitted (Reg.10(B) proviso)</td><td>DSM</td><td>DSM</td><td></td></x<>	No Over-drawal permitted (Reg.10(B) proviso)	DSM	DSM		
Over-drawal	12% to 15%	X to X+10		120% of DSM (Reg.10(D&E))	120% of DSM (Reg.10(D&E))	Zero	
(by Buyer)	15% to 20%	X+10 to X+20	ADSM to be specified (Reg.10(G) & (I))	140% of DSM (Reg.10(D& E))	140% of DSM (Reg.10(D& E))	(Reg.9(A)(6))	
	>20%	>X+20		200% of DSM (Reg.10(D&E))	200% of DSM (Reg.10(D&E))		
Under-drawal	<12%	<x< td=""><td>DSM</td><td>DSM</td><td>DSM</td><td>No Under-drawal permitted (Reg.10(B) proviso)</td></x<>	DSM	DSM	DSM	No Under-drawal permitted (Reg.10(B) proviso)	
(by Buyer)	12% to 15%	X to X+10	Zero	Zero	Zero	Zero (Reg.9(A)(4) & (6)	
(by buyer)	15% to 20%	X+10 to X+20				and ADSM	
	>20%	>X+20	(Reg. 9(A)(4))	(Reg. 9(A)(4))	(Reg. 9(A)(4))	(Reg.10(F))	
Over Injection	<12%	<x (or="" 30)<="" td=""><td>DSM subject to Cap-Rate (Reg9(2))</td><td>DSM subject to Cap- Rate (Reg9(2))</td><td>DSM subject to Cap- Rate (Reg9(2))</td><td>No Over-Injection permitted (Reg.10(C))</td></x>	DSM subject to Cap-Rate (Reg9(2))	DSM subject to Cap- Rate (Reg9(2))	DSM subject to Cap- Rate (Reg9(2))	No Over-Injection permitted (Reg.10(C))	
Over-Injection	12% to 15%	X to X+10	Zero	Zero	Zero	Zero (Reg.9(A)(4) & (6)	
(by Seller)	15% to 20%	X+10 to X+20				and ADSM	
	>20%	>X+20	(Reg. 9(A)(5))	(Reg. 9(A)(5))	(Reg. 9(A)(5))	(Reg.10(F))	
	<12%	<x (or="" 30)<="" td=""><td>No Under-Injection permitted (Reg.10C)</td><td>DSM</td><td>DSM</td><td></td></x>	No Under-Injection permitted (Reg.10C)	DSM	DSM		
	12% to 15%	X to X+10		120% of DSM (Reg.10(D&E)) CapRate	120% of DSM (Reg.10(D&E)) CapRate		
Under-Injection (by Seller)	15% to 20%	X+10 to X+20	ADSM to be specified (Reg.10(G) & (I))	140% of DSM (Reg.10(D& E))CapRate	140% of DSM (Reg.10(D& E)) CapRate	Zero Reg 9(A)(6)	
	>20%	>X+20		200% of DSM (Reg.10(D&E)) CapRate	200% of DSM (Reg.10(D&E)) CapRate		

Salient features of Key Design Parameters for DSM...(6/6)

Sr	Design Parameters	Draft MERC DSM Regulations, 2018 (published for public consultation)	Proposed revision (under-discussion)
14	State DSM Pool and regional DSM settlement (incl. RTDA/Congestion charges by WRLDC)	 Framework addresses creation of state DSM Pool (non-zero sum) which will settle Regional DSM pool settlement. Capping for Generation price vectors creates Non- zero sum in pricing terms Provisions cover treatment of RTDA/ Congestion charge recovery. 	 Non-Zero sum State DSM Pool shall be created which will take care of Regional DSM Charges incl. RTDA/Congestion charges. If any shortfall in State DSM Pool, under- recovery to be apportioned to all State Entities in proportion to deviations, on weekly basis.
15	Measurement unit of DSM Pool	 kWh (active energy) RkVAh (reactive energy) to be captured	Same as draft
16	Settlement Period	 15-minute time block or as revised State Deviation Account Statement on Weekly State Energy Account Statement on Monthly 	Same as draft
17	Institutional arrangement	 MSPC to continue with suitable modification in its composition to have adequate representation of Generators, TOAUs, RE Generators, Deemed Licensees etc. Role and powers of MSPC to be modified and aligned with DSM Regulations – co-ordinate & facilitate interse power exchange, monitor compliances, submit annual report, guide in modification of procedure 	 Same as draft Guidance for Composition of MSPC to cover Railways, one representative Deemed Licensee, IPP/Merchant Generating Co with capacity (>1000 MW), representative from QCA, representative biomass/cogen.

Alignment of State DSM Regulations with 4th Amendment of CERC DSM Regulation

#	Existing Provision of MERC Draft DSM Regulations	4 th Amendment to CERC DSM Regulations (20 Nov 2018)	Proposed revision (under-discussion)
1	Freq. limits are 49.7 Hz to 50.05 Hz.	Freq. Limit revised to 49.85 Hz to 50.05 Hz	To be considered
2	DSM price vector linked with approved variable cost of coal based TPS.	 New Definitions - Area Clearing Price (ACP), Day Ahead Market Price (DAM), Area Control Error (ACE). Change in Deviation Price Vector from pre- determined linkage with fuel price to Day ahead Market Price with revision in Slope 	To be considered to be in line Regional Deviation Charges
3	Cap rates are linked with variable of cost Gas based power plant.	Revision of CAP Rate linkage	Provision of Draft Regulation to be retained
4	For continuous deviation in either direction, Zero Crossing is must after every 12 time blocks for 13 th time block. (Applicable to Seller only)	Revision in Time-blocks for Zero Crossing from 12 to 6	(proposed to be introduced in stages)
5	Overall volume limit for Intra-day cumulative deviation	Daily deviation volume limit 3% for beneficiaries and 1% for Generators and treatment thereof (to be notified separately)	To be introduced in the later date

Discussion on Preparedness and Implementation aspects of DSM Regulations

- Preparedness requirement Broad Activity Check List
- Preparedness of Intra-State Entities
 - Role of Sellers
 - Role of Buyers
 - Role of STU
 - Role of SLDC
- Constitution of Working Group for monitoring the Process of DSM Implementation

Preparedness for DSM implementation: Broad Activity Check-list – 1/2

Sr. No.	Activity	Action By	Timeline (indicative)
1	Identification of Intra State Entities and their registrations	STU (in consultation with SLDC, Genco, DISCOms)	M1
2	Demarcation of Interface boundary for each Intra State Entity and its registration	STU	M1-M2
3	Assessment of Meters - Main, Check and Standby covering all interface points and initiation of tender process for procurement for meters and award	STU	M1-M3
4	Assessment of AMR logistics requirement, IT infrastructure, communication architecture and initiation of tender process for procurement and award	STU	M1-M3
5	Approval of the DPR (for additional Infrastructure Metering/AMR/CT/PT) by MERC	STU/SLDC/MERC (Work-in- progress)	M1-M2
6	Formulation /Modification of Scheduling and Despatch Code and Operating Procedures for Scheduling and Despatch	MSLDC / MERC	M1-M3
7	Formulation of Procedure for State Deviation Pool Account Operations	MSLDC / MERC	M2-M4
8	Modification to Business Rules/Composition of State Power Committee	MSLDC/MSPC	M5
9	Commencement of load forecasting /scheduling by DISCOMs and Scheduling by Generators (ongoing)	Gencos/DISCOMs/SLDC Operational, To be aligned	M6-M8
10	Commencement of Interchange Scheduling by SLDC for all the Intra State Entities	Gencos/DISCOMs/SLDC Operational, To be aligned	M6-M8
11	Completion of Boundary Metering and AMR System (as per DPR) and its integration to Energy Accounting Software	STU	M4-M9
12	Procurement and Deployment of IT Infrastructure (Hardware) MSLI		M3-M4
13	Development and Deployment of IT Infrastructure (Software)		M4-M8
14	Pilot run and testing of DSM Account operations	MSLDC/State Entities	M9-M12
15	Preparation of Energy Account by SPC/SLDC and publication of Website	MSLDC	M12-M13

Role of Sellers / Generators

Role of Intra-State Generators (SGS):

- Need to Declare Availability to MSLDC
- Adhere to Despatch Schedule given by MSLDC
- Expected to generate to comply with Despatch Schedule, respond to Frequency and Volume Limits specified in the MERC DSM Regulations.
- Ensure conformity to Technical Standards/requirements Reserve Requirements, Technical Minimum, Ramp Up, Ramp-down, compliance to Grid Code and SLDC instructions.
- Develop internal systems, process for monitoring and reporting on DCs, Energy Accounts, Deviation management and Accounting.
- Fix responsibilities for Deviation Management and Accounting and participate/represent in State Pool Account deliberations.
- Need to take the measures to observe the provision of Zero Crossing to avoid applicability of Additional Deviation Charges (as & when introduced)

Role of Buyers/DISCOMs

Load Forecasting and scheduling Process

- Accurate assessment of load profiles of Discoms with appropriate drill downs (Circle/Division/Substations etc.) to develop day ahead schedules
- Factoring Open Access transactions and Embedded Generation, if any
- Institutionalise process at various levels (Substation/Circle level) (DSO Operations)

Load Forecasting Tools and Techniques

- Use of sophisticated load forecasting tools.
- Large data warehouse to be provided for historical analysis (seasonal variations).
- Development of Internal Capacity and Skillset for Analysis of Load Profile and estimation of likely variation in the Load Profile for future Time Blocks

Power Procurement Planning and surplus power trading

- Generators under PPA shall be paid on Scheduled basis. Discom needs to maintain its drawal close to schedule in real time to minimise the deviation and excess payment to the Generators.
- DSM Regulations enables **inter-utility power transactions** for URS.
- Surplus power trading opportunities
- Real time load management
 - Revision of Schedules during Real time operation as and when required.
 - Management of curtailment instructions, prioritisation sequence, process, protocol.
 - Availability of communication infrastructure and visibility at feeder level demand response

Role of STU

- Identification of Intra-State Entities and plan to accommodate revisions
- Identification of Interface metering points at G<>T, RE<>T, T<>D, ISTS<>InSTS, InSTS<>OA Users Periphery
- Ensuring 5-Min capable Metering Infrastructure for all Interface Metering Points with CT/PT for Main/Check and Standby meters as per CEA metering Standards
- Establishment of AMR facilities with Communication infrastructure for all metering points upto SLDC control Room
- Ensure upkeep, accuracy & completeness of metering Data
- Suggest modification to Metering Code/Metering Plan
- Ensure registration of every interface point and interface meter and change/revision in mapping of interface points/feeders.
- **Record of replacement**, substitution, modification to metering infrastructure
- **Continuous Support** during operation phase

Role of MSLDC

- MSLDC shall continue to play role of 'System Operator' under DSM Framework.
- **Development/Modification** of scheduling/despatch, monitoring and operating procedures.
- Formulation of Operating Procedures for Deviation Accounting and State energy accounting procedures.
- Detailed co-ordination of processes to be institutionalised between SLDC and Buyer and Sellers.
- SLDC needs to prepare **load generation balance** for Day ahead scheduling and also during real time operation.
- **Co-ordination with WRLDC** for ISGS and all inter-state transactions, Regional Deviation accounting.
- Managing transmission congestion and curtailment priorities
- Collection of Metering data from all G<>T & T<>D and other interface points
- Verifying, Processing & storing the collected data
- **Obtaining required data** from other sources that is required to run DSM like:
 - Weekly UI charges and CGS scheduled generation / Bilateral inter-state purchase/sales.
 - Variable Cost for MoD stack Operation (Utility-wise/Centralised),
 - Area Clearing Price for Day ahead Market operations
- Ensure accuracy & completeness of data before the DSM in run
- Issue Deviation Settlement Bills on Weekly basis and Energy Account on monthly basis.
- **Co-ordination and support** for MSPC

Constituents/Members of Working Group by the Commission:

Sr. No	Member	Role
а.	Director(EE), MERC	Head/Convener
b.	Chief Engineer /STU (Planning)	Member
С.	Chief Engineer/STU(Communication/PAT)	Member
d.	Chief Engineer, MSLDC	Member
e.	Regulatory Expert, Idam Infra (Consultant)	Member
f.	Deputy Director, MERC	Convener
g.	Any other representative(s) from stakeholders as	Special Invitee

Terms of Reference (TOR) for Working Group on DSM implementation

- To **review action plan for implementation** of Interface Metering arrangement, AMR facilities & communication infrastructure, prepared by STU.
- To **monitor progress of** Interface Metering and **guide during implantation phase** as per milestones under Action Plan for Interface Metering.
- To highlight **need for amendment to metering code** and suggest measures for regulatory intervention, if necessary.
- To review and suggest modifications to draft operating procedure for scheduling and dispatch as per MERC DSM Regulations, prepared by MSLDC.
- To review and suggest modifications to **draft procedure for energy accounting/deviation accounting** as per MERC DSM Regulations, prepared by MSLDC.
- To review and suggest amendment to **MoD Guidelines**, if necessary.
- To prepare and suggest **modification to MSPC constitution** to ensure wider participation and representation of different stakeholder groups, as per DSM Regulations.
- To guide during **pilot run/test run of DSM tool** and address implementation difficulties and suggest measures for regulatory intervention, if any.
- Any other matter relevant for **implementation of DSM Regulations** at state level

- It is envisaged that the tenure of operation of Working Group shall be for period of 12 months, or earlier or as may be guided with approval of the Commission.
- Working Group shall meet once a month or as necessary and expedient in the interest of expeditious implementation of DSM Regulations at state level.
- Working Group shall prepare and submit Minutes of Meeting or Monthly Progress
 Report, from time to time.

Thank You