

TAMIL NADU GENERATION AND DISTRIBUTION CORPORATION LTD

From  
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To  
Shri. Sanoj Kuma Jha,  
Secretary ,  
Central Electricity Regulatory Commission  
3 rd& 4th Floor, Chanderlok Building,  
36 Janpath,  
New Delhi-110001

Lr. No. CE/M/RC/SE/CERC/EE/ AEE/F. Transmission Planning /D.258/17 dt:29 .08.2017

Sir,

Sub: Draft Transmission Planning and other related matters - Furnishing of  
comments and views of TANGEDCO - Regarding.

Ref : CERC Notification No. L-1/220/2017/CERC Dated the 26th April, 2017

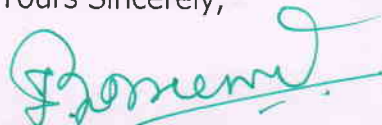
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Adverting to your notification vide letter cited under reference, I am furnishing  
the comments and suggestions of TANGEDCO in respect of the draft Central Electricity  
Regulatory Commission (Transmission Planning and other related matters) Regulations,  
2017 enclosed as Annexure. It is requested to consider the views of TANGEDCO .

Encl: Annexure

Kind Regards,

Yours Sincerely,



Chief Engineer/Mechanical  
Regulatory Cell )

Comments on the Draft Central Electricity Regulatory Commission  
(Transmission Planning and other related matters) Regulations, 2017 by  
System studies wing

**DATA REQUIREMENT FOR TRANSMISSION PLANNING STUDIES**

- All generators including Renewable Energy Generators may be mandated to provide technical data irrespective of the capacity as required for steady state as well as dynamic studies for modelling and study purpose. The details of reactive compensation and harmonic filters are to be emphasised.
- The data may be classified based on the applicability for Planning or Operational study.
- Scenarios considered for the study can be decided based on state specific conditions viz. wind season, summer/rainy etc. in line with the guidelines by CEA.

**DEMAND PROJECTION**

- While formulating guidelines for a common methodology in demand/load forecasting as opined by Power Grid, the intra state demand growth variation specific to each state have to be taken into consideration.
- For Renewable Energy rich states, special provisions are to be made by considering the huge quantum of renewable energy penetration in the generation mix of those states.

**TRANSPARENCY IN THE PLANNING PROCESS**

- Only the relevant data pertaining to stake holders other than STU can be shared if necessitated. The base case data base of the entire state network can not be disclosed.
- The RE Generators can participate in Transmission Planning process from the initial stage till completion of the planned schemes. The progress of RE projects and the proposed transmission schemes of STU have to go hand in hand with continues supply and commitment from the generators so that the

infrastructure intended for the RE schemes involving huge investments will not become redundant.

## **NEED FOR TRAINING**

Various dynamic and special studies are to be carried out by the planners before implementation. All these require specific training to the manpower deployed for the planning study. For understanding and proper implementation, imparting continuous and periodical training to STU personnel involved in System studies of respective states.

## **REPRESENTATION OF STU IN CENTRAL STUDY COMMITTEE**

Issue based state representation is necessary in central study committee (CSC).

## **GNA (General network access)**

- The Government policies are in favour of promotion of various renewable energy sources in states and especially RE rich states have to bear the burden of handling huge quantum of renewable energy.
- Determination of appropriate GNA drawal/injection will be very difficult.
- Tamil Nadu is having huge potential of wind, solar and offshore wind. The seasonal / intermittent nature of renewable energy generation may lead to deviation in the GNA quantum of drawal/ injection. Strict adherence to regulations with GNA concept may be difficult and this will result in penalisation and financial liability ultimately to RE rich states like Tamil Nadu.