



ASSAM POWER DISTRIBUTION COMPANY LIMITED

CIN: U40109AS2003SGC007242

Office of Chief General Manager – Commercial & Energy Efficiency

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No. APDCL/CGM(COM)/PoC Regulation/2019/ 2

Dated: 02/12/19

To,

✓ The Secretary,
Central Electricity Regulatory Commission,
3rd and 4th Floor,
Chandralok Building,
36, Janpath, New Delhi- 110001

Sub: Comments on the Draft Central Electricity Regulatory Commission (Sharing of Inter- State Transmission Charges and Losses) Regulations, 2019

Ref: L-1/250/2019/CERC Date: 31st October, 2019

Sir,

With reference to the above, I would like to submit comments (3 no. of copies) on the Draft Central Electricity Regulatory Commission (Sharing of Inter- State Transmission Charges and Losses) Regulations, 2019 as enclosed here with. Soft copy is already mailed and also uploaded through SAUDAMINI Portal.

This is for your kind necessary action in this regard.

Encl: As above

Yours Faithfully,


General Manager (TRC)

Memo No. APDCL/CGM(COM)/PoC Regulation/2019/

Dated:

Copy To:

1. The PS to the MD, APDCL, Bijulee Bhawan for kind information to the MD, APDCL.


General Manager (TRC)

Comments on the Draft Central Electricity Regulatory Commission (Sharing of Inter- State Transmission Charges and Losses) Regulations, 2019 placed before Hon'ble CERC by APDCL, Assam

1. Regarding Regulation 7. Components and sharing of Transformers Component (TC):

It is mentioned in the draft regulation that the Transformers Component shall comprise of transmission charges for inter- connecting transformers (ICTs) planned for drawal of power by the state and *it shall be borne by the State in which they are located.*

But, an inter- connecting transformer may not only benefit the State at which it is located, but also the neighboring states. In case of Assam, there are many Inter- connecting transformers of Power Grid Corporation of India Limited which benefits the neighboring states of Assam also. It may be noted that besides the system demand, installation of such transformer may sometime depend upon the geographical factor also which may make it more convenient to install ICTs in Assam's geographical area rather than in the hilly neighboring states. The actual benefit from the ICTs i.e. the actual sharing of the loading of the ICTs to the beneficiaries may be studied by the Load Flow Study or system study.

In this regard, our submission is to consider this fact and amend this regulation by sharing the Transformer component of transmission charges among the actual beneficiaries (States) in proportion to the actual sharing of the loading of the ICTs to the beneficiaries at peak block.

2. Regarding Regulation 9. Computation of share of transmission charges under AC-UBC

It is mentioned in the draft regulation that the Base Case file shall be prepared by considering the actual generation and demand, in MW, at each node of the Basic Network for the Peak Block.

But at that particular Peak Block, if any generator is under shut down or any transmission line is under outage which otherwise generates or transmits power at other time blocks, then the Peak Block will not properly represent the normal usage of network. In this case, there should be a mechanism to address the issue so that generator or transmission line under outage also can be brought under the Base Case file.

Also, the Peak Block should be considered based on Special Energy Meter's data as SCADA data is erroneous.

hcl
02/12/19
General Manager(TRC)
APDCL, Bijulee Bhawan, Guwahati-1