

From: Chintan.Mankad@adani.com

Date: 31 December 2019 at 11:55:13 AM IST

To: "Sanoj Kumar Jha Secretary" <secy@cercind.gov.in>,"Shilpa Agarwal" <shilpa@cercind.gov.in>

Subject: **Comments on Draft CERC Sharing of Interstate Transmission Charges and Losses Regulations, 2019**

Dear Sir / Ma'am,

With reference to the comments invited by the Hon'ble Commission on the above mentioned Draft Regulations, we hereby submit our comments on the same with a request to kindly take the same on record.

With Regards,

[Adani Power \(Mundra\) Limited.](#)

Adani Power (Mundra) Limited Comments on Draft CERC Sharing of Interstate Transmission Charges and losses Regulations, 2019

S. No.	Clause No.	Proposed Regulation	Existing Regulation	Comments
1.	6 (4)	<i>(4) Transmission charges covered under sub-clause (b) of clause (1) of this Regulation shall be shared by DICs of the same region in the ratio of their quantum of Long Term Access plus Medium Term Open Access.</i>	Clause not present in CERC (Sharing of Inter-State Transmission Charges and Losses) regulations, 2010	<ul style="list-style-type: none"> It may be clarified that the said clause shall be applicable only to Drawee DICs.
2.	11 (5)	<i>Where Long Term Access to ISTS is granted to a generating station on existing margins and COD of the generating station or unit(s) thereof is delayed, the generating station shall pay transmission charges @10% of transmission charge for the State where it is located for the quantum of such Long Term Access.</i>	Clause not present in CERC (Sharing of Inter-State Transmission Charges and Losses) regulations, 2010	<ul style="list-style-type: none"> If LTA is granted on existing margins, there should not be any charge on the DIC until the generating station achieves COD.
3.	13(2) (c)	<i>ii. In case aggregate metered ex-bus MW injection or the aggregate metered MW drawal of a DIC, in any time block exceeds the sum of Long Term Access and Medium Term Open Access, the concerned DIC shall</i>		While determining the TDR it is also necessary to consider the approved Short Term and Collective Transactions. The proposal to not levy Transmission Charges for STOA Transactions in ISTS indirectly results in subjecting such transactions to 20% additional charges. Most of the generators are forced to sell power under STOA at unviable tariffs due to non-availability of long term / medium term

S. No.	Clause No.	Proposed Regulation	Existing Regulation	Comments
		<p><i>be charged for such deviations @ Transmission Deviation Rate as determined below.</i></p> <p>iii. Transmission Deviation Rate shall be calculated as follows:</p> <p><i>a. Transmission Deviation Rate for a State shall be charged at 1.20 X (transmission charges of the State for the Billing month)/ (quantum of Long Term Access plus Medium Term Open Access of the State for the Billing month)</i></p>		<p>power sale opportunities. Forcing such generators to pay additional 20% charges will make them further unviable. Since, the STOA is granted on the residual transmission capacity after factoring LTOA & MTOA transactions. The transmission charges so received from STOA reduces the burden of customers who have availed LTA. By levying any additional charges on STOA transaction over & above normal charges, this shall lead to increased prices in STOA transactions, thereby, resulting in higher power purchase cost of Discoms.</p>
4.	13 (3)	<i>No transmission Charges shall be levied for Inter-State transmission system in respect of Short Term Open Access transactions.</i>	As per the existing practise the STOA collection is disbursed among the DICs in proportion to the LTA/MTOA taken.	From the draft Regulations, it is not clear as to how the additional revenue being realised through TDR mechanism will be adjusted against the LTA MTOA charges being collected from the DICs. The same should be clarified by CERC.
5.	General	-	-	CERC should clarify the apportionment of the charges collected through TDER mechanism to the LTA + MTOA DICs.
6.	General	-	-	For better understanding of the proposed Draft Regulation it is requested that CERC should conduct a study of at least 3 high injecting States and also drawal States to present scenarios that shall arise under this proposed Regulations. The findings of the study along with a comparison of the current Regulation and proposed Regulation should be published for stakeholder consultation and a workshop should also be conducted, prior to conducting Public Hearing.

S. No.	Clause No.	Proposed Regulation	Existing Regulation	Comments
7.	(E) Computation: determination of sharing of transmission Charges - 5.17.4 (2)	-	-	The example provided under 5.17.4 (2) is not clear. CERC should clarify the example.