



GUJARAT ENERGY TRANSMISSION CORPORATION LIMITED

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CIN No. U40100GJ1999SGC036018

Ref. No. SLDC/CE/MIS/CERC/4738

Date: 29.11.19

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

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

Ref: CERC Public Notice No. L-1/250/2019/CERC Date: 31st October, 2019.

Dear Sir / Madam,

Vide above referred Notice, Hon'ble CERC invited comments / suggestions / objections on the Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019.

In this regard, SLDC – Gujarat would like to submit following views:

1. The SIL of transmission line for various configurations as per Annexure – II to be reviewed. It seems that there are typographical errors in table. The standard published by CEA in this regard to be considered.
2. In definition of YTC, it is proposed that all elements of ISTS, which have achieved CoD as on last day of billing month is considered.

Comments:

If the CoD of ISTS element is declared on e.g. 31st of Oct, then the charges of such element shall have to be considered from Next month i.e. from 1st November.

- a. Moreover, if any planed shutdown avails within six months after date of CoD for completing pending points, replacement of insulators / equipment's etc., in that case, their CoD Status shall be withdrawn.
- b. The stopgap arrangements like utilization of partly portion of under constructed ISTS lines (LILo arrangements, T connection etc.) shall not be considered as CoD. It should not be a part of tariff petition for PoC charges.
- c. Sometimes, the construction of EHV line is completed, but bays at one of the ends is not ready. In such cases, the CoD of that transmission line shall not be considered.
- d. The transmission charges shall be recovered for fully constructed elements / EHV lines that are as per approved scheme only.

- e. Many times, it happens that the under constructed dedicated line of USER get connected to ISTS network as stopgap arrangement. In such cases, the transmission charges of ISTS network shall also be borne by that user.
3. In chapter 2 (5.4), the transmission charges for the National Component shall be shared by the drawee DICs in the ratio of their quantum of Long term Access plus Medium Term Open Access.
In chapter 2 (6.2), Transmission charges covered under sub-clause (a) of clause (1) of this Regulation shall be shared by the Drawee DICs in the ratio of their quantum of Long Term Access plus Medium Term Open Access. – **Regional component**
In chapter 2 (6.4), Transmission charges covered under sub-clause (b) of clause (1) of this Regulation shall be shared by the Drawee DICs in the ratio of their quantum of Long Term Access plus Medium Term Open Access. – **Regional component**
In chapter 2 (8.5), the transmission charges covered under AC-BC shall be apportioned to all drawee DICs in the ratio of their quantum of Long term Access plus Medium Term Open Access. – **AC component**

Comments on point 3 above:

The above charges shall be applicable to Short-term users also. Many USERS are utilizing ISTS network on short-term bases for fulfilling their regular demand or for evacuation of their generation. They are not interested to come up with LTA. Hence, the above charges shall also be applicable to STOA customers and should be equal to LTA.

4. In chapter 2 (7.2), it is stated that the Transformers Component of transmission charges shall be borne by the State in which they are located.

Comments:

At many places, the transformer is located in one State, but the downstream network is connected to different States / Union territory. In that case, the transformer charges should be borne by all Utilities.

Example: There are three 400/220 kV, 315 MVA ICTs in Vapi substation of PGCIL located in Gujarat. The downstream network is connected to Gujarat, Daman (UT), DNH (UT). So, Transformers Component of transmission charges of Vapi Substation shall be borne by Gujarat, Daman (UT), DNH (UT) in proportion to utilization.

5. In chapter (5) 21.6 , it is stated that If a DIC does not provide the required data, including injection or drawal data for intra-State points within stipulated time period, it shall be levied an additional transmission charge @ 1% of the transmission charges under the First Bill for the month.

In this regard, it is to inform that the State LDC / STUs of respective State provides data in validation committee. SLDC / STU is not a DIC. Therefore, the above clause shall be removed.

6. Where construction of dedicated transmission line has been taken up by the Central Transmission Utility as part of coordinated transmission planning and is constructed by an inter-State transmission licensee, the Yearly Transmission Charges for such dedicated transmission line shall be payable by the generating station in proportion to the Connectivity granted and for which Long Term Access is not operational. Such transmission charges shall be payable to the inter-state transmission licensee who has constructed such dedicated line.

Comments:

In this regard, the losses of such lines shall also be on account of the generators / USERS who seeks connectivity on dedicated lines. The losses shall not be pooled to other ISTS users.

7. In chapter 4,13(3), it is stated that No transmission Charges shall be levied for Inter-State transmission system in respect of Short Term Open Access transactions.

Comments:

Here, the waiver of STOA charges instigates private Discoms / OA consumers to avail more STOA. The Private Discoms may not come up with LTA to meet their demand and they tends to depend more on STOA. It may increase burden on long-term customer of ISTS. Hence, the transmission charges for STOA customers should be equal to LTA. *In addition, the STOA charges collected by CTU shall be refunded to host State only up to the quantum of LTA and MTOA approved.*

This is for kind information and perusal please.

Sincerely yours,

Sd/-
B. B. Mehta
Chief Engineer (SLDC)
Vadodara - Gujarat