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To

The Secretary, Ministry of Power,  
Govt. of India,  
Shram Shakti Bhawan,  
New Delhi.

**Memo No. Ch- 48 / ISMC-4/Vol-I**

**Dated: 05.02.2020**

**Subject: Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019.**

Please refer to your office DO No. 3/7/2017-Trans. dated 13.12.2019 vide which it was requested to give comments on the proposed new methodology of Sharing of Inter State Transmissions System (ISTS) Charges.

In this context it is intimated that the concerns/comments of Haryana regarding the provisions of draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019 are as under:

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

**5. Components and sharing of National Component (NC)**  
(3)(c) Proportionate transmission charges of Mundra-Mohindergarh HVDC Transmission System corresponding to 1005 MW capacity;

As per clause (5.8) of Annexure-I of Draft regulation states as under: -

“5.8 The dedicated transmission lines constructed, owned and operated by the ISTS Licensees shall be considered to be a part of the Basic Network. However, dedicated lines

constructed, owned and operated by the Generating Station shall not be considered as a part of the Basic Network and the Generating Station will be deemed to be connected directly to the ISTS for the purpose of modelling basic network;”

Haryana is paying double charges and losses for withdrawal of 1424/1495 MW power (from M/s APL) to both PGCIL as PoC Charges and to M/s APL as part of generation

	<p>cost as per PPA, as marginal participation of a HVDC line is zero, due to the fact that flow on the HVDC line is regulated by power order and hence it remains constant for marginal change in load or generation.</p> <p>The matter was earlier also referred to CERC and studies were carried out by NLDC in association with Haryana and found that transmission network usage cost allocated to Haryana has decreased by 30-40 crore which is around 20-26% of the cost allocated during Q2 of 2018-19. Further, Haryana requested CERC to carry out necessary modification in the Base case file being approved by Validation period.</p> <p>Keeping in view of above said study, Hon'ble Commission is requested that 1495MW capacity of Mundra-Mohindergarh line should not be part of Basic network.</p>
<p><b>5. Components and sharing of National Component (NC)</b>  (3) National Component-HVDC shall comprise of the following:  (a) 100% transmission charges for "Back to Back HVDC" Transmission System;  (b) 100% transmission charges for Biswanath Chariali/Alipurdwar - Agra HVDC Transmission System;  (c) Proportionate transmission charges of Mundra-Mohindergarh HVDC Transmission System corresponding to 1005 MW capacity; and  (d) 30% of transmission charge for all other HVDC Transmission Systems except those covered under</p>	<p>The Commission has allocated 30% of HVDC Charges under sub-clause (d) of clause (3) as a part of National Component.</p> <p>However, it is believed that HVDC lines play larger role in the reliability, resilience &amp; stability of transmissions system. Also, with increase in Renewable Energy Generation the dependability on HVDC to provide transmission system stability will increase.</p> <p>Thereby the Commission is requested to allocate 50% of HVDC Charges under sub-clause (d) of clause (3) as a part of National Component.</p>

<p>subclauses (a), (b) and (c) of this Clause of these regulations.</p>	
<p><b>7. Components and sharing of Transformers Component (TC)</b>  (1) Transformers Component shall comprise of transmission charges for inter-connecting transformers planned for drawal of power by the State. The list of such transformers for each State shall be provided by the Central Transmission Utility to the Implementing Agency.</p>	<p>CTU alone should not be permitted to identify ICT/ transformer being used to feeder demand of respective state. The list of ICT planned for drawal of power by State shall be decided by CTU only in consultation with STU, SLDC &amp; concern state DISCOM. The CTU – should demonstrate the same through power flow study that said ICT is only planned for drawal of state. Further, the matter of charging of Transformer components to a particular DIC i.e. the actual cost of the drawl transformers of ISTS network shall be recovered from the DIC for whose usage the transformers have been installed. When the ISTS network especially the ICTs were planned the aforesaid charges were not there, as such it would not be apt to change the terms of payment at this stage. As per the list of ICTs as contained in the Report of Task Force Haryana alongwith U.P. has maximum number of drawl transformers of ISTS in the Northern Region. The number of ISTS transformers in Haryana is 34.</p>
<p><b>9. Computation of share of transmission charges under AC-UBC</b>  (1) The Base Case file shall be prepared by the Implementing Agency for the Peak Block of the month comprising of the following:  (a) Basic Network, which shall be the network file for the power system for the</p>	<p>It is proposed that CERC or the Nodal agency NLDC to formulate the detailed procedure for getting the data for computation of the share of transmission charges under AC-UBC and subsequently the agency may be defined (STU/SLDC/DISCOMs) who shall be having the Data with respect computation of the share of</p>

<p>peak block of the month; and</p> <p>(b) Actual generation and demand, in MW, at each node of the Basic Network for the Peak Block.</p> <p>(2) The Implementing Agency shall collect the data for (a) and (b) above and the Yearly Transmission Charges from DICs, transmission licensees, NLDC, RLDCs, SLDCs, RPCs and STUs as per timelines specified in Regulation 21 of these regulations.</p>	<p>transmission charges i.e. SEM data or manual load and generation data.</p>
<p><b>9. Computation of Share of transmission charges under AC-UBC</b></p> <p>(4) Implementing Agency shall run AC load flow studies on the Base Case file stated at clause (1) of this Regulation for the month and determine power flow on each transmission line.</p> <p>Provided that while carrying out the load flow studies, the Implementing Agency may make minor adjustment in the generation and demand data, if required, to ensure load generation balance.</p>	<p>Any adjustment to be made by Implementing agency in generation &amp; demand data, shall be displayed on web portal made available for displaying various information as per Regulation-20 of this draft Regulation and the same shall be consulted with the respective DICs/SLDCs.</p>
<p><b>11. Transmission charges in specific cases</b></p>	<p>The following shall be added in clause no. 11</p> <p>(i) In line with provision in existing CERC connectivity regulation (16BSix amendment), LTA or MTOA customer shall be allowed to request concern RLDC to reallocate capacity which is going to be un-utilized for whole billing month (due to planned outage or major forced outage of generating unit) The concern DIC willing to do so shall inform reason &amp;RLDC after confirmation of same</p>

	<p>from generator shall schedule such corridor for scheduling under MTOA or STOA transaction depending upon the period of such under utilization with a condition that such transaction shall be curtailed in the event original LTA or MTOA customer seeks to utilize its capacity.</p> <p>(ii) Once DIC surrender such LTA for specific period, it shall not be liable to pay transmission charges for said LTA.</p>
<p><b>11. Transmission charges in specific cases</b></p> <p>(4) Where COD of a generating station or unit(s) thereof is delayed and the Associated Transmission System has achieved COD, which is not earlier than its SCOD, the generating station shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to capacity of generating station or unit(s) thereof which have not achieved COD.</p> <p>Provided that such transmission charges shall not be considered under Regulations 5 to 8 of these Regulations.</p>	<p>In case Associated transmission system has achieved COD before its scheduled COD &amp; before generating station get commissioned, the charges of transmission line shall not be allowed to be recover under POC under Regulations 5 to 8 of these Regulations. The CTU shall give details of its scheduled COD &amp; actual COD while submitting data for YTC.</p>
<p><b>16. Letter of Credit</b></p> <p>(2) The Letter of Credit shall have a term of 12 (twelve) months and shall be for an amount equal to 1.05 (one point zero five) times the average amount of the First Bill for a year, where tripartite agreement for securitization on account of arrears against the transmission charges with the</p>	<p>The LC for State owned DISCOMs shall not be levied.</p>

<p>Government of India exist.</p> <p>Provided that where such tripartite agreement does not exist, the DIC shall open the Letter of Credit for an amount equal to 2.10 (two point one times) the average amount of First Bill for a year.</p>	
<p><b>20. Procedures to be framed under these Regulations</b></p> <p>(2) The software for the implementation of these regulations shall be audited or cause to be audited by the Commission before it is put to use, and thereafter from time to time as may be decided by the Commission.</p>	<p>It is suggested that the information, software and procedures used for computation of PoC shall be shared with all DIC.</p>
<p><b>21. Timeline for furnishing the information</b></p> <p>(6) 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.</p>	<p>The Commission in the draft regulations has proposed an additional penalty @1% of transmission charge under the First Bill for the month. It is pertinent to mention that the information required for computation of sharing of transmission charges is extensive and involves many parties including SLDC, State Transmission Utility, Distribution utility. The Commission is requested to remove any such penalty in case of genuine reasons of delay at the end of DICs. The Commission is also requested to provide clarification on the information required from each entity and thereby assign responsibility to the entity along with timeline for the same and proper detailed procedure formulated with respect to drawal data manual/SEM data etc.</p>
<p><b>Annexure-I</b></p> <p><b>(E) COMPUTATION: DETERMINATION OF SHARING OF TRANSMISSION CHARGES</b></p>	<p>The existing Sharing of Inter-state transmission charges &amp; losses, Regulation 2010 mentioned the</p>

<p>5.17 The following steps shall be followed:</p> <p>5.17.1 Using AC load flow, marginal participation factors shall be computed for determination of transmission system utilization due to marginal injection / drawal at each Generating Station / demand node.</p> <p>.....</p> <p>(h) Multiply MF file (as modified above) with MTC file</p> <p>(i) Node wise charges are allocated.</p>	<p>treatment of HVDC lines as under:</p> <p><i>“Treatment of HVDC: Flow of HVDC systems is regulated by power order and remains constant for marginal change in load or generation. Hence marginal participation (MP) of HVDC systems is zero.....”</i></p> <p>This results in increase of PoC charges of Haryana as Haryana is receiving power from M/s Adani through a dedicated HVDC Mundra-Mohindergarh transmission line. Under Marginal Participation method, an increase in 1 MW of load in Haryana has to be compensated by a corresponding increase in generation at the slack buses at Mundra end, but as stated above, HVDC line doesn't respond in the marginal participation. Hence, power flows through alternate AC transmission lines which results in increase in the PoC charges for the state of Haryana.</p> <p><b>Further, it is stated that the draft sharing regulation, 2019 remains silent about treatment of HVDC transmission line.</b></p>
<p><b>Annexure-I</b>  <b>(E) COMPUTATION:</b>  <b>DETERMINATION OF SHARING OF TRANSMISSION CHARGES</b>  5.17.4 (2)</p>	<p>The example provided under 5.17.4 (2) is not clear. Hon'ble commission needs to clarify the example.</p>
<p><b>Annexure-II titled as</b>  “Surge Impedance Loading to be considered for determination of utilization of transmission line under these Regulations”</p>	<p>Typographical error may please be corrected. Same S.I.L(MW) has been shown for 765kV.</p>

**General Comments: -**

As per Regulation 13 (2) (c) (ii) of the Draft Regulation states that in case the drawal of a DIC, in any time block exceeds the sum of Long term Access and Medium term Open Access, the concerned DIC shall be charged for such deviations @ Transmission Deviation Rate. Moreover, as per Regulation

13 (2)(c)(vii), the charges for transmission deviations shall be calculated for a State as a whole. Further, Regulation 1393) provides that no transmission Charges shall be levied for Inter-State transmission system in respect of Short Term Open Access transactions. Meaning thereby, the charges towards Short Term Open Access are proposed to be accounted under transmission deviation account.

In this regard, it is to state that as regarding the Short-Term open Access availed by the DIC, the same may be allowed under existing LTOA+MTOA and accounted at Transmission Deviation account if actual drawal is more than the LTOA+MTOA. However, drawal of power under Short term Open Access by an embedded entity may lead to issues regarding the recovery of transmission charges from such embedded entities on back to back basis as drawal of power by the embedded entity may lead to implication on the State towards (i) liability for payment of Transmission Deviation charges and (ii) increase in the AC-UBC on account of the increase in actual utilization due to the Short-Term transaction by the embedded entity. The absence of a mechanism for recovery of transmission charges on back to back basis from embedded customer tantamount to providing Short term Open to the embedded customer at the cost and risk of the state DIC. Further, devising an appropriate mechanism by the State to recover the charges on back to back basis from embedded entities would also may be difficult considering the computation of AC-UBC and Transmission Deviation account as per the proposed mechanism.

This is for information and further necessary action at your end please.

This issues with the approval of Managing Director, HVPNL, Panchkula.

  
Chief Engineer/SO & Comml.,  
HVPNL, Panchkula.

CC:

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2. Chief (Engg), Central Electricity Regulatory Commission, 3<sup>rd</sup>& 4<sup>th</sup> Floor, Chanderlok Building, 36, Janpath, New Delhi.
3. Central Electricity Authority, Ministry of Power, New Delhi.
4. Chief Engineer, HPPC, Panchkula.
5. SPS to MD, HVPNL, Panchkula for kind information of MD, HVPNL, Panchkula please.
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