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Sent: Tue, 31 Dec 2019 18:02:28 +0530 (IST)

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

Respected Sir/ Madam,

This has reference to the CERC's Public Notice dated 31.10.19.

Attached are our comments/ suggestions on the Draft Sharing Regulations for your kind consideration.

Thanking you,

For JSW Energy Limited

Pritpal Singh
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**JSW Energy's Comments and/ or Suggestions on CERC's
Draft Sharing of Inter State Transmission Charges and Losses Regulations**

Draft Regulation No.	Draft Regulation	JSWEL Comments / Suggestions
Chapter 2, Regulation 5 (3) (d)	30% of transmission charge for all other HVDC Transmission Systems except those covered under sub clauses (a), (b) and (c) of this Clause of these regulations.	Since HVDC lines are primarily developed for transfer of bulk power over very long distances, it is very obvious that in such a case the generator and beneficiaries are very well identified. Also, the HVDC converter stations do cost more than the AC terminal stations and that HVDC converter stations form an integral part of the HVDC Transmission System. The proposed regulation considers only 30% of the related transmission charge to be considered as National Component for ISTS customers. It is suggested that major portion of the applicable transmission charges shall be allocated to the HVDC system users and only a small portion of around 10% of the same considering the flexibility and stability of the grid shall be passed on to other DICs. In any case, this component should not be shared by the Regional DICs.
Chapter 2, Regulation 5 (4)	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.	It is suggested that in order to keep both the Renewable and Conventional Generations separate and to ensure that the transmission charges for untied capacities of Renewable does not get loaded on the Conventional Generations, the Transmission Charges for the National Component Renewable shall be shared by only Renewable Generators including the untied capacities.
Chapter 2, Regulation 8 (5)	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	It is suggested that the Balance Component of AC portion shall be shared in ratio of LTA/MTOA of each DIC and the total LTA/MTOA on All India basis in the ISTS, since the usage based portion carved out had consisted of DICs on all India basis. Hence, the balance portion shall also be shared in the same ratio for DICs on all India basis. It should also be clarified that for generators this portion shall be taken as untied LTA capacities.

Draft Regulation No.	Draft Regulation	JSWEL Comments / Suggestions
Chapter 3, Regulation 11	<p>Where a generating station is connected to both ISTS and intra-State Transmission System, the ISTS charges and losses shall be applicable only on quantum of Long Term Access and Medium Term Open Access connected through ISTS and STU charges and losses shall not be applicable on such capacity connected through ISTS.</p> <p>Provided that this provision shall be subject to availability of adequate capacity in the intra-State Transmission System to draw allocated quantum of Long Term Access or Medium Term Access as certified by the Central Transmission Utility.</p>	<p>It is suggested the proposed regulation to be modified to bring in more clarity on the quantum of long term access and medium term access connected through STU. The regulation should clarify that in case, SLDC carries out scheduling, STU charges and losses shall not be applicable to schedules on ISTS. Since, CTU has the information about installed capacity of the generating station and capacity (MW) for which connectivity is sought from ISTS, while granting connectivity CTU should ensure that adequate State system is available or shall be made available. It shall further be clarified that in case a generating station is connected to State through inadequate capacity, and the power envisaged to be flowing through the State network actually flows into ISTS, then LTA Customer shall be not be liable for ISTS transmission charges and losses.</p>
Chapter 4, Regulation 12 (1) & 12 (5) (b)	<p>Implementing Agency shall notify total transmission charges payable by the DICs for the Billing month in terms of Rs. per MW for each State by dividing total transmission charges payable by the State by its quantum of Long Term Access and Medium Term Open Access.</p> <p>Payable transmission charges shall be notified by the Implementing Agency by 25th day of the month following the Billing month</p>	<p>The regulation may be suitably modified so as to incorporate the notification of total transmission charges payable by the DICs for the billing month on the website of the Implementing Agency for access in public domain.</p> <p>Payable transmission charges for last month shall always be updated on the website of Implementing Agency for access in public domain so as to enable the DICs to plan their future projects economically.</p>

Draft Regulation No.	Draft Regulation	JSWEL Comments / Suggestions
Annexure I (5.11.2)	<p>Total Circuit kms for transmission lines for each voltage level and conductor configuration shall be allocated uniform charges as per ratio methodology in illustrative example.</p> <p>An Illustrative Example is given for transmission lines</p>	<p>It is suggested to provide more clarity on the illustration/ example provided as an example, since following points are not clarified:</p> <ul style="list-style-type: none"> • Why only 400 kV D/C Quad Moose is considered as reference to calculate the ratio in first table • The total circuit kilometer is not matching between second and third tables • Why again 400 kV D/C Quad Moose line is considered as based for working out uniform rate per circuit kilometer for each voltage level and conductor configuration and rates for other lines are calculated accordingly. <p>It is suggested to share an editable version of the illustrative example for better understanding.</p>
Chapter 5, Regulation 20 (1)	<p>Implementing Agency shall notify detailed procedures and formats for collection of generation and demand data from each DIC, data pertaining to the Basic Network and for calculation of transmission charges within 90 (ninety) days of the notification of these Regulations and post it on its website.</p>	<p>It is suggested that the comments of all stakeholders may be sought for on the procedures to be notified by the Implementing Agency in order to incorporate views and suggestions from various aspects of all DICs.</p>