



M.P. POWER MANAGEMENT COMPANY LIMITED

CIN : U40109MP2006SGC018637

(A Government of M.P. Undertaking)

Regd. Office : Shakti Bhawan, Rampur, Jabalpur, Madhya Pradesh, INDIA, 482008

Tel : 0761-2661111, 2660500, Fax : 0761-2661696, Website : www.mppmcl.com, email : md@mppmcl.com

No.GM (Regulatory)/ 537

SPEED POST

Jabalpur, Dt. 06/02/2020

To,

The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th floor, Chanderlok Building
36, Janpath,
New Delhi – 110 001.

Sub: Draft Central Electricity Regulatory Commission (Sharing of Inter-state Transmission Charges and Losses) Regulations, 2019 – Comments/suggestions reg.

Ref: Public Notice No.L-1/250/2019/CERC dated 31.10.2019.

Dear Sir,

Public Notice for Draft Central Electricity Regulatory Commission (Sharing of Inter-state Transmission Charges and Losses) Regulations, 2019 was published on 31.10.2019. The same was also displayed on the website of CERC. It was desired from stakeholders to submit the comments/suggestions on the subject.


Later on, vide letter dated 18.12.2019 it was informed by Chief (Engineering) CERC that on the request of few of stakeholders, an inter-active session with the staff of the Commission will be held on 2nd Jan. 2020 at Conference Room, CERC, New Delhi.

Subsequent to discussions held during the inter-active session and after going through the documents uploaded on the website, comments/suggestions of MPPMCL are being mentioned in Annexure-I enclosed herewith.

(Comments approved by MD, MPPMCL)

Encl: As above.

Yours faithfully,


(RAJEEV KUMAR GUPTA)
Senior General Manager (Regulatory)
MPPMCL, Jabalpur

Annexure-I

Comments/Suggestions of MPPMCL on Draft CERC (Sharing of Inter-State Transmission Charges & Losses) Regulations, 2019.

Clause No.	Proposed provision	Comments/Suggestions
Chapter-2 Clause- 5 (2) (c)	National Component - HVDC shall comprise of proportionate transmission charges of Mundra – Mohindergarh HVDC transmission system corresponding to 1005 MW Capacity	This part of Mundra-Mohindergarh HVDC Transmission System was developed for evacuation of power from Mundra to Northern Region beneficiaries. As it has been laid exclusively for benefit of a region it should be fully loaded to the concerned region. Socialization of its cost will result in unnecessary financial burden on the end consumers of DICs who are not using the system.
Chapter-2 Clause- 5(2) (d)	National Component - HVDC shall comprise of 30% of Transmission Charges for all HVDC Transmission Systems except those covered under sub clauses (a), (b) & (c) of this clause of these regulations.	HVDC systems are generally developed for the beneficiaries of particular Region as such it would be appropriate that the charges pertaining to HVDC should be shared by Regional Entities as per practice in vogue. Presently, only 10% of cost of HVDC has been considered as reliability charges which has been proposed to be increased to 30% which is a steep increase.
Chapter-2 Clause- 9(5)	Percentage usage of each transmission line shall be computed by dividing power flow in the Base Case as obtained at Clause (4) of this Regulation by Surge Impedance Loading of the line.	Since load flow in transmission lines are allowed on the basis of thermal loading of conductor, thermal loading should be used instead of SIL. It will ensure that DICs are not subject to transmission deviation charges as Thermal loading works out to more than SIL.
Chapter-3 Clause- 11(5)	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.	If a generating station fails to achieve SCOD and LTOA or MTOA has been granted through available margin, it should be subject to payment of full transmission charges instead of only 10% and DICs who have fully paid transmission charges for the untied capacity of Generating Station should be compensated for the full transmission charges paid by it for the capacity reserved for LTOA of Generating Station.
Chapter-3 Clause- 11(6)	Where operationalization of Long Term Access granted to a generating station is contingent upon COD of Associated Transmission System consisting of several transmission elements and only some of the transmission elements have achieved COD, the generating station may seek	Above provisions have skipped mechanism of compensation to Discoms by ISTS Owner as Discom needs to pay the Generating Station fixed charges for the period entire transmission system is not commissioned. A provision therefore needs to be made that till the full operationalization of associated

	part operationalization of Long term Access. The Central Transmission Utility shall part operationalize Long Term Access corresponding to the capacity sought to be operationalized by the generating station, subject to availability of transmission system. The yearly Transmission Charges for such transmission elements shall be included in Regulations-5 to 8 of these Regulations.	transmission system for injection of power by Generating Station, the fixed cost burden of Discom shall be borne by the concerned ISTS Owner who is at default.
Chapter-3 Clause- 11(7)	In case the generating station or unit (s) thereof has achieved COD and transmission system is delayed, the concerned transmission licensee(s) shall make alternate arrangement for dispatch of power in consultation with Central Transmission Utility at the cost of transmission licensee(s).	A proviso may also be inserted to take care of fixed cost burden of Discom as under: <i>“Provided further that till such alternative arrangement is made, the transmission licensee(s) shall also pay to the Distribution Company, the fixed charges required to be paid to Generating Station by Distribution Company”.</i>
Chapter-4 Clause- 13(3)	No transmission charges shall be levied for Inter-State transmission system in respect of Short Term Open Access transactions.	Provisions under sub-regulation-3 is logical when such STOA is sought by Discoms who have already paid full charges for LTOA and MTOA since STOA is provided only when such margin is available. This would ensure that these charges are not loaded twice. But this blanket provision would also absolve entities other than Discoms such as bulk users embedded in Discoms or such bulk users not embedded in Discoms but wants to draw power from Grid by paying CSS and additional surcharge to Discoms. Therefore, a proviso as under may be added: <i>“Provided that the bulk consumers embedded in Discoms and other bulk consumers not embedded in Discoms but availing power through Grid under STOA shall be required to pay transmission charges as may be determined by respective State Electricity Regulatory Commissions”.</i>
Chapter-5 Clause- 21(6)	If a DIC does not provide data, including injection or drawl 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.	For the present, provision of additional transmission charges may not be enforced for a period of at least One year from the date of implementation of these regulations and the same may be reviewed later on.



Senior General Manager (Regulatory)
MPPMCL, Jabalpur