



NTPC Comments on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019



Exemption from Tr. Deviation up to 105%

Regulation 13(2)(c)(ii) provides that In case ex-bus MW injection 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.

When Generator is scheduled up to its full capacity and to provide primary frequency response its generation would go up to 105% of capacity. On these situation generator would be liable to pay Tr. Deviation charges for reasons beyond its control. Similarly there would be unintentional deviations as generation can not be kept constant for the block all the time. Therefore in view of above.

A Generator may be allowed to inject up to 105% of LTA with no Tr. Charge liability.

Part Operationalisation of Long Term Access

As per Draft Regulation 11 (6) the generating station may seek part operationalisation of Long Term Access.

For Generating Stations having sale of power at ex-bus, responsibility of arranging the evacuation of power is on its beneficiaries. LTA agreements are signed by the beneficiaries. Hence request for part operationalization of LTA should be made by LTA customers in such cases.

Regulation may be modified as :

CTU may operationalize the part LTA based on availability of transmission system on request made by LTA customer. (Replace the word from generating station to LTA customer)

Alternate arrangement on Long-term basis . . . Contd

*As per Regulation 11 (7) In case the generating station has achieved COD and transmission system is delayed, the concerned transmission licensee(s) shall make **alternate arrangement** for dispatch of power*

As the alternate arrangement is made against Long Term Access the scheduling in such cases should be under Long Term access and not in Short Term Access.

Regulation 11 (7) may be modified as :

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 the transmission licensee(s). **Scheduling of such power shall be on long term basis.**

Limitation of Transmission Charges liability till CoD

As per Regulation 11 (8) Where construction of dedicated transmission line has been taken up by the Central Transmission Utility as part of coordinated transmission planning 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.

In case of Generators having sale of power on Ex bus basis the Generators have control on CoD of its unit and not on LTA operationalisation, therefore their liability should be governed by the date of CoD only and not by date of LTA operationalization.

Submissions for more clarity on Regulation... Contd

Sharing of Tr. Charges:

Regulation 3 (3) “The transmission charges for transmission system after such transmission system has achieved COD with regular service, shall be shared by DICs in accordance with Regulations 5 to 8 of these regulations.”

In line with the intent of Draft Regulation, this may be reworded as:

The transmission charges for transmission system after such transmission system has achieved COD with regular service, shall be shared by Drawee DICs and Injecting DICs with untied LTA in accordance with Regulations 5 to 8 of these regulations.

Submissions for more clarity

*Regulation 11 (11) provides that in case transmission system has been declared COD but **generating station is delayed** Generating station shall pay the transmission charges of the transmission system till the generating station or unit thereof achieves COD.*

As per intent of the Regulation the Generator has to pay the YTC corresponding to the generating units which have not achieved CoD. Transmission Charges for the capacity which has achieved CoD shall be recovered through the PoC Mechanism.

Accordingly Regulation may be modified as under:

“ ----- generating station or unit thereof is delayed shall pay the Yearly transmission charges of the transmission system till the generating station or unit thereof or the transmission system achieves COD corresponding to capacity of generating station or unit(s) thereof which have not achieved COD.”

Submission for Additional Clauses

To facilitate renewable energy generation through various policy interventions of GOI following provisions may be included :

1. **Transmission charges and losses for the generation projects based on solar or wind resources may be waived if the renewable power generated is used for replacement of thermal power as per GOI Scheme on Flexibility in generation**
2. **No transmission charges and losses shall be payable for Solar Photo Voltaic generation projects based on domestically manufactured content under the CPSU Scheme.**
3. **No transmission deviation charges for drawing the power under RSD or due to scheduled maintenance as both are beyond the control of generator. The drawl of power under scheduled maintenance as certified by RPC was exempted earlier also.**



Migratory Birds at NTPC Dadri

Thank You



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