

----- Forwarded Message -----

From: sneh daheriya <[sneh.daheriya@ptcindia.com](mailto:sneh.daheriya@ptcindia.com)>

To: Sanoj Kumar Jha Secretary <[secy@cercind.gov.in](mailto:secy@cercind.gov.in)>, Shilpa Agarwal <[shilpa@cercind.gov.in](mailto:shilpa@cercind.gov.in)>

Cc: [da@ptcindia.com](mailto:da@ptcindia.com), [rajiv.mishra@ptcindia.com](mailto:rajiv.mishra@ptcindia.com), [rajiv@ptcindia.com](mailto:rajiv@ptcindia.com), [ajit@ptcindia.com](mailto:ajit@ptcindia.com), [harishsaran@ptcindia.com](mailto:harishsaran@ptcindia.com), [rajesh@ptcindia.com](mailto:rajesh@ptcindia.com), [anandkumar@ptcindia.com](mailto:anandkumar@ptcindia.com)

Sent: Tue, 31 Dec 2019 21:28:59 +0530 (IST)

Subject: PTC India Ltd.'s comments/suggestions on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019.

Kind Attn: Shri Sanoj Kumar Jha, Secretary, Central Electricity Regulatory Commission

Sub: PTC India Ltd.'s comments/suggestions on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019.

Respected Sir,

This has reference to the Public Notice dated 31st October, 2019 and 2nd December, 2019 seeking comments /suggestions on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019

PTC India Ltd.'s comments/suggestions for the same are enclosed herewith as Annexure-I for your kind consideration.

Annexure-I

PTC India Ltd's comments on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulation, 2019

Sr. No.

Regulation No.

Proposed Regulations –

Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulation, 2019

PTC's Comments / Suggestions

1

Regulation 10 (3) - sharing of transmission losses

No Transmission loss for ISTS shall be applicable while preparing schedule for injection node including that for collective transaction over the power exchange.

It is understood that no transmission loss shall be applicable for injection node in collective transaction. Kindly clarify that whether transmission losses shall be applicable at withdrawal node. Also, please clarify the treatment at injection/withdrawal node under bilateral transactions over the power exchange.

Since collective transaction under Power Exchange is considered to be a residual power, same treatment may be given of all the power transacted under Short Term mechanism.

2

Chapter (3) – Clause 11(1) (a): Transmission charges in specific cases

No transmission charges and losses for the use of ISTS shall be payable for solar generation for the useful life of the projects commissioned from 01.07.2011 to 30.06.2017.

Please clarify whether transmission charges and losses will be applicable, if a seller (say a Discom) resells renewable power from its pooled sources of power from various generators located in the state to an interstate buyer.

Kindly also clarify the treatment of transmission charges and losses in case the renewable power is transacted under Short Term mechanism, as it is mentioned that the regulation is applicable for medium term and long term open access.

Since majority of the states are coming up with procurement of renewable power under DEEP Portal (Short Term bidding) the applicable charges and losses may be waived off in order to promote renewable power in the states with minimal renewable penetration.

Hard copy of the comments/suggestions are being sent to you separately.

Regards,

Sneh Daheriya

VP, Corporate Strategy and Planning

PTC India Limited

2nd Floor, NBCC Tower, 15 Bhikaji Cama Place,

New Delhi – 110066

Tel: 011 41595105, (M): +91 9818456201

## Annexure-I

### PTC India Ltd's comments on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulation, 2019

Sr. No.	Regulation No.	Proposed Regulations - Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulation, 2019	PTC's Comments / Suggestions
1	Regulation 10 (3) - sharing of transmission losses	No Transmission loss for ISTS shall be applicable while preparing schedule for injection node including that for collective transaction over the power exchange	<p>It is understood that no transmission loss shall be applicable for injection node in collective transaction. Kindly clarify that whether transmission losses shall be applicable at withdrawal node. Also, please clarify the treatment at injection/withdrawal node under bilateral transactions over the power exchange.</p> <p>Since collective transaction under Power Exchange is considered to be a residual power, same treatment may be given of all the power transacted under Short Term mechanism.</p>
2	Chapter (3) – Clause 11(1) (a): Transmission charges in specific cases	No transmission charges and losses for the use of ISTS shall be payable for solar generation for the useful life of the projects commissioned from 01.07.2011 to 30.06.2017.	<p>Please clarify whether transmission charges and losses will be applicable, if a seller (say a Discom) resells renewable power from its pooled sources of power from various generators located in the state to an interstate buyer.</p> <p>Kindly also clarify the treatment of transmission charges and losses in case the renewable power is transacted under Short Term mechanism, as it is mentioned that the regulation is applicable for medium term and long term open access.</p> <p>Since majority of the states are coming up with procurement of renewable power under DEEP Portal (Short Term bidding) the applicable charges and losses may be waived off in order to promote renewable power in the states with minimal renewable penetration.</p>