



PUNJAB STATE POWER CORPORATION LIMITED

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To

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Memo No. :- 1544/45

Dated:- 31-12-2019

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

Ref.: Public Notice No. No.L1/250/2019/CERC dated 31.10.2019

In reference to subject cited context, the comments of PSPCL on draft regulations are as under:-

Regulation no.	Comments
5 (1) to 5(4)	It is proposed that the Transmission Charges towards the Transmission Systems of renewable energy projects should be charged region-wise as per the utilization of the lines by the respective region.
5(2)	It is submitted that transmission capacity & YTC allocated in existing system to grant access to RE capacity should also be included in NC-RE. Then only, it shall give true reflection of transmission charges earmarked for solar capacity.
5(11) of Annexure-I	This is against the provisions of tariff policy and against the principle of 'causer pays'. a. Tariff policy 2016 provides that 'benefit of reduced tariff after the assets have been fully depreciated should remain available to the consumers'. But, by making charges uniform, the advantage of depreciated asset is offset by creation of new costlier assets. b. For the purpose of understanding, if it is assumed that power drawl, system configuration etc for all the states remains same and costly line is built for one state only, then AC-UBC charges of all the states will increase marginally even though drawl pattern and system configurations of all the states except one is same. Therefore, this anomaly should be removed and cost of transmission elements should be taken individually, not uniformly.

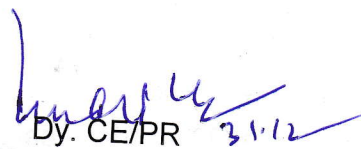
6 (1), 6(2) & 6(4)	It is proposed that the transmission elements to be identified by CTU and the indicative capital cost to be considered by CTU should be finalized in consultation and approval of the state.
7	It is proposed that the Transformer Components to be identified by CTU and the indicative capital cost to be considered by CTU should be finalized in consultation and approval of the state.
9(5)	It has been assumed here that line capability is equal to SIL of the line. However, while SIL gives a general idea of the loading capability of the line, it is usual to load the short lines above SIL and long lines lower than SIL. Therefore, it is suggested that loadability of transmission line should be assumed as thermal limit

The other comment on these proposed regulations is as under:-

1. As per new proposed regulation no separate charges for short term has been proposed. In case Actual drawl of State > (LTA+MToA) then only Transmission Deviation Rate @ 1.2 *Transmission charges for the State has been proposed. But in case a State requires to draw more power for particular months than already approved LTA+MToA then it has to pay huge Transmission Deviation Rate as its actual drawl will always be exceed. Clarification is required for applicability of charges in this case State needs extra corridor for short period of time only.

Further it is also anticipated that there are chances of increase in LTA charges due to abolition of short term charges. This will lead to increase of fix obligation charges of Discoms during their lean season. As PSPCL has nearly 9 months of lean season, when full LTA is not utilized and no immediate exiting option from LTA is available so it is proposed that a draft example PoC charges may also be shared with Discoms as a result of this draft regulations.

This is for your information & further necessary action please.


Dy. CE/PR
PSPCL, Patiala.

CC: EIC/PP&R, PSPCL, Patiala for information please.