

FAX

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सं/No. SRPC/SE II/2016/	7543	दिनांक / Date 15.11.2016

Secretary  
CERC  
NEW DELHI.

Sub: (a) Draft Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) (Sixth Amendment) Regulations, 2016

(b) Draft Central Electricity Regulatory Commission (Sharing of inter-State Transmission Charges & Losses) (Fifth Amendment) Regulations, 2016

Madam,


Kind reference is invited to draft amendments issued by Hon'ble Commission vide Public Notice No. L-1/(3)/2009-CERC & L-1/44/2010-CERC dated 28th October, 2016.

The comments of SRPC Secretariat in this regard are enclosed for kind consideration, please.

Thanking you.

Yours faithfully,

Encl : as above

  
(एस.आर. भट्ट/S.R. BHAT)  
सदस्य सचिव / Member Secretary

Post copy

  
Chief (Engg.)

SRPCCOMMENTS-SHARING\_REGULATION

Regulation No	Existing Regulation	Suggested Regulation	Comments
8(4)	<p>.....</p> <p>Then for the first 20% deviation in any time block, the Designated ISTS Customer shall be required to pay transmission charges for excess generation or demand at the same rate and beyond this limit, the Designated ISTS customer shall be required to pay additional transmission charges which shall be 25% above the zonal Point of Connection charges determined by zone where the Designated ISTS Customer his physically located. Such additional charges shall not be charged to the generators in case of rescheduling of the planned maintenance programme which is beyond the control of the generator and certified to be so by the appropriate RPC. Further, any payment on or account of additional charges for deviation by the generator shall not be charged to its long term customer and shall be payable by the generator.</p>	<p>.....</p> <p>Then for the first 20% deviation in any time block, the Designated ISTS Customer shall be required to pay transmission charges for excess generation or demand at <b>1.35 times the rate</b> and beyond this limit, the Designated ISTS customer shall be required to pay additional transmission charges which shall be <b>1.5 times</b> of the zonal Point of Connection charges determined by zone where the Designated ISTS Customer his physically located. Such additional charges shall not be charged to the generators in case of rescheduling of the planned maintenance programme which is beyond the control of the generator and certified to be so by the appropriate RPC. Further, any payment on or account of additional charges for deviation by the generator shall not be charged to its long term customer and shall be payable by the generator.</p>	<p>Deviation transmission charges need to be at par or above STOA charges. MTOA &amp; STOA charges have been proposed to be enhanced, hence the need to enhance charges for deviation also.</p>
11(7)	<p>For Generators: In case Average MW injected during time block of positive deviation is greater than the sum of Approved Injection, Approved Additional Medium Term Injection and Approved Short Term Injection, then for the first</p>	<p>For Generators: In case Average MW injected during time block of positive deviation is greater than the sum of Approved Injection, Approved Additional Medium Term Injection and Approved Short Term Injection, then for the first</p>	<p>Deviation transmission charges need to be at par or above STOA charges. MTOA &amp; STOA charges have been proposed to be enhanced.</p> <p>For deviation beyond the charges as per present methodology would be <math>1.25 \times 1.35 = 1.69</math>. It may be very</p>

	<p>20% deviation, transmission charges shall be at the zonal Point of Connection charges for the generation zone.</p> <p>For deviation beyond 20%, the additional transmission charges shall be 1.25 times the zonal Point of Connection charges for the generation zone.</p> <p>In case a generation instead of injecting, withdraws from the grid, the additional transmission charges shall be computed as:  <math>(1.25 \times \text{PoC Transmission (rates) for the demand zone in Rs / MW / Time block}) \times (\text{Average MW Withdrawal during time blocks of such negative deviation})</math>.</p>	<p>20% deviation, transmission charges shall be <b>1.35 x</b> zonal Point of Connection charges for the generation zone.</p> <p>For deviation beyond 20%, the additional transmission charges shall be <b>1.5</b> times the zonal Point of Connection charges for the generation zone.</p> <p>In case a generation instead of injecting, withdraws from the grid, the additional transmission charges shall be computed as:  <math>(1.5 \times \text{PoC Transmission (rates) for the demand zone in Rs / MW / Time block}) \times (\text{Average MW Withdrawal during time blocks of such negative deviation})</math>.</p>	<p>high so it is suggested as 1.5 (or a lower figure 1.4 may also be considered)</p>
	<p>For Demand:  In case Average MW withdrawal during time block of positive deviation is greater the sum of Approved Withdrawal. Approved Additional Medium Term Withdrawal and Approved Short Term Withdrawal, then for the first 20% deviation, transmission charges shall be at the zonal Point of Connection charges for the demand zone.</p> <p>For deviation beyond 20%, the additional transmission charges shall be 1.25 times the zonal Point of Connection charges for the demand zone.</p> <p>In case a withdrawing DIC becomes a net inject</p>	<p>For Demand:  In case Average MW withdrawal during time block of positive deviation is greater the sum of Approved Withdrawal. Approved Additional Medium Term Withdrawal and Approved Short Term Withdrawal, then for the first 20% deviation, transmission charges shall be <b>1.35 x</b> zonal Point of Connection charges for the demand zone.</p> <p>For deviation beyond 20%, the additional transmission charges shall be <b>1.5</b> times the zonal Point of Connection charges for the demand zone.</p> <p>In case a withdrawing DIC becomes a net inject the additional transmission charges shall be computed</p>	<p>Deviation transmission charges need to be at par or above STOA charges. MTOA &amp; STOA charges have been proposed to be enhanced.</p> <p>For deviation beyond the charges as per present methodology would be <math>1.25 \times 1.35 = 1.69</math>. It may be very high so it is suggested as 1.5 (or a lower figure 1.4 may also be considered)</p>

	the additional transmission charges shall be computed as: (1.25 x PoC Transmission (rates) for the demand zone in Rs / MW / Time block) x (Average MW Withdrawal during time blocks of such negative deviation).	as: (1.5 x PoC Transmission (rates) for the demand zone in Rs / MW / Time block) x (Average MW Withdrawal during time blocks of such negative deviation).	
Following shall be added after sub para (2) of Para 4 of Regulation 11	For Generators having Connectivity over and above LTA + MTOA. The MTOA shall be considered in addition to LTA only if it is over and above LTA. [Reliability Support Rate in Rs/ MW/month] x [Connectivity Quantum - (LTA + MTOA)]	For Generators having Connectivity over and above LTA + MTOA. The MTOA shall be considered in addition to LTA only if it is over and above LTA <b>(including LTA to target region)</b> . [Reliability Support Rate in Rs/ MW/month] x [Connectivity Quantum - (LTA + MTOA)]	For more clarity
Second proviso to clause (5) of Regulation 11	Provided further that while billing transmission charges for next month, the quantum of Medium-term Open Access to any region shall be adjusted against the quantum of Long-term Access to the target region without identified beneficiaries limited upto quantum of Long Term Access	Intend:- Offset is to be provided only to entity which is paying charges for the same quantum twice.  Methodology-A DIC may be paying an injection POC rate under LTA to target region which may be different from POC rates paid by it under STOA/ MTOA. ( The methodology of calculation of LTA charges are different from SToA charges post 3rd Amendment).  Conclusion – The charges paid by a generator under LTA cannot be correlated with the transmission charges paid by the same generator under SToA for same quantum due to difference in the methodology of calculation.  The transmission charges	Suggestion- Offset needs to be given in terms of Rs only and to the DIC and not to the trader Example Generator A = IC (2000 MW) LTA (1000 MW) LTA (Untied-1000 MW)  Injection rate would be calculated for LTA (Untied-1000 MW) which would be say 10 Cr.  Similarly Let State A = Base Load (7000 MW) Int Gen ( 4000 MW) LTA+MToA (2000 MW) Then SToA+PX (1000 MW) for which the state would have paid.  Assuming a transaction between Gen A and State A under SToA for 1000 MW for which the trader pays 15 Cr (

		<p>for LTA has only one component whereas transmission charges for STOA would have two components injection as well as withdrawal. The offset of injection can be given to generator where as offset of withdrawal needs to be given to Loads.</p>	<p>8Cr injection and 7 Cr withdrawal).</p> <p>This 15 Cr needs to be offset as it is double payment but to the both parties.</p> <p>Hence injection charges can be offset to the Injection DIC and withdrawal to Drawing DIC and not to the trader.</p> <p>Conclusion Offset of STOA needs to be given to two parties both injecting and withdrawal as it is collected from two parties which is not in the case of LTA and which may have resulted into double payment. Hence for each STOA transaction offset needs to be given to two different parties A injection if applicable B to drawing entity if Applicable.</p>
Annexure Sub clause (i) to Para 2.8.1.c	<p>.....For Generator with Long term Access to target region shall be obtained by multiplying these charges by Approved Injection. For Generators whose Connectivity is for quantum more than its LTA+MTOA, Reliability Support Charges shall be obtained by multiplying the above rate by [Connectivity quantum - (LTA+MTOA)].</p>	<p>.....For Generator with Long term Access to target region shall be obtained by multiplying these charges by Approved Injection. For Generators whose Connectivity is for quantum more than its LTA <b>(including LTA to target Region)+MTOA, additional</b> Reliability Support Charges shall be obtained by multiplying the above rate by [Connectivity quantum - (LTA +MTOA)].</p>	For more clarity
“(7) For generators with LTA to target region whose POC rate has not been		<p>Average of the slab rates published by CERC that is 5th Slab may be considered. This would be more appropriate as this would not require averaging the existing slabs and get a new</p>	

determined for the quarter, shall be billed at Average PoC rate of target region		rate.	
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SRPC COMMENTS- Connectivity REGULATION

Regulation No	Existing Regulation	Suggested Regulation	Comments
2(1) (n)/(o)	o) <b>Medium-Term Open Access</b> .....	(n) <b>Medium-Term Open Access</b> .....	As per the updated Compendium <b>Medium-Term Open Access is 2(1) (n)</b>
16B.	<p><b>Underutilisation of Long term Access and Medium term Open Access:</b> In case it is observed by RLDCs that the LTA / MTOA customer's request for scheduling is consistently (for more than 5 days) lower than the capacity granted by the Nodal Agency (i.e. CTU), RLDC may issue a notice to such LTA/MTOA customer asking the reasons for such under-utilization. The LTA/MTOA customer shall furnish the reasons for such under-utilization and will provide such details like the reduced requirement, likely period, etc. by the following day. The un-utilized transfer capability will then be released for scheduling of Medium term and Short-term open access transaction depending upon the period of such underutilization with a condition that such transaction shall be curtailed in the event original LTA/MTOA customer seeks to utilize its capacity.</p>	<p><b>Underutilisation of Long term Access and Medium term Open Access:</b> LTA/MTOA customers shall inform about sustained scheduling lower than capacity granted by the Nodal Agency (DC for ISGS) of more than 2 days (less than 2 days may also be informed). In case it is observed by RLDCs that the LTA / MTOA customer's request for scheduling is consistently (for more than 2 days) lower than the capacity granted by the Nodal Agency (i.e. CTU), RLDC would issue a notice to such LTA/MTOA customer asking the reasons for such under-utilization. The LTA/MTOA customer shall furnish the reasons for such under-utilization and will provide such details like the reduced requirement, likely period, etc. by the end of the day. The un-utilized transfer capability will then be released for scheduling of Medium term and Short-term open access transaction depending upon the period of such underutilization with a condition that such transaction shall be curtailed in the event original LTA/MTOA customer seeks to utilize its capacity.</p>	<p>It has been seen that at times transmission capacity remain utilised due to non-timely information by the Generators/LTA/MTOA customers. It needs to be ascertained that lesser scheduling is not due unit problems (forced/planned outages). If it is due to unit issues the transmission capacity needs to be released for others. If it is due LGB of the purchaser, it could be released with the consent of purchaser , as the 'condition that such transaction shall be curtailed in the event original LTA/MTOA customer seeks to utilize its capacity' would enable them to get their share. The phrase '<i>RLDC may issue a notice to such LTA/MTOA.....</i>' needs to be replaced with '<i>RLDC would issue a notice to such LTA/MTOA.....</i>'</p>
			The detailed procedure of CTU and RLDC (STOA) may require amendment keeping in