



**Thermal Powertech Corporation India Limited
(A Sembcorp Gayatri Company)**

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**No. TPCIL/COM-PS/CERC/16-17/126
15th Nov 2016**

To,
The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building, 36,
Janpath, New Delhi- 110001
Tel No: 011-23753915/011-23753920

Sub: Comments on Draft Central Electricity Regulatory Commission (Grant of Connectivity Regulations-Sixth Amendment) and Sharing of Interstate Transmission Charges- (Fifth Amendment Regulations), 2016.

Ref: 1: No.L-1/44/2010- -CERC Dated 28th Oct 2016 and No.-L-1/(3)/2009-CERC dated 28th Oct 2016

Dear Sir,

This letter is in reference to the above public notice from Hon'ble commission on "Draft Central Electricity Regulatory Commission (Grant of Connectivity Regulations-Sixth Amendment) and Sharing of Interstate Transmission Charges- (Fifth Amendment Regulations), 2016"


We, M/s. Thermal Powertech Corporation India Ltd (TPCIL) are operating 2x660MW power plant in Nellore, AP. Further, M/s. TPCIL actively serving power requirements of Southern States under various Open access agreements/transactions.

In this regard, herewith we are forwarding our comments on the said Draft regulations. It is requested kindly to consider our comments before finalizing above subjected regulations.


Thanking you,

Yours Sincerely,

For Thermal Powertech Corporation India Ltd.


Rajesh Prabhakar Zoldeo
Chief Commercial Officer
Annexure: 1. Comments




Chief (Exec.)

TPCIL Suggestions/Comments on Draft CERC Grant of Connectivity Regulations (Sixth Amendment to Regulations 2010) and Draft CERC Sharing of Interstate Transmission Charges (Fifth Amendment)

SL NO	Clause Reference and Description	Suggestions/Comments
1	“(o) Medium-Term Open Access means the right to use the inter-State Transmission system for a period equal to or exceeding 1 year but not exceeding 5 years;”	<p>It is understood that the term not exceeding 05 years is termed as MTOA in accordance with the guidelines GoI Guidelines for Procurement of Electricity for Medium Term from Power Stations set up on Finance, Own and Operate (FOO) basis dated 10.2.2016</p> <p>However, there is a gap between Medium term (not exceeding 5 years) and Long Term is defined as more than 07 years.</p> <p>A medium PPA holder with 05 years term can definitely fall under Medium term open access if the term of MTOA is not exceeding 07 years .</p> <p><u>Therefore, it is requested to define MTOA exceeding 01 year but not exceeding 07 years</u></p>
2	<p>Clause 15B</p> <p>Provided also that when capacity under existing MTOA are curtailed for considering scheduling of power under the PPA of the Long term Access Customer, such MTOA customer shall be permitted to relinquish its MTOA without any relinquishment charges</p>	<p>This step is welcomed to give priority to LTOA customer and further to avoid double charging of Transmission Charges for the same corridor</p> <p><u>Similarly, the following case may also be considered:</u></p> <p>The Long Term Access Customer who has been granted long term access to a target region and has not operationalized shall enter into Medium term open access for the same target region/beneficiary as LTOA to serve the Power Purchase Agreements and in such case during the term of MTOA, if</p>



		<p>LTOA has been operationalized, the MTOA will be permitted to relinquish its MTOA without any relinquishment charges.</p> <p><u>Reasons:</u> Since no transmission system is created or augmented for the MToA, no additional expenditure is incurred in accommodating the said MToA as it was granted on margin available. Therefore, no loss / damage had occasioned on account of the termination of the said MToA.</p> <p>As per the existing slabs, the POC rates are same for MToA and LToA and there is no under recovery if any LTOA customer (not operationalized) is using MTOA for the reasons beyond his control i.e Discoms coming up with Medium term/Short term PPAs.</p> <p><u>Therefore, there should not be any premium on Transmission charges for LTOA customers who are not availing LTOA (due to the reasons beyond the control of a generator), but supplying under MTOA /STOA as per the PPA guidelines.</u></p>
3	<p>CERC Interstate Transmission Charges Regulations:</p> <p>Clause 4(1)(I) “(1)The transmission charges for MTOA customers who are not availing LTA to target region for the capacity under MTOA shall be charged 1.25 times of the LTA POC rates as notified by the Commission from time to time.</p> <p>(2) The transmission charges for STOA customers who are not availing LTA to target region for the capacity under STOA shall be charged 1.35 times of the normal STOA POC rates as notified by the Commission from time to time.</p>	



[Handwritten Signature]