

RInfra/CERC/Comments/Draft Transmission Planning Regulations/01

June 6, 2017

By Post

Sh. Sanoj Kumar Jha
Secretary,
Central Electricity Regulatory Commission,
3rd and 4th Floor, Chanderlok Building,
36 Janpath,
New Delhi 110 001

Dear Sir,

Sub: Reliance Infrastructure Limited (RInfra) comments/suggestions on 'Draft Central Electricity Regulatory Commission (Transmission Planning and other related matters) Regulations, 2017'

Ref: Public Notice No. L-1/220/2017/CERC dated April 26, 2017

Vide reference above; please find attached the comments/suggestions of Reliance Infrastructure Limited (RInfra) on 'Draft Central Electricity Regulatory Commission (Transmission Planning and other related matters) Regulations, 2017' for kind consideration of the Hon'ble Commission.

We request the Hon'ble Commission to kindly consider the comments/suggestions.


Thanking you,
Yours sincerely



For Reliance Infrastructure Ltd.


Vivek Mishra
Asst. Vice President-Regulatory Affairs

Encl: As above

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13/6/17


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Reliance Infrastructure Limited (RInfra) comments on 'Draft Central Electricity Regulatory Commission (Transmission Planning and other related matters) Regulations, 2017 →

Section of Draft Regulation	Existing Provisions (Ref sections in Draft Regulation)	Proposed by RInfra	RInfra Comments
Section 3 (Definitions)	3.2 Central Study Committee 3.4 Regional Study Committee	To add: 3.(x) State study committee A State Study Committee to be formed under State Govt. and the Committee to be responsible for compilation of data & conducting studies at State level by coordinating with State level licensees.	A separate State Study Committee is required for conducting load flow studies, collecting data & coordinating with State Transmission Licensees for better planning of transmission projects in the state.
Section 8 (Role and responsibilities of STU)	8.2.(a).(ii) (a) To discharge all functions of planning and co-ordination relating to intra-State transmission system with – (ii) State Governments;	To add after (ii): State Govt. in coordination with STU shall involve other Planning authorities/Local bodies in planning of transmission infrastructure	Development of transmission infrastructure i.e. EHV Stations, Transmission lines requires Land & ROW respectively. Under this Regulation, role of State Govt., Planning authority/Local bodies should be specified, so that appropriate provision of land & RoW in the development can be incorporated. STU shall invite such authorities during the meetings to avoid delay due to land/RoW allotment.
Section 18 (Transparency)	18.1.(e) Disclosure of critical infrastructure information and	To add further:	There should be proviso for declaration of "Prohibited Area" for critical transmission

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in the Planning process)	commercially sensitive data with regard to transmission planning shall be governed by the provisions of Section 8 of the Right to Information Act, 2005.	To ensure security for grid by strengthening IT Infrastructure and by covering under "Prohibited Area"	EHV Station. Appropriate IT infrastructure needs to be provided.
Section 18 (Transparency in the Planning Process	18.1.(d) The stakeholders themselves or through an independent third party can replicate the results of transmission planning studies and discrepancies/comments can be furnished to Central Study Committee, Regional Study Committee or CTU or STU.	To add further: Stakeholders can be provided with latest base case.	Base case needs to be shared by CTU/STU with other licensee stakeholders for their independent analysis.
Section 19 (Broad Principles of Transmission Planning)	19.1. (i) Upgradation of existing System	19.1. (i) Upgradation of existing System and replacement/ refurbishment of obsolete technology & equipments after proper residual life assessment study	There should be a provision for replacement or refurbishment of ageing transmission assets.
Section 22 (Classification of Transmission Plans)	22.1 The priority of implementation may be decided depending on type of upgrade	To add further: Method for prioritization rating ought to be defined.	Criteria for implementation & priority should be clearly mentioned in the Regulations. Also a method for prioritization is to be worked out for implementation of schemes under Transmission plans.
Section 22 (Classification of Transmission Plans)	22.4 The last base case file shall be circulated to all Regional Study Committees. All regions will do the study and Central Study Committee	22.4 The last base case and stress case files shall be circulated to all Regional study Committees...	Planning should be based on base case & stress case scenario. Load-flow studies performed both in steady state and dynamic state of operation of a

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Section 23 (Procedure for Transmission Planning)	<p>will combine the studies at national level.</p> <p>23 (n) While planning the transmission system, options of upgrading the existing ISTS in place of building new transmission lines such as increasing line loading through use of compensation, reconductoring, etc. for optimally utilizing the existing assets, should also be considered.</p>	<p>To add further: ...should also be considered in lieu with Implementation of Critical protection systems like Islanding scheme/sectionalizer</p>	<p>transmission network are more useful for planning of future schemes as per STU's rolling plan</p> <p>Procedure for Transmission planning is to ensure special protection system for Transmission network to avoid any grid disturbance. (Reference to Northern Grid Collapse Issue in 2012)</p>
Section 27 (Manpower Deployment in Transmission Planning)	<p>27 Proper and adequate manpower for conducting transmission planning exercise shall be ensured by CTU and STUs. CTU in consultation with STUs shall prepare a scheme for certification of personnel involved in planning at CTU and STU level similar to the system in place for System Operators.</p>	<p>To add further: Also STU in consultation with CTU shall ensure building competency / outcome related occupational standards of manpower related to transmission sector as mentioned in "Power Sector Skill Council (PSSC)" under Skill India initiative. Also STU in consultation with CTU shall design the Training requirements for the Manpower deployed for Transmission Planning across all stakeholders.</p>	<p>Continuous Capacity Buildup of manpower is required to adopt sustainably latest technologies in transmission sector</p>

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Additional Comments			
Section 18 (Transparency in the Planning Process)	-----	STU & CTU shall form Knowledge Sharing Platform at State and Central level respectively and communicate key learning's to all stakeholders.	Knowledge sharing platform at CTU/STU level will envisage communication across various Organizations working upon Transmission Planning.
Section 18 (Transparency in the Planning Process)	-----	CTU & STU while carrying out transmission planning system in the country shall plan secured Data Communication mechanism across transmission stations.	Data Communication across stations should be planned to develop transmission plans in a better way.
Section 20 (Transmission Planning Criteria)	-----	20.2 While specifying the Planning Criteria, CEA shall also consider the following broad principles: x) At least N-2 criteria for Mega/Metro cities xx) Capacity upgradation in existing RoW of OH lines in Urban area	Transmission Planning in urban area is to be done on N-2 criteria basis and capacity uprating on existing RoW of urban area.
Section 22 (Classification of Transmission Plans)	-----	Planning philosophy shall be based on the criteria. The guidelines shall be provided on the following categories 1. Urban Transmission (Mega cities/Metro cities) 2. Semi urban Transmission (City) 3. Rural Transmission area.	Classification will facilitate for smoother execution of the transmission projects