

Himachal Pradesh State Electricity Board Limited

(A State Govt. Undertaking)



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No.HPSEBL/PR&ALDC/CERC/Misc./2019-20- 2985-87 Dated: 31-12-2019
To

**The Secretary,
CENTRAL ELECTRICITY REGULATORY COMMISSION
3rd & 4th Floor, Chandralok Building, 36, Janpath,
New Delhi -110 001.**

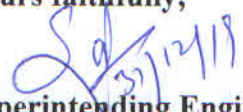
Sub: Draft Notification dated 31st October 2019 on CERC (Sharing of Interstate Transmission Charges and Losses) Regulations, 2019 – Comments thereof.

Sir,

Enclosed please find herewith comments of HPSEBL on the subject cited draft regulations for taking further necessary action at your end please.

DA: As above.


Yours faithfully,


**Superintending Engineer,
PR&ALDC, HPSEB Ltd.,
Totu, Shimla-11**

Copy alongwith enclosure is forwarded to the following for kind information please:

- 1) The Chief Engineer (Sys. Op), HPSEBL, Vidyut Bhawan, Shimla-4
- 2) The Dy. Chief Engineer (I/S), HPSEBL, Totu, Shimla with reference to his office letter No.HPSEBL/CE(SO)/IS-214(b)/Vol.39/2019-20-1625-26 dated 30.12.2019.

DA: As above


**Superintending Engineer,
PR&ALDC, HPSEB Ltd.,
Totu, Shimla-11**

Comments on Draft Notification dated 31st October 2019 on CERC (Sharing of Interstate Transmission Charges and Losses) Regulations, 2019:

2. Definitions

2 (f) “Designated ISTS Customer or DIC” definition do not cover the embedded generator who have not sought the LTA/MTOA from ISTS and have preferred Short Term Transactions only e.g. Malana I HEP (86MW) for the quite long time is not taking LTA or MTOA for ISTS and is selling power in IEX for the past so many years. **Such generators should either be obligated to take LTA for their untied capacity or generators opting short term transactions should be included in the given definition.**

2 (u) “Untied LTA Capacity” definition do not clarify whether Generators opting for Short Term Transactions for their untied capacity are covered.

The term used should be **“Untied Capacity of Injecting DIC”** & definition should be **“Untied Capacity of Injecting DIC” means the quantum of Long Term Access / Medium Term Access and Short Term Access for which buyers have not been identified.**

5. Components and sharing of National Component (NC)

5 (5) Transmission charges for National Component in respect of injecting DICs with untied LTA capacity shall be shared by such injecting DICs in the ratio of their untied LTA capacity.

In the above regulation 5(5), “Untied LTA capacity” be replaced with **“Untied Capacity of Injecting DIC”**

7. Components and sharing of Transformers Component (TC)

7 (1) Transformers Component shall comprise of transmission charges for Inter-Connecting Transformers planned for drawal of power by the State. The list of such transformers for each State shall be provided by the Central Transmission Utility to the Implementing Agency.

In the above regulation 7(1), following be added at the end of line, so as to give clarity of the regulation:

“and details of such transformers & substation feeders connected to neighbouring state actually catering to drawal requirement of state other than the state in which transformer is located are to be given to respective State Discoms / Generators and proportionate transmission charges shall be levied to such state.”

7 (2) Transformers Component of transmission charges shall be borne by the State in which they are located.

In the above regulation 7(2), following be added at the end of line, so as to give clarity of the regulation 7(2):

“provided if the interconnecting transformer is also catering to drawl requirement of neighbouring state other than the State in which transformer is located, proportionate transmission charges shall be levied to such state and details are to be provided to the respective State Discoms.”

8. Components and sharing of AC System Component (ACC)

In the starting of regulation 8, for the clarity of AC system components, following be added:
“AC System Component includes AC transmission lines, AC substation, line and bus reactor and Inter-connecting transformers (excluding the drawal transformers which have been proposed to be shared by the State, SVCs, STATCOMs and such other devices which have been proposed to be shared by region in which they are located).”

8(1) AC System Component shall comprise of transmission charges excluding transmission charges covered under Regulations 5 to 7 of these regulations.

8 (5) Transmission charges covered under AC-BC shall be apportioned to all drawee DICs in the ratio of their quantum of Long term Access plus Medium Term Open Access.

In the above regulation 8(5), following be added at the end of line,so as to give clarity of the regulation:

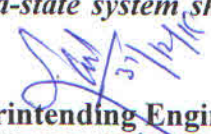
“If a particular transmission system is commissioned for any planned upcoming generating station and the same is not actually commissioned, the charges of such system should not be charged from the DICs and instead these charges be borne by transmission licensees who have constructed the line without any provision for recovery of charges in the case of non- commissioning of such generating station. In case licensee have made provision for liquidity damages, in such casethe liquidity damages recovered / recoverable as per agreement be deducted to arrive the capital cost of transmission asset.

11. Transmission charges in specific cases

11 (10) Where a generating station is connected to both ISTS and intra-State Transmission System, the ISTS charges and losses shall be applicable only on quantum of Long Term Access and Medium Term Open Access connected through ISTS and STU charges and losses shall not be applicable on such capacity connected through ISTS. Provided that this provision shall be subject to availability of adequate capacity in the intra-State Transmission System to draw allocated quantum of Long Term Access or Medium Term Access as certified by the Central Transmission Utility.

In the regulation 11 (10), following be added at the end of line,so as to give clarity of the regulation:

“where the generating station is connected to ISTS through Intra-state system owned by STU and / or Discom, the transmission charges for such Intra-state system shall also be payable for usage of such system by the injecting DIC.”


Superintending Engineer,
PR&ALDC, HPSEB Ltd.,
Totu, Shimla-11