

# Comments on Draft Sharing Regulations

Public Hearing – 29.01.2020

# STOA Transmission Charges for State Embedded Entities

- Draft Regulations have not specified how the ISTS charges incurred by the DICs shall be allocated to the intra-state embedded entities
- Add to the uncertainties of OA consumers embedded in the state network – create difficulties for the embedded customers to avail OA which is already under strain
- State Commissions may follow different approaches to determine the charges to be levied from their respective embedded entities leading to non-uniform development of market
- Hon'ble Commission may kindly stipulate the mechanism for recovery of STOA charges under the proposed Regulations to provide certainty & uniformity on all India basis
  - Transmission charges allocated to DIC on Rs/MW/Month can be recovered based on Rs/MWh depending on the duration for which the OA is availed

- All ISTS charges and losses shall be recovered from the drawl entities
- TDR on Merchant generators (capacity beyond LTA or MTOA) will increase the cost of the generator - prices of electricity in short term market
- Drawl DICs would already be bearing the cost associated with Transmission infrastructure
- TDR on DICs will also skew the participation towards LTA/MTOA until these are delinked from associated PPAs

Thank You