



KSK Mahanadi Power Company Limited

CIN No : U40300TG2009PLC064062

Works

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Ref: CERC,ND/PVSP/2500101/1654

Date: 31-12-2019

To,
Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor,
Chandralok Building,
36, Janpath
New Delhi -110001

Dear Sir,

Sub: Comments/Suggestions/Objections on the Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulation,2019- Reg.

With reference to the notice given by CERC inviting Comments/Suggestions/Objections on the Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019 please find attached our Suggestions/Objections on the same.

Thanking you

Yours truly,

For KSK Mahanadi Power Company Limited


Authorised Signatory





Sl.No	Regulation Clause	Knowledge Actual Draft Regulation	Objection/Suggestion	Reason/explanation
1	Clause 4 of Regulation-5	Transmission charges for the National Component shall be shared by the drawee DICs in the ratio of their quantum of Long term Access plus Medium Term Open Access	Suggest that The transmission Charges of Renewable Energy (NC-RE) other than the transformers components shall be borne by the respective DICs in the ratio of their LTA/MTOAs. The transformer components charges of RE at the interconnecting transformers planned for drawl of power by the state shall be borne by the state.	RE Transmission system are being built for RE generations as injections and drawl state or region as drawl and it also has transformer components at receiving end in a state. Hence whole of transmission charges of RE shall be spilt into two. charges on Transformer component of RE part can be part of transformer component and balance part can be part of National Component.
2	Clause 5 of Regulation-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.	Transmission charges for Untied LTA capacities shall be 40-50% of the National Component. Untied LTA Capacity transmission charges payable by the Injecting DICs/generator shall be net off the STOA charges, if any, paid by the generator.	Reason is present regulations for untied capacities states average transmission charges (PoC) of that region. The ealier reason of charging aaverage of region for untied capacities shall also hlds good for this new proposal. As per the earlier regulation STOA charges if applicable shall be offset against the untied LTA
3	Clause 3 of Regulation-6	Transmission charges covered under sub-clause (a) of clause (1) of this Regulation in respect of injecting DICs with untied LTA capacity, shall be shared by such injecting DICs in the ratio of their untied LTA capacity for the respective target region	40-50% of the Transmission charges covered under sub-clause (a) of clause (1) of this Regulation in respect of injecting DICs with untied LTA capacity, shall be shared by such injecting DICs in the ratio of their untied LTA capacity for the respective target region. Untied LTA Capacity transmission charges payable by the Injecting DICs/generator shall be net off the STOA charges,if any, paid by the generator.	Reason is present regulations for untied capacities states average transmission charges (PoC) of that region. The ealier reason of charging aaverage of region for untied capacities shall also hlds good for this new proposal. As per the earlier regulation STOA charges if applicable shall be offset against the untied LTA
4	Clause 5 of Regulation-6	Transmission charges covered under sub-clause (b) of clause (1) of this Regulation, in respect of injecting DICs with untied LTA capacity, shall be shared by such injecting DICs in the ratio of their untied LTA capacity for the respective target region	40-50% of the Transmission charges covered under sub-clause (b) of clause (1) of this Regulation, in respect of injecting DICs with untied LTA capacity, shall be shared by such injecting DICs in the ratio of their untied LTA capacity for the respective target region. Untied LTA Capacity transmission charges payable by the Injecting DICs/generator shall be net off the STOA,if any, charges paid by the generator.	Reason is present regulations for untied capacities states average transmission charges (PoC) of that region. The ealier reason of charging aaverage of region for untied capacities shall also hlds good for this new proposal. As per the earlier regulation STOA charges if applicable shall be offset against the untied LTA
5	Clause 1 of Regulation-7	Transformers Component shall comprise of transmission charges for inter-connecting transformers planned for drawl 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.	Transformers Component of National Component - Renewable Energy (NC-RE) shall be included in this regulation 7	RE Transmission system are being built for RE generations as injections and drawl state or region as drawl and it also has transformer components at receiving end in a state. Hence whole of transmission charges of RE shall be spilt into two. charges on Transformer component of RE part can be part of transformer component and balance part can be part of National Component.
6	Clause 6 of Regulation-8	Transmission charges covered under AC-BC in respect of injecting DICs with untied LTA capacity shall be shared by such injecting DICs in the ratio of their untied LTA capacity.	40-50% of the Transmission charges covered under AC-BC in respect of injecting DICs with untied LTA capacity shall be shared by such injecting DICs in the ratio of their untied LTA capacity. Untied LTA Capacity transmission charges payable by the Injecting DICs/generator shall be net off the STOA charges,if any, paid by the generator.	Reason is present regulations for untied capacities states average transmission charges (PoC) of that region. The ealier reason of charging aaverage of region for untied capacities shall also hlds good for this new proposal. As per the earlier regulation STOA charges if applicable shall be offset against the untied LTA
7	Clause 9 of Regulation-9	Any other injecting DIC with Long Term Access to target region with untied LTA capacity shall be apportioned charges under AC-UBC which shall be separately indicated by the Implementing Agency	50% of the AC-UBC charges shall be covered under AC-UBC for any other injecting DIC with Long Term Access to target region with untied LTA capacity shall be apportioned charges under AC-UBC. Untied LTA Capacity transmission charges payable by the Injecting DICs/generator shall be net off the STOA charges,if any, paid by the generator.	Reason is present regulations for untied capacities states average transmission charges (PoC) of that region. The ealier reason of charging aaverage of region for untied capacities shall also hlds good for this new proposal. As per the earlier regulation STOA charges if applicable shall be offset against the untied LTA

8	Clause 1 of Regulation-11	No transmission charges and losses for the use of ISTS shall be payable for solar generation for the useful life of the projects commissioned from 1.7.2011 to 30.6.2017.	Only solar generations with untied capacities would fall in this category. The quantum of untied solar generations might be very small.	As per the sub-clause 4 of regulation 5, LTAs, MTOAs granted for Solar / Wind Generations are being a part of national component and charges are already being shared by drawee DICs in the ratio of their quantum of LTAs plus MTOAs. Only left out would be untied capacities of Solar Generators who will fall under this regulation 11. the quantum of such solar generator with untied capacities might brought out.
9	Clause 4 of Regulation-11	Where COD of a generating station or unit(s) thereof is delayed and the Associated Transmission System has achieved COD, which is not earlier than its SCOD, the generating station shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to capacity of generating station or unit(s) thereof which have not achieved COD.	this clause requires to be re-looked. Transmission charges would be only to the extent of BPTA/LTA signed with the Associated Transmission system and it cannot be for the entire plant Capacity.	<p><i>The associated transmission system Generating stations installed capacities and LTA granted are different subjects. Charging YTC of the associated transmission system on the generation capacity of units is not logical.</i></p> <p><i>Associated transmission system like one 400 kV line can take 4 units of 250 MW. under this situation, one unit 250 MW COD requires that associated transmission system ie one DC line. then due to delay in COD of other units will have to pay YTC of that associated transmission system .</i></p> <p><i>The Generation station of capacity 4 x 250 mw is equal to LTA applied by the Generating station from 3 x 250 mw plus LTA applied by the state (1 x 250 MW which is 25%)as per the MOU with the state. later on, the state's share might go for relinquishment of LTA under such conditions the generating stations may sit idle or may get delayed. But the associated transmission system would be completed. Under this situation, the generator has to pay YTC of associated transmission system for the capacity sitting idle or COD delayed (due to relinquishment of state's LTA).</i></p>
10	Clause 7 of Regulation-11	In case the generating station or unit(s) thereof has achieved COD and transmission system is delayed, the concerned transmission licensee(s) shall make alternate arrangement for dispatch of power in consultation with Central Transmission Utility at the cost of the transmission licensee(s).	<i>The capital cost of alternate arrangement shall be at the cost of the transmission licensee(s).</i>	Alternate arrangement is only for short notices and requires huge investment by the generation stations. Hence the capital expenditure of the alternate arrangement shall be at the cost of the transmission licensee(s).
11	Clause 8 of Regulation-11	Where construction of dedicated transmission line has been taken up by the Central Transmission Utility as part of coordinated transmission planning and is constructed by an inter-State transmission licensee, the Yearly Transmission Charges for such dedicated transmission line shall be payable by the generating station in proportion to the Connectivity granted and for which Long Term Access is not operational. Such transmission charges shall be payable to the inter-state transmission licensee who has constructed such dedicated	<i>No change is required in this regulation. however one additional clause requires to be added - The transmission charges for the dedicated transmission line taken up by CTU as a part of coordinated transmission planning and is constructed by ISTS licensee shall be calculated separately and be borne either by the Generator (untied capacities) or by the Generator beneficiaries (with tied up capaities).</i>	Dedicated lines are for that particular generator and needs to be recovered from its beneficairees instead of recoering from all DIC's.

12	Clause 9 of Regulation-11	Generating stations drawing start-up power shall pay.....Provided that where transmission element(s) have been declared COD before its SCOD on request of a generating station for drawal of start-up power, the generating station shall instead pay Yearly Transmission Charges for such transmission element(s) till the generating station achieves COD.Provided further that Transmission Deviation Rate shall not be applicable for generating stations covered under clause (4) of this Regulation for drawal	<p><i>This clause is not very clear.</i></p> <p><i>yearly transmission charges would be lived on what quantum (generation station capacities, LTA grant or on start power quantum).</i></p> <p><i>Secondly, mostly, the time period from start up power drawl to COD would be less than a year. but yearly transmission charges is equalvalent to 12 months time period.</i></p> <p><i>Thirdly, associated transmission system has many lines and sub station and its capacity is more than drawl of start power capacity. its YTC of all associated transmission system would be very very high.</i></p>	
13	Clause 1 of Regulation-12	Implementing Agency shall notify total transmission charges payable by the DICs for the Billing month in terms of Rs. per MW for each State by dividing total transmission charges payable by the State by its quantum of Long Term Access and Medium Term Open Access.	In addiiton the following needs to be added. There shall be three part in transmission charges 1) NC-RE without RE transformer components which would be born by all DIC.2) dedicated line transmission charges which would be born by that generator or its beneficaireis alone.3) balance as per draft regulations.	<p>RE Transmission system are being built for RE generations as injections and drawl state or region as drawl and it also has transformer components at receiving end in a state. Hence whole of transmission charges of RE shall be spilt into two. charges on Transformer component of RE part can be part of transformer component and balance part can be part of National Component.</p> <p>Dedicated lines are for that particular generator and needs to be recovered from that particular generator beneficaireis instead of recovering from all DIC's.</p> <p>The transmission charges for the above two are dedicated to a beneficaireis shall be born by that beneficaireis and shall not charged on to other DIC who are not related to above.</p>