

MB POWER (MADHYA PRADESH) LIMITED

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MBPMPL/ANP-I/CERC/19-20/1273

28th January 2020

The Secretary,

Central Electricity Regulatory Commission (CERC)

3rd & 4th Floor, Chanderlok Building,

36, Janpath, New Delhi-110001.

Sub: *Comments/ Concerns of MB Power (Madhya Pradesh) Limited on the Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019.*

Ref:

1) *Our earlier letter dated 31.12.2019 bearing Ref No. MBPMPL/ANP-I/CERC/ 18-19/1197 furnishing our preliminary comments/ concerns on the draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019.*

2) *Interactive Workshop on the draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019 held with the staff of this Hon'ble Commission on 15.01.2020*

Dear Sir,

We write in continuation to our above referred letter dated 31.12.2019 to this Hon'ble Commission. At the outset we would like to express our sincere gratitude to this Hon'ble Commission for organising an interactive workshop on draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019 (hereinafter referred to as "*Draft Sharing Regulations 2019*") between various stake holders and the staff of this Hon'ble Commission on 15.01.2020. This workshop immensely facilitated a comprehensive understanding of these Draft Sharing Regulations 2019 by us and our various doubts in the correct understanding of these regulations were mitigated to a great extent. During this work-shop, this Hon'ble Commission has been gracious enough to grant a time till 29.01.2020 (i.e. scheduled date of Public Hearing on these regulations) to furnish detailed comments/ concerns/ suggestions by various stake holders for the kind consideration of this Hon'ble Commission while finalising these regulations.

MB POWER (MADHYA PRADESH) LIMITED

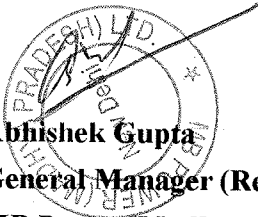
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As such, based on the understanding gathered by us during the said interactive workshop dated 15.01.2020, we are hereby furnishing our detailed comments/ concerns/ suggestions on these Draft Sharing Regulations 2019 (enclosed herewith as *Annexure-1*), in continuation to our preliminary comments/ concerns sent vide our above referred earlier letter dated 31.12.2019 for the kind consideration of this Hon'ble Commission.

We hope this Hon'ble Commission would acknowledge a genuine merit in our comments/ concerns/ suggestions and would consider the same favourably while finalising the Sharing Regulations 2019.

Thanking You

Yours Faithfully,



Abhishek Gupta
General Manager (Regulatory & Commercial)
MB Power (Madhya Pradesh) Limited

CC: Joint Chief (Engineering), Hon'ble CERC – Smt. Shilpa Aggarwal

Annexure-1: MB Power (Madhya Pradesh) Limited's comments/ concerns/ suggestions on the draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019

S. No	Regulation No. of the Draft CERC Sharing Regulations, 2019	Our Comments/ Concerns/ Suggestions
1	5-National Component	<p>We understand that per MW National Component of the ISTS charges shall be same for all the DICs across the Country, irrespective of their location and status. This may be amply clarified in the Regulations.</p>
2	<p>5(2); 5(5)-Sharing of transmission charges of National Component-Renewable Energy (NC-RE) by injecting DICs with untied LTA capacity.</p>	<p>The draft Regulation proposes that the transmission charges for transmission system developed exclusively for RE projects shall be borne by the drawee DICs as well as by the injecting DICs with untied LTA capacity.</p> <p>It may kindly be appreciated that since the benefits from RE projects are entirely being availed by Drawee DICs in order to meet their RPO and their load requirements, as such, the transmission charges for the transmission system developed for evacuation of power from RE projects need to be borne only by the drawee DICs and there is no rationale in apportioning the same on the injecting DICs with untied LTA capacity.</p> <p>It may be further be appreciated that one of the main reasons for non-utilization of the untied LTA capacity by the thermal Generators is increase in RE capacity due to which, the procurer States are hardly inviting any thermal power bids in the market, resulting into non-formalization of such untied LTA capacity against PPAs. Therefore, it would be unreasonable to burden these thermal Generators (who are neither generating RE power nor consuming RE power) by further loading with the transmission charges of National Component-Renewable Component (NC-RE) on their untied LTA capacity.</p> <p>If, National Component-Renewable Energy component of the transmission charges, is loaded on the Generators with untied LTA capacity, it would immensely and unwarrantedly increase their financial liability, who are already reeling under severe</p>

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3	<p>5(3)(d)-Transmission charges of the other HVDC Transmission Systems of the National Component.</p>	<p>financial duress due to enormous billing of untied LTA capacity. <u>As such, it would leave no incentive/ reason for the Generators to continue with the untied LTA capacity and they would be left with no other option but to "Relinquish" such untied LTA capacity.</u> It may kindly be appreciated that the issue of LTA Relinquishment has already drawn a lot of noise in the sector and had led to a spate of pending appeals before the Hon'ble APTEL against this Hon'ble Commission's Order dated 08.03.2019 in Petition 92/MP/2015 (LTA Relinquishment Matter).</p> <p>In view of above, we request this Hon'ble Commission NOT to load the National Component-Renewable Energy (NC-RE) component of the transmission charges on the injecting DICs with untied LTA capacity.</p> <p>The draft Regulation propose that that National Component shall comprise of 30% of the transmission charges of the other HVDC Transmission Systems (except covered under sub-clauses (a), (b) and (c) of the Clause 5(3) of these Draft Sharing Regulations 2019).</p> <p>It may kindly be appreciated that HVDC Transmission Systems having control features provide flexibility and hence more stability to overall Grid, and that bi-pole HVDC lines have been strategically planned for not only bulk power transfer but to enhance the overall operational performance of the national grid. This has been also duly observed and acknowledged in the Jha Committee Report. <u>As such, there is greater need of reducing the asymmetries and flattening the curve of the transmission charges of various States by way of apportioning the transmission charges of these other HVDC Transmission Systems between National Component and Regional Component on 50:50 basis. This would also</u></p>

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		<p>reduce variances between the transmission charges of the various States and would be in the overall interest of “One Nation-One Grid” concept.</p> <p>Accordingly, in the overall interest of the sector, it is humbly proposed that the contribution of the transmission charges of the Other HVDC Transmission Systems (except covered under sub-clauses (a), (b) and (c) of the Clause 5(3) of these Draft Sharing Regulations 2019) in the National Component may be increased from the proposed 30% to a minimum of 50%.</p>
4	7-Transmission charges of the Transformer Component (TC)	<p>We understand that the transmission charges of the Transformer Component (TC) would be restricted only to the State(s) in which the same are located and there would be no incidence of the same on the injecting DICs with untied LTA capacity. This may be amply clarified in the Regulations.</p>
5	8(4)-Transmission charges of the Balance Component of AC System Component (AC-BC).	<p>It is not clear whether the Balance Component of AC System Component (AC-BC) of transmission charges would be computed on Regional Basis or National Basis? i.e. whether the per MW transmission charges of AC-BC would differ for different Regions/ States or would be same for all the DICs across the Country, irrespective of their location and status. This may be amply clarified in the Regulations.</p> <p>Further, if the per MW transmission charges of AC-BC differ for different Regions/ States, then it is not clear how are same would be apportioned on injecting DICs with untied LTA capacity. In such a case, it may be amply clarified that for levy of transmission charges of AC-BC on injecting DICs with untied LTA capacity, which</p>

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6	<p>9(9)-Sharing of transmission charges of the Usage Based Component of the AC System Component (AC-UBC) by injecting DICs with untied LTA capacity.</p>	<p>AC-BC transmission system shall be considered i.e. AC-BC transmission system of the Region where such injecting DIC is located (i.e. Injection Region) or AC-BC transmission system of the region for which LTA was granted on Target-Region basis (Target LTA Region) for such untied LTA capacity.</p> <p>This component is essentially computed on the basis actual usage of AC System by the Drawee State/ DIC. In such a scenario, any injecting DIC with untied LTA capacity shall not be utilizing the AC System for such untied LTA capacity as this capacity is not injected into grid for supply to any firm-up Buyer/ Beneficiary under PPA and hence, such untied LTA capacity does not contribute to actual usage of AC System. It may kindly be appreciated that:</p> <p>(i) While, AC-UBC is essentially based on Marginal Participation Method of the “HYBRID METHODOLOGY FOR USAGE BASED TRANSMISSION CHARGES” proposed under the Draft Sharing Regulations 2019, however levy of transmission charges on injecting DIC with untied LTA capacity is on the principles of Average Participation Method of this methodology. As such, there is no rationale of diluting the principles of Marginal Participation Method for computation of transmission charges of AC-UBC by apportioning the same on the DICs with untied LTA capacity.</p> <p>(ii) Further, the balance transmission charges which are not recovered through AC-UBC (i.e. AC-BC) are already shared by the injecting DICs with untied LTA capacity on the basis of Average Participation Method. Hence the entire transmission charges of the AC System are already getting recovered.</p>

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		<p>As such, loading transmission charges of the AC-UBC on the DICs with untied LTA capacity shall only lead to diluting the basic tenets of Marginal Participation Method adopted for computation of these transmission charges and vitiate the basic spirit of these Regulations.</p> <p>In view of above, we request this Hon'ble Commission NOT to load the AC-UBC component of the transmission charges on the injecting DICs with untied LTA capacity, since such untied LTA capacity is not contributing to actual usage of AC System in anyway.</p>
7	<p>11(3)-Billing of transmission charges of LTA and/or MTOA granted to Generators and tied to a Beneficiary under PPA.</p> <p align="center">AND</p> <p>16(2)-Letter of Credit towards payment security mechanism of transmission charges payable by DIC.</p> <p align="center">AND</p> <p>18(4);18(5)-Event of Default</p>	<p>Currently, with respect to LTA and/or MTOA granted to Generators and tied to PPA for supply of power under such LTA and/or MTOA to its Buyers/ Beneficiaries, the payments towards the transmission charges for such LTA and/or MTOA are being done by the Generators/ Sellers to PGCIL and the same gets reimbursed to such Generators/ Sellers by their respective Buyers/ Beneficiaries under PPA. As such, the Letter of Credit towards the payment security mechanism of transmission charges have been opened by such Generators/ Sellers in favor of PGCIL.</p> <p>However, the Regulation 11(3) proposes direct billing of such LTA and/or MTOA on the Buyers/ Beneficiaries under the PPAs even if LTA and/or MTOA has been granted to the Generators/ Sellers. Therefore, under the new Sharing Regulation, the Buyers/ Beneficiaries (and not Generators/ Sellers) are incumbent to maintain the payment security mechanism in terms of opening of Letter of Credit in favor of PGCIL towards transmission charges for such LTA and/or MTOA.</p>

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		<p>Thus, the Regulation 11(3) has a direct bearing on the Regulation 16(2) and Regulations 18(4) & 18(5), which also require corresponding clarifications/ modifications/ amendments to this effect. Accordingly, is it proposed that:</p> <p>(i) Regulation 16(2) may be suitably modified/ clarify to state that within 30 days of issuance of Final Sharing Regulations, PGCIL shall return the already opened Letter of Credit to the respective Generators/ Sellers and seek new Letter of Credit from the Buyers/ Beneficiaries for such LTA and/or MTOA granted to Generators/ Sellers and tied to PPAs for supply of power to their Buyers/ Beneficiaries</p> <p>(ii) Regulation(s) 18(4) and 18(5) may be suitably modified/ clarify to state that in case of Event of Default by Buyers/ Beneficiaries with respect to the LTA and /or MTOA granted to Generators/ Sellers and tied to PPAs for supply of power to their Buyers/ Beneficiaries, the LTA and/or MTOA so terminated and cancelled shall be on the account of such Buyers/ Beneficiaries and only such Buyers/ Beneficiaries shall be liable to pay relinquishment charges, without having any incidence/ bearing whatsoever of the same on the original Generators/ Sellers to whom such LTA and/or MTOA was granted and such Generators/ Sellers shall continue to interchange power without any restrictions/ curtailments.</p>
8	11(8)-YTC of the dedicated transmission Line constructed by ISTS Licensee as part of ISTS.	Regulation 8(8) of the existing CERC (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) Regulations, 2009 (<i>hereinafter referred to as "Connectivity Regulations 2009"</i>) provides that a thermal generating station of 500 MW and above, other than a captive generating plant,

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		<p>shall not be required to construct a dedicated transmission line to the point of connection and such dedicated transmission lines shall be taken into account for coordinated transmission planning by the CTU and CEA and they shall form a part of ISTS. Further, the Regulation 7(1)(c) of the existing CERC (Sharing of Inter State Transmission Charges and Losses) Regulations, 2010 provides that the dedicated transmission lines constructed, owned and operated by the ISTS Licensees shall be considered to be a part of the Basic Network. <u>Accordingly, this Hon'ble Commission while according the regulatory approval for construction of such dedicated transmission lines by PGCIL as a part of ISTS, under Paragraph 46 of the its Order dated 13.12.2011 in Petition No.154/MP/2011, has clearly directed that recovery of transmission charges (YTC) of such dedicated transmission lines shall be as per the PoC mechanism.</u></p> <p>As such, no separate liability towards transmission charges (YTC) of such dedicated transmission lines was casted out by this Hon'ble Commission on the Generators and the same were prescribed to be recovered as a part of LTA/ MTOA transmission charges under the prevailing PoC mechanism. Based on these directions by this Hon'ble Commission, the Generators like MB Power have not included separate transmission charges (YTC) of such dedicated transmission lines constructed as part of ISTS in its various bids for recovery of these charges from its Buyers/ Beneficiaries under the various signed and operational PPAs.</p> <p>However, the Regulation 11(8) now casts a liability of the transmission charges (YTC) of the residual Connectivity capacity (of such dedicated transmission line constructed as a part of ISTS), for which LTA is not operational, on the Generators. Such a transition from</p>

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		<p>the existing mechanism would not only be in contradiction to the directions of this Hon'ble Commission spelled out in its order dated 13.12.2011 in the Petition No.154/MP/2011, but would also have severe financial repercussion on such Generators like MB Power, as there is no way to ensure recovery of such humungous charges from its Buyers/ Beneficiaries under the various signed and operational PPAs. It may kindly be appreciated that the business decisions with respect to bidding and signing of PPAs by such Generators were taken on the prevailing regulatory conditions at that point in time which casted no financial liabilities towards transmission charges (YTC) of such dedicated transmission lines on the Generators. As such, modifying the "rules of the game" at this juncture would completely jeopardize the financial viability of the existing operational Generating Stations where such dedicated transmission lines have been constructed as part of ISTS. This Hon'ble Commission may kindly appreciate that such generation projects are already reeling under severe financial duress and imposing any financial liabilities on them for no fault on their part would only expose such generation projects to the higher risks of becoming NPAs. At this juncture, saddling the Generators afresh with the transmission charges (YTC) of the residual Connectivity capacity (of dedicated transmission line constructed as a part of ISTS), for which LTA is not operational, and which is partly or fully sold in short term market, would be unfair as:</p> <p>i) Such dedicated transmission lines have been constructed as a part of ISTS and recovery of the YTC of the same is already ensured under the AC System Component of the Draft Sharing Regulations 2019. As such, the same may not be liable to be recovered from the Generators.</p>

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		<p>ii) Further, in the Draft Sharing Regulations 2019, any separate transmission charges for STOA and/ or Collective transactions have been dispensed with and in case aggregate metered ex-bus MW injection of such a Generator, in any time block exceeds the sum of LTA and MTOA, such a Generator shall be charged for such over injection @ TDR which already includes the YTC of such dedicated transmission line constructed as ISTS at the higher rate of 120%.</p> <p>iii) Further, while computation of Relinquishment Charges of LTA by CTU, the YTC of such dedicated transmission line has already been considered by CTU in computation of "Relinquishment Charges" and imposing YTC of such dedicated transmission line on the Generators yet again would amount to double recovery of YTC of such dedicated transmission line from Generators.</p> <p>Accordingly, it is most earnestly requested that the draft Regulation 11(8) NOT be made applicable for the existing Generating Stations and may only be made applicable for the new Generating Stations for which construction of such dedicated transmission line is yet to be taken up by the ISTS licencees(s). Notwithstanding above, if at all this Hon'ble Commission still decides to impose such charges on the existing Generating Stations, then this Regulation 11(8) be made applicable for only those existing Generating Stations, where the operational LTA+MTOA quantum is less than 50% of the Connectivity quantum.</p>

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9	<p>13(2)(c)ii; 13(2)(c)iii; 13(2)(c)v; 13(3)-Billing for over injection (@TDR); STOA and/or Collective transactions.</p>	<p>While the existing concept of separate billing of transmission charges of STOA and/or Collective transactions has been done away with in the Draft Sharing Regulations 2019, however it has been proposed that any over-injection by a Generator in any time-block(s) (over and above the sum of LTA and MTOA) during a month shall attract a Transmission Deviation Rate (TDR) and shall be billed at TDR computed as @ 1.2 times of LTA+MTOA transmission charges of the State where such Generator is located. In this regard, we have following submissions/ requests:</p> <p>(i) As clarified during the interactive workshop held on 15.01.2020, we understand that over-injection by a Generator shall be considered as any injection, which is over and above the aggregate LTA+MTOA capacity granted to either that Generator or its Buyers/ Beneficiaries under PPA. For the sake of avoidance of any confusion and any billing disputes at any later stage, it may be amply clarified in the Regulations that any over-injection by a by a Generator shall be considered as any injection, which is over and above the aggregate LTA+MTOA capacity granted to either that Generator or its Buyers/ Beneficiaries under PPA. For the sake of avoidance of any confusion and any billing disputes at any later stage, it may be amply clarified in the Regulations that any over-injection by a by a Generator shall be considered as any injection, which is over and above the aggregate LTA+MTOA capacity granted to either that Generator or its Buyers/ Beneficiaries under PPA for supply of power from the Generating Station of such a Generator.</p> <p>(ii) The Draft Sharing Regulations 2019 propose that billing of such over-injection @ TDR shall be done on time-block wise basis instead of monthly average schedule basis. However there may be instances when due to various unforeseen events like coal shortage, unscheduled/ forced outage of Generating Station, unviable short term market rates etc., Generators may not be able to sell the entire untied LTA capacity under STOA and/or Collective transactions in some time-blocks, while in the other</p>

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		<p>time-blocks the aggregate quantum of such STOA and/or Collective transactions exceeds the untied LTA capacity. In such a scenario, the Generators shall end-up incurring additional charges for such over-injections even if the monthly aggregate quantum of such STOA and/or Collective transactions is well within the untied LTA capacity. Such a proposed mechanism would be in sharp contrast to the existing Off-setting mechanism which allows the monthly Off-setting of the untied LTA capacity against the aggregate quantum of STOA and/or Collective transactions on a monthly basis and is not specific to time-blocks. Hence, it is earnestly requested that the draft Regulation 13(2)(c)(ii) may be suitably modified to bill over-injection on aggregate basis over a month and NOT on time-block basis.</p> <p>(iii) Draft Sharing Regulations 2019 propose billing the Generator @ TDR towards transmission charges for over-injection on account of STOA and/or Collective transactions. It may be appreciated that there are certain PPAs where the obligation of securing such STOA and payment of transmission charges thereof vests with the Buyers/ Beneficiaries under the PPAs. In such a scenario, since the Generator is saddled with obligation of payment of transmission charges of over-injection on account of STOA and/or Collective transactions, it would be extremely difficult for a Generator to recover such charges from its Buyers/ Beneficiaries under PPAs and the undue benefits in terms of the transmission charges would eventually accrue to such Buyers/ Beneficiaries, who are otherwise obliged to pay for these transmission charges under PPAs. In absence of a suitable billing mechanism for recovery of STOA and/or Collective transactions transmission charges by a Generator from its</p>

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		<p>Buyers/ Beneficiaries) under PPAs, it may lead to a lot of billing disputed amongst such Generator, Buyers/ Beneficiaries and the designated Billing Agency. Hence it is most earnestly proposed that a suitable billing mechanism may be formulated and put in place in the Regulations only for recovery of transmission charges corresponding to STOA and/or Collective transactions by a Generator from its Buyers/ Beneficiaries under the PPAs.</p>
10	<p>20.1-Procedures to be framed under these Regulations.</p>	<p>The Draft Sharing Regulations 2019 propose that Implementing Agency shall notify detailed procedures and formats for calculation of transmission charges within 90 (ninety) days of the notification of these Regulations and post it on its website. It is requested that the various Stakeholders shall be given opportunity to offer comments on the Draft Procedure to be formulated by Implementation Agency and only after consideration of the same by this Hon'ble Commission, the same may be duly approved and issued.</p>
11	<p>Validation of the monthly transmission charges by this Hon'ble Commission.</p>	<p>Currently, as per the prevailing PoC Regulations, Node-wise/ State-wise transmission rates and losses are duly approved and notified by this Hon'ble Commission on quarterly basis, wherein this Hon'ble Commission undertakes a comprehensive validation exercise in consultation with various agencies and stakeholders before approving and publishing such rates and losses. As such, these rates and losses bear a testimony of this Hon'ble Commission, leaving little scope of litigations with respect to transmission charges invoices raised by PGCIL. However, we understand the transmission charges billing mechanism envisaged under the Draft Sharing Regulations 2019 would do-away with</p>

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12	<p>Off-setting of untied LTA capacity of an injecting DIC against the MTOA granted to the Generating Station of such injecting DIC and/or over-injection by such injecting DIC.</p>	<p>the existing practice of regulatory approval/ validation of the transmission rates and losses. In absence of such a regulatory validation exercise and approval, there may be an exponential increase in the billing disputes/ litigations. As such, it is imperative that a periodic regulatory validation and approval mechanism should continue in all the times to come under the new Sharing Regulations.</p> <p>Currently, there are a large number of IPPs (private Generators) in the Country who have a substantial untied LTA capacity. However, due to the existing Off-setting mechanism under the prevailing PoC Regulations, such IPPs are not subjected to any additional monthly transmission charges for such untied LTA capacity as long as aggregate quantum of power transacted on monthly basis under MTOA and/or STOA and/or Collective transactions exceeds or equals such untied LTA capacity. However, the Draft Sharing Regulations 2019 have rendered this existing Off-setting mechanism obsolete and has formulated a new concept towards the same. Although the Draft Sharing Regulations 2019 has attempted to address most of the real time ground situations, however, there are still various issues which require further clarification, a few of them being:</p> <p>(i) Whether the MTOA granted to a Generator (injecting DIC) with untied LTA capacity, shall be adjusted against its untied LTA capacity for the purpose of billing of transmission charges? If Yes, then in such an event, whether only the residual untied LTA capacity of this Generator [i.e. aggregate untied LTA capacity of the Generator minus (-) Quantum of MTOA granted to Generator] shall be considered for the purpose of billing on such Generator (injecting DIC)?</p>

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		<p>(ii) Whether the MTOA granted to the Buyers/ Beneficiaries for drawl of power under the PPA from the Generating Station of the Generator with untied LTA capacity, shall be adjusted against the untied LTA capacity of this Generator for the purpose of billing of transmission charges? If yes, then in such an event, whether only the residual untied LTA capacity of this Generator [i.e. aggregate untied LTA capacity of the Generator minus (-) Quantum of MTOA granted to Buyers: Beneficiaries under the PPA with the same Generator] shall be considered for the purpose of billing on such Generator?</p> <p>(iii) Whether the base LTA+MTOA capacity of the Generating Station, over and above which the over-injection by such injecting DIC (Generator) shall be considered and charged at TDR, would include LTA and/or MTOA granted to the Buyers/ Beneficiaries for drawl of power under PPAs from the Generating Station of this Generator (injecting DIC)?</p> <p>As such, this proposed paradigm shift in the transmission billing mechanism needs to be explained comprehensively through an example covering various possible real time situations. Accordingly, we have proposed an example attempting to cover various possible real time situations under Exhibit-A hereunder. It is requested that the final Sharing Regulations may cover this example (in the main body if possible, or at least in its Statement of Reasons) to provide due clarity in the transmission billing mechanism envisaged under these new Sharing Regulations. This would go a long way in having a clear and unambiguous understanding of these Regulations to all the Stakeholders and minimize the future billing disputes/ litigations</p>

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Exhibit-A: Example

Suppose a 1200 MW operational Thermal Power Project of Generator (say G) is located in Madhya Pradesh (Western Region) with the following Open Access (OAs) and PPAs:

- (i) 300 MW LTA for supply of power to Buyer (say B1) in Madhya Pradesh under the PPA wherein this 300 MW LTA has been granted to the drawing DIC - B1 for drawl of power from the Generating Station of the Generator G.
- (ii) 400 MW LTA for supply of power to Buyer (say B2) in Uttar Pradesh under the PPA wherein this 400 MW LTA has been granted to the Generator G for supply of power to this Buyer - B2.
- (iii) 200 MW Untied LTA granted to Generator G for the Target Region-Northern Region.
- (iv) 150 MW MTOA for supply of power to Buyer (say B3) in Haryana under the PPA wherein this 150 MW MTOA has been granted to the drawing DIC - B3 for drawl of power from the Generating Station of the Generator G.

Scenario-1: With respect to the above example, assuming uniform injection of 850 MW by the Generator G during the each time-block of the month.

- A) Would such an injection by the Generator G during the month be considered as an over-injection? If yes, then what would be the quantum in MW considered as over injection by the Generator G during that month?
- B) What quantum of untied LTA capacity shall be billed on the Generator G? i.e whether it would be 50 MW (after linking 150 MW of MTOA granted to the drawing DIC - B3 against the untied LTA capacity of 200 MW of the Generator G) OR would it be Generator G's entire untied LTA Capacity of 200 MW?
- C) We understand that the Buyers B1, B2 and B3 shall be billed for 300 MW, 400 MW and 150 MW directly. It may be clarified.

Annexure-1: MB Power (Madhya Pradesh) Limited's comments/ concerns/ suggestions on the draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019

Scenario-2: With respect to the above example, assuming the following time-block wise injection pattern of the Generator G during the month:

Time-block	Injection by the Generator G
T ₁	900 MW
T ₂	950 MW
Rest of the Time-blocks(say T _B)	850 MW

A) What would be the quantum in MW considered for billing on the Generator G for Time Blocks T₁, T₂ and T_B respectively?