Ref No: O2PPL/CERC/01 Date: 27/12/2019



To, The Secretary Central Electricity Regulatory Commission 3<sup>rd</sup> & 4<sup>th</sup> Floor, Chandralok Building 36, Janpath New Delhi. 122001

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

Dear Sir,

This is in reference of the above-mentioned draft regulations; Pl. find comments/suggestions (Annexure-1) with request to incorporate the same.

With Warm Regards,

Authorised Signatory

(O2 Power Private Limited)

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		ate Limited Comments / Suggestions ssion Charges and Losses) Regulatior	on "Draft Central Electricity Regulat 1s, 2019."	ory Commission (Sharing of Inter-	
SI.	Reference	Relevant Extract	Proposed Change	Explanation	

SI. No.	Reference	<b>Relevant Extract</b>	Proposed Change ( <del>deletion</del> , addition)	Explanation
1	Insert after	-	"Date of Commercial Operation" or	Unlike the conventional generators, where large
	Regulation		"COD" in relation to a renewable	scale turbine sizes are available, the renewable
	2.(1).(e)		generating station" means the date	generators especially wind, solar, hybrid and
			declared by the generating company	storage usually have smaller unit sizes, and
			after demonstrating	gradually get commissioned in a phased manner.
			availability/installation of 50 MW or	Therefore, the availability of 50 MW or 25% of
			25% of the envisage renewable project	the envisaged renewable capacity should be
			capacity, whichever is higher,	considered for declaration of COD.
			through a successful trial run/test run	
			with or without grid support. The	Since generation from the renewable sources is
			availability/installation of 50 MW or	dependent on natural phenomena, and if not
			25% of the envisaged capacity	utilized, the potential will be lost permanently,
			whichever is higher, shall be verified	unlike an option of fuel storage in conventional
			by an independent and competent	sources and could be used later. Therefore, it is
			authority within three (3) days from	essential to allow optimal utilization of such
			the receipt of such request.	renewable resource and should be considered 50
				MW or 25% of total capacity for the usage of
				transmission corridor.
L			1	

2	Insert after	-	"Renewable Generating Station" or	To define National Component-Renewable
	Regulation		"RGS" means the generating station	Energy (NC-RE), it is crucial to define the
	2.(1).(m)		supplying electrical energy by	Renewable Generating Station (RGS) by the
			utilizing the renewable source of the	MNRE on time to time. We propose for the
			generation which may be declared by	inclusion of hybrid generation and storage of
			the Ministry of New and Renewable	power from renewable resource shall be
			Energy (MNRE), GoI, on time to time.	categorized as RGS.
3	Insert	-	(6) Transmission charges for National	Considering the transmission systems under the
	Regulation		Component shall be allowed to	National Component (NC) is developed with
	5(6)		include into the sharing pool from the	advance planning and may require to build
			date of operationalization of part or	"plug and play" infrastructures, in the national
			full transmission system and shall not	interest. The yearly transmission charge for
			be recovered from transmission	National Component (NC) shall be allowed to
			licensee or generating station before	recover through the sharing pool from the date
			their COD.	of operationalization and should be independent
				of availability or receipt of LTA applications or
			Long Term Access grantees on such	its operationalization.
			system shall bear the equivalent	
			component of yearly transmission	Considering the energy security requirements
			charges in the ratio of their Long Term	Long Term Access grantee at such system shall
			Access unless exempted explicitly as	only be charged relative share unless explicitly
			in regulation 11(1) of these	waived.
			regulations.	

4	Regulation	(ii) Such generation capacity has	(ii) Such generation capacity has been	As per the MoP notifications.
	11(1)(c)(ii)	been declared under commercial	declared under commercial operation	
		operation between 13.2.2018 and	between 13.2.2018 and 31. <del>3</del> 12.2022;	
		31.3.2022;		
5	Regulation	"Where COD of a generating station	"Where COD of a generating station	Yearly Transmission Charges of National
	11.(4)	or unit(s) thereof is delayed, and the	or unit(s) thereof is delayed, and the	Component shall be independent of LTA
		Associated Transmission System	Associated Transmission System has	applications and utilization as per proposed
		has achieved COD, which is not	achieved COD, which is not earlier	Regulation 5(6) above.
		earlier than its SCOD, the generating	than its SCOD, the generating station	
		station shall pay Yearly	shall pay Yearly Transmission	
		Transmission Charges for the	Charges for the Associated	
		Associated Transmission System	Transmission System corresponding	
		corresponding to capacity of	to capacity of generating station or	
		generating station or unit(s) thereof	unit(s) thereof which have not	
		which have not achieved COD.	achieved COD.	
		Provided that such transmission	Provided that such transmission	
		charges shall not be considered	charges shall not be considered under	
		under Regulations 5 to 8 of these	Regulations 56 to 8 of these	
		Regulations."	Regulations."	

6	Regulation	Where Long Term Access to ISTS is	Where Long Term Access to ISTS is	Yearly Transmission Charges of National
Ū	11.(5)	granted to a generating station on	granted to a generating station on	
	11.(3)			
		existing margins and COD of the	existing margins and COD of the	applications and utilization as per proposed
		generating station or unit(s) thereof	generating station or unit(s) thereof is	Regulation 5(6) above.
		is delayed, the generating station	delayed, the generating station shall	
		shall pay transmission charges	pay transmission charges @10% of	
		@10% of transmission charge for	transmission charge for the State	
		the State where it is located for the	where it is located for the quantum of	
		quantum of such Long Term Access.	such Long Term Access.	
		Provided that the amount received	Provided that the amount received on	
		on account of payments in the month	account of payments in the month	
		towards such Long Term Access	towards such Long Term Access	
		shall be reimbursed to the DICs in	shall be reimbursed to the DICs in	
		proportion to their shares under the	proportion to their shares under the	
		First Bill in the following month.	First Bill in the following month.	
		Provided that such Long Term	Provided that such Long Term Access	
		Access shall be excluded for	shall be excluded for computation	
		computation under Regulations 5 to 8	under Regulations $56$ to 8 of these	
		of these regulations.	regulations.	
		or these regulations.	ioguiutons.	
7	Regulation	Where operationalization of Long	Where operationalization of Long	Yearly Transmission Charges of National
	11.(6)	Term Access granted to a generating	Term Access granted to a generating	Component shall be independent of LTA

		station is contingent upon COD of	station is contingent upon COD of	applications and utilization as per proposed
		Associated Transmission System	Associated Transmission System	Regulation 5(6) above.
		consisting of several transmission	consisting of several transmission	
		elements and only some of the	elements and only some of the	
		transmission elements have achieved	transmission elements have achieved	
		COD, the generating station may	COD, the generating station may seek	
		seek part operationalisation of Long	part operationalisation of Long Term	
		Term Access. The Central	Access. The Central Transmission	
		Transmission Utility shall part	Utility shall part operationalize Long	
		operationalize Long Term Access	Term Access corresponding to the	
		corresponding to the capacity sought	capacity sought to be operationalised	
		to be operationalised by the	by the generating station, subject to	
		generating station, subject to	availability of transmission system.	
		availability of transmission system.	The Yearly Transmission Charges for	
		The Yearly Transmission Charges	such transmission elements shall be	
		for such transmission elements shall	included in Regulations 56 to 8 of	
		be included in Regulations 5 to 8 of	these Regulations.	
		these Regulations.	inese Regulations.	
8	proviso in	Where a transmission system has	Where a transmission system has been	Due to the planning of the transmission system
0	Regulation	been declared to have achieved	•	under Regulation 5, part of the transmission
	11(11)	deemed COD in terms of	COD in terms of Transmission	system or generating station may not be
	11(11)			
		Transmission Service Agreement	Service Agreement under Tariff	available for utilisation of the planned system
		under Tariff Based Competitive		for the time being. Since the above system is to
		Bidding (TBCB) or the Commission	or the Commission has approved the	be included in sharing pool from the date of

	has approved the date of commercial	date of commercial operation of such	operationalisation, and drawee DICs of all
	operation of such transmission	transmission system in terms of clause	country share transmission charge for National
	system in terms of clause (2) of	(2) of Regulation 5 of Tariff	Component. Therefore, the associated
	Regulation 5 of Tariff Regulations,	Regulations, 2019 or proviso (ii) to	transmission system or generating station under
	2019 or proviso (ii) to clause (3) of	clause (3) of Regulation 4 of the Tariff	Regulation 5, should be excluded from
	Regulation 4 of the Tariff	Regulations, 2014, the transmission	Regulation 11(11) of these regulations.
	Regulations, 2014, the transmission	licensee or generating company	
	licensee or generating company	whose transmission system or	
	whose transmission system or	generating station or unit thereof is	
	generating station or unit thereof is	delayed shall pay the transmission	
	delayed shall pay the transmission	charges of the transmission system till	
	charges of the transmission system	the generating station or unit thereof	
	till the generating station or unit	or the transmission system achieves	
	thereof or the transmission system	COD.	
	achieves COD.		
		Provided that where more than one	
	Provided that where more than one	transmission licensee or both	
	transmission licensee or both	transmission licensee and generating	
	transmission licensee and generating	station are getting delayed, the	
	station are getting delayed, the	proportionate sharing of above	
	proportionate sharing of above	transmission charges shall be as	
	transmission charges shall be as	decided by Commission.	
	decided by Commission.		
1			

Provided that the transmission	
system developed under Regulation 5	
of these regulations.	

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