



Punjab State Power Corporation Limited

Office of CE/PP&R, PSPCL, Patiala (Pb.)

To

The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Chandernagore Building, 36, Janpath,
New Delhi-110001

Memo. no. 27

Dated: 10.01.20

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

Ref: - This office memo. no. 1544/45 dated 31.12.2019

In continuation to subject cited reference no., additional comments of PSPCL on draft regulations are as under:-

1. Presently power beyond LTA during paddy season is available by paying short term open access (STOA) charges, but in new POC regime this power will have to be availed by paying TDR (Transmission Deviation Rate Charges) which is 120% POC charges. So it will be costlier now and it needs to be reviewed.
2. Currently BBMB assets are not being considered in LTA + MTOA of Punjab, same procedure may be continued in proposed regulations however TDR should be calculated without considering BBMB assets in net drawl
3. In case of embedded entities like railways which are exempted, state pays for transmission deviation charges in case (LTA+MTOA) is less than actual drawl of state. The mechanism of recovery of these charges from embedded entities is not provided in these regulations which may be provided by Hon'ble CERC.
4. Transformers component (TC) :- The transformers are planned as ISTS to cater to the drawl requirement of the state by the CTU. In some cases these are utilized by states other than in which it is located, as such these charges should be utilization based instead of location based.
5. Surge Impedance loading of standard transmission line at a nominal voltage is used to determine utilization percentage of a line. Percentage usage of each transmission line to be multiplied by line-wise monthly transmission charges to obtain line-wise transmission charges. In case of lines loaded more than 100% it is not defined. Hence thermal limit of line to be used to determine percentage utilization of lines.

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6. Non-submission of data :- If a DIC does not provide the required data, including injection or drawl data for intra-State points within stipulated time period, it should be levied an additional transmission charge at the rate 1% of the transmission charges under the first bill for the month. It is pointed out that it should be responsibility of SLDC to provide the required data as 132 kv and above system is managed by PSTCL SLDC.
7. Letter of Credit (Point 16) :- As per this regulation a letter of credit with a term of 12 months and for the amount equal to 1.05 times the average amount of the first bill for a year, where tripartite agreement for securitization on account of arrears against the transmission charges with the government of India exist, needs to be provided by DIC. As distribution utilities referred to as DICs are already over stressed financially as such these should be exempted from this LC clause.


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