



**RP - Sanjiv Goenka  
Group**

Growing Legacies



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RPTCL/2019-20/CERC/470

31<sup>st</sup> December, 2019

**The Secretary,**  
Central Electricity Regulatory Commission,  
3<sup>rd</sup> & 4<sup>th</sup> Floor,  
Chanderlok Building,  
36 Janpath,  
New Delhi -110 001.

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

Dear Sir,

This has reference to the Public notice No. No.L-1/250/2019/CERC dated 31<sup>st</sup> October, 2019 on "**Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019**" issued by Hon'ble Central Electricity Regulatory Commission. The Commission has invited the Stakeholders to provide their comments / suggestions on draft Regulation.

Accordingly, in this regard, kindly find our observations/comments/suggestions enclosed as Annexure to this letter for your kind consideration.

Thanking You.

Yours faithfully,

Venkatesh Baggam

Dy. Manager

Enclosed: As stated above

## RPG Power Trading Co.Ltd Comments/Suggestions

### On Draft (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019.

Sr.no	Clause no	Clause refers to	Comments/Suggestions
1.	Clause 2 of Regulation 5  Clause 5 of Regulation 5	National Component-Renewable Energy shall comprise of transmission charges for transmission systems developed for renewable energy projects as identified by the Central Transmission Utility.  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	The Renewal Energy projects are proposed to be exempted from payment of transmission charges and losses for the transmission corridor (Green corridor) developed for evacuation of power from these projects. In turn the charges and losses for usage of these green corridors are proposed to be borne by all DICs except those exempted RE projects for whom the green corridor was constructed. It is proposed that Hon'ble Commission may kindly consider allocating the cost of the transmission charges towards development of green corridors for the RE projects among the drawee DICs Only.
2.	Clause 3(d) of Regulation 5  Clause 1(a) of Regulation 6	30% of transmission charge for all <b>other HVDC Transmission Systems</b> except those covered under sub-clauses (a), (b) and (c) of this clause of these Regulations  Regional Component of HVDC (RC-HVDC) -70% of transmission charges of HVDC Transmission Systems except those covered under clause (3) of Regulation 5 and clause (6) of Regulation 6	Hon'ble Commission may kindly like to elaborate the basis of percentage share allocation of transmission charges applicable to National (70%) and Regional components (30%). Although some benefit will accrue to all DICs by virtue of HVDC system in terms of increased reliability, it is proposed that Hon'ble Commission may consider 10% of transmission charges in National component as per the existing provision of CERC sharing regulations,2010 to avoid excessive socialising of HVDC cost at National level.



[Signature]

3.	Clause 10 of Regulation 11	Where a generating station is connected to both ISTS and intra-State Transmission System, the ISTS charges and losses shall be applicable only on quantum of Long Term Access and Medium Term Open Access connected through ISTS and STU charges and losses shall not be applicable on such capacity connected through ISTS.	<p>The clause needs further elaboration. In fact the connectivity regulation must address this issue first.</p> <p>The proposed regulation should also bring in clarity for connectivity and applicability of transmission charges and losses (central and state level) of those generating stations who are presently connected to both ISTS system with part of their generation and to STU system with balance part of their generation. Such clarity can bring in flexibility of selling untied capacity from these projects by getting themselves connected to ISTS and STU simultaneously (subject to technical constraints) so that untied capacity from one unit can be sold at minimum transmission charges through state or central transmission system based on nature of contract (inter-state / intra state). Thus, this provision can bring in benefits to these generating companies in terms of competitiveness for having connectivity to both central and state system.</p>
4.	General		<p>For a better clarity, it is requested that Hon'ble commission may kindly elaborate the procedure for refund to all DICs from the amount collected towards MTOA charges which are levied to embedded Intra State entities(eg. OA consumers, IPP's etc.) who doesn't have any LTA or MTOA..</p>
5.	Chapter3 Regulation 11.1.(a),(b),(c)	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	<p>It is given to understand through the MoP order dt. 6<sup>th</sup> Nov 2019, that, the earlier orders dt. 30 Sept 2016 &amp; 14<sup>th</sup> June 2017 have been subsumed and superseded. In view of the above, Hon'ble commission may kindly</p>



	Specific cases	1.7.2011 to 30.6.2017	like to clarify the applicability of contents of Clause 1(a) of regulation 11 of the draft on SOLAR projects commissioned from 1.7.2011 to 30.6.2017 if the project is selling power to a party for fulfilling of its RPO on a negotiated route.
6.	Chapter 4 Regulation 13.2.c.ii	In case aggregate metered ex-bus MW injection or the aggregate metered MW drawal of a DIC, in any time block exceeds the sum of Long Term Access and Medium Term Open Access, the concerned DIC shall be charged for such deviations @ Transmission Deviation Rate.....	Hon'ble CERC may kindly clarify the scenario of any Generator under injecting or any Procurer under Drawing from the schedule in a short term transaction which is in excess of LTA+MTOA to avoid paying transmission deviation rate. This seems likely since the TDR is applicable on actual Generation/Drawl but not on scheduled Generation/Drawl and the entities may under inject or under draw deliberately by paying DSM charges. It is suggested that TDR shall be made applicable on aggregate scheduled ex-bus MW injection or the aggregate scheduled MW drawl of DIC.
7.	Regulation 7.2	Transformers Component of transmission charges shall be borne by the state in which they are located	In case there are drawal by more than one DICs/ States, it should be proportionate to the respective LTA +MTOA. However, appropriate Rationale has to be there. It could be participation factor also on that node where from drawal by more than one DICs are taking place.
8.	Regulation 9.1	The Base Case file shall be prepared by the Implementing Agency for the Peak Block of the month comprising of the following	Instead of Peak Block, Average of the monthly Peak blocks on all working days may be considered.
9.	Regulation 10.1	{Sum of injection into the ISTS at regional nodes for the week) minus (Sum of	Calculation should be blockwise. Net sale in some block by a DIC/State should be considered as injection. In fact the formula should be ( sum of



		<p>drawal from the ISTS at regional nodes for the week)} / Sum of injection into the ISTS at regional nodes for the week X 100 %</p>	<p>Mod of all +ve values of interchange in nth block minus Sum of Mod of all -ve values of interchange in the nth block) / sum of Mod of all +ve values in the nth block x 100%.</p>
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