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No. SRPC/SE-I/2019/7766

दिनांक/ Dated: 2nd December, 2019

सेवामें/ To

Chief (Engineering), CERC,
New Delhi

Subject: -Comments/suggestions regarding implementation of Draft Regulation -reg.
Ref.: Draft Sharing of Inter-State Transmission Charges and Losses Regulations, 2019
notified by CERC on 31st October, 2019

Sir,

Comments/suggestion on the Draft Sharing of Inter-State Transmission Charges and Losses Regulations, 2019 are enclosed at **APPENDIX** for your kind consideration.

भवदीय/Yours faithfully,

संलग्नक:यथोपरि/ Encl: as above

For सदस्य सचिव /Member Secretary

SRPC SECRETARIAT'S COMMENTS ON DRAFT CERC (SHARING OF
ISTS CHARGES AND LOSSES, REGULATIONS 2019

Regulation No /Page No	Regulation as in Draft	Suggested Regulation	Comments
2 (1) (v)	'Yearly Transmission Charges' or 'YTC' means the Annual Transmission Charges as determined or adopted by the Commission for all elements of ISTS which have achieved COD as on the last day of Billing month, and for the transmission lines connecting two States and intra-State transmission lines certified by respective Regional Power Committee as being used for inter-State transmission of electricity.	'Yearly Transmission Charges' or 'YTC' means the Annual Transmission Charges as determined or adopted by the Commission for all elements of ISTS which have achieved COD as on the last day of month prior to Billing month, and for the transmission lines connecting two States and intra-State transmission lines certified by respective Regional Power Committee as being used for inter-State transmission of electricity.	It is better to include which has achieved COD prior to billing month. The element /line may be commissioned towards the end of the month while the peak block of the month may have fallen in the beginning of the month. If the element/line is critical it may have significant impact on flows.
5(3)(b)/7	100% transmission charges for Biswanath Chariali /Alipurdwar – Agra HVDC Transmission System;	100% transmission charges for Biswanath Chariali /Alipurdwar – Agra all HVDC Links (including back to back) except 1495 MW capacity of Mundra – Mohindergarh HVDC Transmission System ;	All HVDC links are likely to be used transfer bulk power in a perspective plan based on RE, Hydro and other energy resources potential. Some of the links may be used in both the directions based on season sometimes on Intra-day also. These links are conceived with national perspective in mind and could be shared by all the DICs of the country.
5(3)(c)/7	Proportionate transmission charges of	If the above 5(3)(b)/7 suggestion is not	Amendment may not be required keeping in view

APPENDIX

	Mundra – Mohindergarh HVDC Transmission System corresponding to 1005 MW capacity; and	accepted then proportionate transmission charges of Mundra – Mohindergarh HVDC Transmission System corresponding to 301.5 MW (30% x 1005 MW) capacity; and	the suggestion for 5(3)(b). Only 30% of the other HVDC is proposed to be shared as NC as per Regulation 5(3)(d)
5(3)(d)/7	30% of transmission charge for all other HVDC Transmission Systems except those covered under subclauses (a), (b) and (c) of this Clause of these regulations.		May be deleted keeping in view the amendment suggestion for 5(3)(b).
5 (4) & (5)	(4) 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. (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.	4) Transmission charges for the National Component shall be shared in the ratio of their quantum of Long term Access plus Medium Term Open Access by the drawee DICs and quantum of untied LTA (including target region) by the injecting DICs with untied LTA capacity (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.	There is no separate National Component in respect of Drawee DICs and the injecting DICs with untied LTA capacity. Total Transmission charges for the National Component (single one) to be shared by Drawee DICs as well as the injecting DICs with untied LTA capacity. To have more clarity modification suggested.
6(1)(a)	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	If the above 5(3)(b)/7 suggestion is not accepted then Regional Component of HVDC (RC-HVDC) -70% of transmission charges of HVDC Transmission Systems except those	The 70% HVDC charges can be shared by DICs of respective region based on usage % rather than loading it to all the DICs of a particular region.

APPENDIX

	(6) of Regulation 6;and	<p>covered under clause (3) of Regulation 5 and clause (6) of Regulation 6; Implementing Agency would notify the usage (upto 2 decimals) of the link in both the directions as per energy injected in the past month and the 70% cost would be borne by the respective region based on usage % of the billing month.</p> <p>All interregional links (AC or HVDC and HVDC back to back) YTC can also be recovered on respective region based on the actual usage for the billing month as suggested above and the YTC of the lines may be removed from AC-UBC.</p>	<p>If the suggestion regarding all interregional links are accepted then accordingly the clauses in respect of HVDC links needs to be modified.</p>
6(1)(b)	<p>Transmission charges for Static Compensator (STATCOM), Static VAR Compensator (SVC), Bus Reactors, and any other transmission element(s)identified by Central Transmission Utility being critical for providing stability, reliability and resilience in the grid.</p>	<p>Transmission charges for 765 kV& above ICTs, Static Compensator (STATCOM), Static VAR Compensator (SVC), Bus Reactors, and any other transmission element(s)identified by Central Transmission Utility being critical for providing stability, reliability and resilience in the grid.</p>	<p>765 kV ICTs are used for bulk transfer of power and can be shared all the DICs of the region rather than by a particular state due to its geographical location.</p>
		<p>If the above 5(3)(b)/7 suggestion is not accepted then New clause 6 (1) (c)</p>	<p>The 70% of the cost for balance capacity could be booked to the regions utilising the</p>

APPENDIX

		Proportionate transmission charges of Mundra – Mohindergarh HVDC Transmission System corresponding to 703.5 MW (70%x 1005 MW) capacity	link as being done for other links.
6 (2) & (3)	<p>(2) Transmission charges covered under sub-clause (a) of clause (1) of this Regulation shall be shared by the Drawee DICs in the ratio of their quantum of Long Term Access plus Medium Term Open Access.</p> <p>(3) 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.</p>	<p>(2) Transmission charges covered under sub-clause (a), (b) & (c) of clause (1) of this Regulation shall be shared by the Drawee DICs of the same region in the ratio of their quantum of (Long term Access plus Medium Term Open Access) and by injecting DICs in untied LTA capacity of the region where it is located.</p>	6 (1) (a) is only one component and to have more clarity.
6 (4) & (5)	<p>(4) Transmission charges covered under sub-clause (b) of clause (1) of this Regulation shall be shared by DICs of the same region in the ratio of their quantum of Long Term Access plus Medium Term Open Access.</p> <p>(5) 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</p>	May be deleted	6 (1) (b) is covered in proposed 6(2)

APPENDIX

	by such injecting DICs in the ratio of their untied LTA capacity for the respective target region.		
7 (1)	Transformers Component shall comprise of transmission charges for inter-connecting transformers planned for drawal 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 except for 765 kV & above shall comprise of transmission charges for inter-connecting transformers planned for drawal 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	765 kV ICTs are used for bulk transfer of power and can be shared all the DICs of the region rather than by a particular state due to its geographical location.
7(2)	Transformers Component of transmission charges shall be borne by the State in which they are located	Transformers Component (except for 765 kV & above) of transmission charges shall be borne by the State in which they are located	765 kV ICTs are used for bulk transfer of power and can be shared all the DICs of the region rather than by a particular state due to its geographical location.
8 (5) & (6)	(5) Transmission charges covered under AC-BC shall be apportioned to all drawee DICs in the ratio of their quantum of Long term Access plus Medium Term Open Access (6) 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.	(5) Transmission charges covered under AC-BC shall be apportioned to all drawee DICs and injecting DICs of the same region in the ratio of their quantum of (Long term Access plus Medium Term Open Access) and untied LTA capacity (including target region).	AC-BC is only one component and to have more clarity.

APPENDIX

9 (4)	<p>Implementing Agency shall run AC load flow studies on the Base Case file stated at clause (1) of this Regulation for the month and determine power flow on each transmission line. Provided that while carrying out the load flow studies, the Implementing Agency may make minor adjustment in the generation and demand data, if required, to ensure load generation balance.</p>	<p>Implementing Agency shall run AC load flow studies on the Base Case file stated at clause (1) of this Regulation for the month and determine power flow on each Transmission line. Provided that while carrying out the load flow studies, the Implementing Agency may make minor adjustment in the generation and demand data, if required, to ensure load generation balance and ISTS drawal of the DICs (as close as possible).</p>	<p>As computations are done for the peak ISTS drawal block so endeavour should be to ensure the ISTS drawal of each DIC corresponding to peak ISTS drawal block.</p>
10(2)	<p>Drawal Schedule of DICs shall be worked out as per provisions of Grid Code after taking into account the transmission losses of previous week as calculated in accordance with clause (1) of this Regulation.</p>	<p>Drawal Schedule of DICs shall be worked out as per provisions of Grid Code after taking into account the transmission losses of W-2 week as calculated in accordance with clause (1) of this Regulation.</p>	<p>Actual losses will be available for W-2 week.</p>
11 (1) (a), (b) & (c)		<p>A new sub proviso can be added Certificate from all entities including Distribution companies would be required to be furnished certifying that the purchase of such generation capacity is for compliance of their renewable purchase obligations (compliance of 1(b) (iii) & 1(c) (iii).</p>	<p>This is presently based on certificate from SPD/WPD; however it needs to be done in more transparent manner. For other requirements like competitive bidding, COD etc CTU certificate may suffice.</p>
11(5)	Where Long Term	Where Long Term	Per MW could be

APPENDIX

	Access to ISTS is granted to a generating station on existing margins and COD of the generating station or unit(s) thereof is delayed, the generating station shall pay transmission charges @10% of transmission charge for the State where it is located for the quantum of such Long Term Access.	Access to ISTS is granted to a generating station on existing margins and COD of the generating station or unit(s) thereof is delayed, the generating station shall pay transmission charges @10% of transmission charge for the State per MW where it is located for the quantum of such Long Term Access.	added for more clarity
11(9)	Generating stations drawing start-up power shall pay the transmission charges @Transmission Deviation Rate for the State in which they are physically located. Provided that the amount received on account of payments towards drawal of start-up power shall be reimbursed to the DICs under the First Bill in proportion to their shares in the First Bill in the month next to Billing month.		Whether RE drawl (before/after COD) is exempted from this transmission deviation charges may kindly be mentioned.
11(12)	An Intra-State Transmission System already certified by the respective Regional Power Committees being used for inter-State transmission of electricity and for which tariff has already been approved by the Commission, shall be covered under these	A new proviso can be added Incentive for Intra-state lines will be considered by CTU based on the availability certificate issued by respective SLDC within a month, else no incentive will be considered. RPCs to follow 50%	Intra-state lines certification needs to be carried out by respective SLDCs. No post facto inclusion of intra-state lines should be allowed. If a region is following 50% criteria while other regions are following 10% criteria, more lines of 10%

APPENDIX

	<p>Regulations: Provided that such intra-State Transmission System shall be included under these Regulations only for the tariff period for which tariff has already been approved by this Commission.</p>	<p>criteria for certification of Intra-state lines as ISTS lines.</p> <p>RPC shall certify the Non-ISTS lines with the above criteria for a year based on the base case furnished by NLDC for the peak ISTS drawal for the previous year.</p>	<p>criteria would be included in AC-UBC and other regions would be burdened with additional usage component. Therefore any uniform criteria needs to be specified by the Commission.</p>
12 (1)	<p>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.</p>	<p>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.</p> <p>There would be no adjustments on account of URS.</p>	<p>URS will be accounted in RTDA.</p>
12(2)	<p>Regional Transmission Accounts for the DICs shall be prepared by the respective Regional Power Committee Secretariat on the basis of:</p> <p>(a) Transmission charges for Long Term Access or Medium Term Open Access to be received from the Implementing Agency;</p> <p>(b) DIC-wise</p>	<p>Regional Transmission Accounts for the DICs shall be prepared by the respective Regional Power Committee Secretariat on the basis of:</p> <p>(a) Transmission charges for Long Term Access or Medium Term Open Access to be received from the Implementing Agency;</p> <p>(b) DIC-wise</p>	<p>Regional Transmission Deviation Accounts will be issued separately</p>

APPENDIX

	<p>transmission charges for the Billing month, in Rs.per MW, to be received from Implementing Agency; and</p> <p>(c) Meter reading to be received from RLDCs, from all Special Energy Meters for computation of deviations from the sum of the Long Term Access and Medium Term Open Access for every time block.</p>	<p>transmission charges for the Billing month, in Rs.per MW, to be received from Implementing Agency; and</p> <p>(e) Meter reading to be received from RLDCs, from all Special Energy Meters for computation of deviations from the sum of the Long Term Access and Medium Term Open Access for every time block.</p> <p>(c)Regional Power Committees Secretariat shall issue Regional Transmission Accounts and Regional Transmission Deviation Accounts for the Billing month within 7 days of communication of data by the Implementing Agency and also display the same on its web site.</p>	
12 (3)	<p>Regional Power Committees Secretariat shall issue Regional Transmission Accounts and Regional Transmission Deviation Accounts for the Billing month within 3 days of communication of data by the Implementing Agency and receipt of meter reading data from RLDCs to all DICs, Central Transmission</p>	<p>Regional Power Committees Secretariat shall issue Regional Transmission Accounts and Regional Transmission Deviation Accounts for the Billing month within 15 days of Regional Transmission Accounts on receipt of meter reading data from RLDCs to all DICs, Central Transmission Utility and inter-State</p>	<p>It may require around 15 days to prepare the RTDA by RPCs as other weekly and energy accounts are to be prepared.</p>

APPENDIX

	Utility and inter-State Transmission Licensees and also display the same on its web site.	Transmission Licensees and also display the same on its web site.	
12 (5)	<p>Timelines for preparation of base case, notification of transmission charges, issue of Regional Transmission Accounts and raising bills shall be as under:</p> <p>(a) Base case for the Billing month shall be prepared by the Implementing Agency by 15th day of the month following the Billing month.</p> <p>(b) Payable transmission charges shall be notified by the Implementing Agency by 25th day of the month following the Billing month.</p> <p>(c) Based on the notified allocation of charges by the Implementing Agency, Regional Power Committee Secretariat shall issue Regional Transmission Accounts by the end of the month following the Billing month.</p>	<p>Timelines for preparation of base case, notification of transmission charges, issue of Regional Transmission Accounts and raising bills shall be as under:</p> <p>(a) Base case for the Billing month shall be prepared by the Implementing Agency by 12th day of the month following the Billing month.</p> <p>(b) Payable transmission charges shall be notified by the Implementing Agency by 23rd day of the month following the Billing month.</p> <p>(c) Based on the notified allocation of charges by the Implementing Agency, Regional Power Committee Secretariat shall issue Regional Transmission Accounts by the end of the month following the Billing month.</p>	<p>It would require around 7 days to prepare the accounts by RPCs.</p>
13(2)	<p>The Second Bill shall be raised to adjust variations on account of any revision in transmission charges as allowed by the Commission including incentives.</p> <p>.....</p>	<p>The Second Bill shall be raised to adjust variations on account of any revision in transmission charges as allowed by the Commission including incentives. The incentive for Intrastate system will be</p>	<p>Intra-state lines certification needs to be carried out by respective SLDCs in a time bound manner.</p>

APPENDIX

		considered based on the certificate issued by respective SLDCs within a month.	
13(2)(c)			Clarity on applicability of Transmission Deviation of RE generators is explicitly required. For RE which are exempted from transmission charges.
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 as determined below.		All cases like embedded entity taking power from outside on STOA/PX or embedded captive units taking power from outside on STOA/PX should not lead to additional charges through Transmission Deviation. Regulation 13 (2) (c) (vii) covers only the transmission deviation by embedded intra-state entity but the whole STOA/PX quantum could result in transmission deviation at State level.
13(2)(c)(iv)	For hydro-generating stations, the transmission deviation shall be calculated after considering overload capacity of 10% over quantum of Long Term Access and Medium Term Open Access.	This clause can be deleted For hydro-generating stations, the transmission deviation shall be calculated after considering overload capacity of 10% over quantum of Long Term Access and Medium Term Open Access.	All generators beyond the LTA + MTOA should pay RTDA
13(3)	No transmission	Short term charges	Suppose an embedded

APPENDIX

	Charges shall be levied for Inter-State transmission system in respect of Short Term Open Access transactions.	could be specified. If they are not specified the STOA/Collective products may have advantage over LTA/MTOA products and it may distort the power market. Further the issues of transmission/RTDA charges embedded generators and embedded consumers within a state would need a back to back agreement.	consumer takes power on STOA it will reflect in RTDA of the state but it cannot recover it from embedded consumer as there are no STOA charges. Else States needs to have agreement with embedded generator /embedded consumer for STOA in respect of Transmission Charges, RTA & RTDA for ISTS. If it comes as Regulation it will be easier as the charges are for ISTS.
13 (4)	Central Transmission Utility shall be responsible for raising the bilateral bills for transmission systems covered under Regulation 11of these regulations.	Following provision may be added at the beginning Details of bilateral billing will be furnished by CTU through Implementing agency to RPCs for it to be included in RTA. Central Transmission Utility shall be responsible for raising the bilateral bills for transmission systems covered under Regulation 11of these regulations.	SR DICs have been emphasising that all bilateral bills details should be included in RTA. The same has been directed by Hon'ble Commission in its Order.
18(1)(a)	A DIC fails to comply with the prevailing regulations including the provisions of the Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2010 as amended from time to time including any		More clarity is required on scope of non-compliance of prevailing regulations including the provisions of the Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2010 by a DIC. Which

APPENDIX

	subsequent re-enactment thereof or is in material breach of these Regulations and such material breach is not rectified by the said DIC within 60 (sixty) days of receipt of notice in this regard from the concerned inter-State Transmission Licensee or the Central Transmission Utility; or		regulations such action can be taken can be specifically mentioned as it may lead termination of a DIC.
21(3)	On or before 7 (seven) days after start of Billing Month, Central Transmission Utility shall submit indicative cost for each voltage level and conductor configuration for transmission lines to the Implementing Agency.	On or before 7 (seven) days after start of Billing Month, Central Transmission Utility shall submit indicative cost for each voltage level and conductor configuration for transmission lines, LTA/MTOA details and bilateral billing details to the Implementing Agency.	LTA/MTOA details needs to be communicated by CTU.
21(4)(b)	Quantum of power tied up through PPAs for interchange of power under long term access or approved medium term open access.	Quantum of power tied up through PPAs for interchange of power under long term access or and approved medium term open access.	
21 (6)	If a DIC does not provide the required data, including injection or drawal data for intra-State points within stipulated time period, it shall be levied an additional transmission charge @ 1% of the transmission charges under the First Bill for the month.	If a DIC does not provide the required data, including injection or drawal data for intra-State points within stipulated time period, it shall be levied an additional transmission charge @ 1% of the transmission charges under the First Bill for the month. This will be used by CTU	Utilization/Settlement of 1% needs to be specified to avoid any ambiguity.

APPENDIX

		for capacity building for the respective region.	
22 (1) (c)	Details of transformers, transmission system for renewables, list of elements considered under Regional Component and corresponding transmission charge considered for the Billing Month;	Details of transformers, transmission system for renewables, list of elements considered under National Component , Regional Component and corresponding transmission charge considered for the Billing Month, bilateral billing details ;	National Component and Bilateral Billing details needs
22(1)		Two new clause may be added as given below : j. Modified line wise YTC taken for the charge computation. k. AC-BC component charge details.	
Annexure-1; 5.3			The treatment of lines/elements in open condition in the peak block base case may be mentioned.
Annexure-1; 5.13	In the process of convergence of the Load Flow on the Basic Network, the IA may require to make certain minor adjustments in the load/generation at various buses to ensure load generation balance.	In the process of convergence of the Load Flow on the Basic Network, the IA may require to make certain minor adjustments in the load/generation at various buses to ensure load generation balance and ISTS drawal of the DICs (as close as possible) .	As computations are done for the peak ISTS drawal block so endeavour should be to ensure the ISTS drawal of each DIC corresponding to peak ISTS drawal block.
Annexure-1; 5.17, 5.19 & 5.20			With Nil generation in base case there would be no charges under AC-UBC. Therefore, the transmission

APPENDIX

			charges are also required to be notified for these generators. These generators may be selling power on STOA but there are no STOA charges applicable.
Annexure-1; 5.17.5	Transmission charges based on Hybrid Methodology in Rs for each DIC in each month will be computed.	<p>If Rs/MW is not to be computed, how Regulations 11(5),11(9), 13 (2) (c) (iii) etc will be implemented</p> <p>A new clause could be added</p> <p>Transmission charge in Rs/MW for each DIC would be computed = $(NC + RC + TC + AC - UBC + AC - BC) / (LTA + MTOA)$ or untied capacity</p>	<p>11 (5) Where Long Term Access to ISTS is granted to a generating station on existing margins and COD of the generating station or unit(s) thereof is delayed, the generating station shall pay transmission charges @10% of transmission charge for the State where it is located for the quantum of such Long Term Access.</p> <p>11 (9) Generating stations drawing start-up power shall pay the transmission charges @Transmission Deviation Rate for the State in which they are physically located.</p> <p>13(2)(c)iii Transmission Deviation Rate shall be calculated as follows: a. Transmission Deviation Rate for a State shall be charged at $1.20 \times$ (transmission charges of the State for the Billing month) / (quantum of Long Term Access plus Medium Term Open Access of the State for the Billing month)</p>

APPENDIX

			b. Transmission Deviation Rate for generating stations and bulk consumers shall be charged @Transmission Deviation Rate for the State where the generating station or bulk consumer is located.
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