



**TATA POWER-DDL**

TPDDL/REGULATORY/2019-20/317

Office of the Head (Regulatory & Legal)

Dec 30, 2019

**The Secretary,**

Central Electricity Regulatory Commission,  
3rd & 4th Floor, Chandralok Building,  
36, Janpath,  
New Delhi-110001.

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

Dear Sir,

This is with reference to Hon'ble Commission's public notice inviting suggestions / comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019.

In this regard, please find enclosed our comments / suggestions on the same, which you may kindly consider while finalising the said Regulations. The said comments have been furnished by Tata Power-DDL without any prejudice to its rights and contentions under applicable laws.

These comments may kindly be taken on record and considered while finalizing the draft Regulations. Hon'ble Commission is requested to grant Tata Power-DDL an effective hearing, to address the Hon'ble Commission on the comments/ suggestions. The comments are annexed herewith as **Annexure-1** (3 hard copies+ soft copy in CD).

Hon'ble Commission may seek any clarification, explanation on the comments furnished by Tata Power-DDL, if it so desires. Tata Power-DDL seeks liberty to file any supplementary, additional submissions, comments in the matter before finalization of the said Regulations.

We hope that you would find the above in order and we shall be pleased to furnish any other information/clarification on the same as and when required.

Thanking You.

Yours Sincerely,

For **Tata Power Delhi Distribution Ltd.**

**Bharat Kumar Bhadawat**  
Head (Regulatory & Legal)

**Encl:** As mentioned above.

**TATA POWER DELHI DISTRIBUTION LIMITED**

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# ANNEXURE-1

## Tata Power-DDL Comments/Suggestions on (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019

### Tata Power-DDL's detailed submission on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019.

Srl. No.	Clause as in the Draft	Tata Power-DDL Comments/ Suggestions
1	<p><b>5. Components and sharing of National Component (NC)</b> (1) National Component shall be the sum of following components: (a) National Component-Renewable Energy (NC-RE); and (b) National Component-HVDC (NC-HVDC).</p> <p>Further, National component HVDC has been subdivided as under: (a) 100% transmission charges for "Back to Back HVDC" Transmission System; (b) 100% transmission charges for Biswanath Chariali/Alipurwar – Agra HVDC Transmission System;</p> <p>(c) Proportionate transmission charges of Mundra–Mohindergarh HVDC Transmission System corresponding to 1005 MW capacity; and (d) <b>30% of transmission charge for all other HVDC Transmission Systems</b> except those covered under sub clauses (a), (b) and (c) of this Clause of these Regulations.</p>	<p>The draft regulation mentions that 30% of transmission charge for all other HVDC Transmission Systems would be covered under "National Component-HVDC". In this regard we find it pertinent to mention that, time and again in various Orders/Discussion papers it finds a mention that HVDC assets are of <b>National importance</b> as their benefits are far reaching. It helps in an enhanced capacity of power flow along with increased Grid stability and reliability of the power transfer due to its inherent technical attributes. Further, it also has been mentioned that power flow in meshed transmission systems comprising of both AC &amp; HVDC lines cannot be segregated. Considering the same we propose that Transmission charges in respect of all HVDC lines and systems should be shared on a national basis without any specific treatment of few HVDC lines. All HVDC lines and systems should be covered under "National Component-HVDC".</p>





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<b>2</b>	<p><b>8. Components and sharing of AC System Component (ACC)</b></p> <p>(1) AC System Component shall comprise of transmission charges excluding transmission charges covered under Regulations 5 to 7 of these Regulations.</p> <p>(2) AC System Component shall be divided into the following components:</p> <p style="margin-left: 20px;">(i) Usage Based Component (AC-UBC); and</p> <p style="margin-left: 20px;">(ii) Balance Component (AC-BC).</p> <p>(3) Transmission charges for AC-UBC shall be shared by DICs corresponding to their respective usage of transmission lines, in accordance with Regulation 9 of these Regulations.</p> <p>(4) Transmission charges under AC-BC shall be the balance transmission charges for AC Transmission system after apportioning the charges for AC-UBC.</p> <p>(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</p> <p>(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.</p>	<p>Provision no 8 of Draft regulation mention that Transmission charges for AC-UBC shall be shared by DICs corresponding to their respective usage of transmission lines &amp; balance transmission charges for AC Transmission System (AC-BC) shall be apportioned to all drawee DICs in the ratio of their quantum of Long term Access plus Medium Term Open Access. Further, separate apportionment of transmission charges is to be done to the injecting DIC's who have LTA to target region. From the above it appears that classification of transmission charges under so many heads will lead to a complicated mechanism of sharing of transmission charges wherein, beneficiaries would not be able to understand their respective usage of transmission systems and breakup of actual transmission charges being paid by them. To overcome this we suggest that charges covered under provisions 8 (3) &amp; 8 (4) should be clubbed together and the same should be calculated/billed on the basis of actual utilization of Transmission networks by each of the DIC's. The sharing of transmission charges may be done on the basis of energy (in MUs) drawn by each of the DIC'S from ISTS during the month. Billing of transmission charges to injecting DICs with untied LTA capacity in the ratio of their untied LTA capacity may be continued as proposed based on MU's determined on routine CUF.</p>
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3	<p><b><u>9. Computation of share of transmission charges under AC-UBC</u></b>  <i>(8) The Implementing Agency shall aggregate transmission charges at dawal nodes within the geographical boundary of the State to determine the allocation of charges for the State under AC-UBC.</i></p>	<p>Provision no 8 of Regulation 9 of the Draft Regulation mention that the Implementing Agency shall aggregate transmission charges at dawal nodes and determine the allocation of charges to various states. We request that the calculation of state wise transmission charges per MW and overall monthly transmission charges to be paid by the states should be illustrated through a suitable example by the implementing agency for proper understanding of DIC's so that beneficiaries should be able to understand the legitimate amount of transmission charges to be paid by them. Further if there is more than one beneficiaries in a state, methodology for sharing of transmission charges within a state on usage basis may also be notified.</p>
4	<p><b><u>11. Transmission charges in specific areas:</u></b>  <i>(1)</i>  <i>(b) No transmission charges and losses for the use of ISTS shall be payable for the Capacity of the generation projects based on solar or wind resources for a period of 25 years from the date of commercial operation of the such generation projects if they fulfill the following conditions:</i>  <i>(i) Such generation capacity has been awarded through competitive bidding.</i>  <i>(c) No transmission charges and losses shall be payable for the generation projects based on solar or wind resources for the use of ISTS, for a period of 25 years from the date of commercial operation of such generation projects if they fulfill the following conditions:</i>  <i>(i) Such generation capacity has been awarded through competitive bidding process in accordance with the guidelines issued by the Central Government;</i></p>	<p>Both 11 (1) (b) (i) and 11(1) (C) (i) talks about waiver of transmission charges and losses for solar and wind resources. However, both provision appears to be similar to each other. We request Hon'ble Commission to please clarify the difference between the applicability of both of the above provisions with specific examples for a clear understanding on the subject matter.</p>
5	<p><b><u>20. Procedures to be framed under these Regulations:</u></b></p>	<p>We request that Beneficiaries/States/Discoms should have and access to the software referred above and they should be able to see/cross-verify the details being used for calculation of individual beneficiary wise transmission rates and</p>





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	<p>(2) The software for the implementation of these regulations shall be audited or cause to be audited by the Commission before it is put to use, and thereafter from time to time as may be decided by the Commission.</p>	<p>charges. The same would enable more clarity to the beneficiaries and will lead to lesser disputes.</p>
<p><b>6</b></p>	<p><b>21. Timeline for furnishing the information:-</b>                  (4) On or before 7(seven) days after end of Billing Month, DICs shall submit following data:                  (a) MW and MVAR Data for injection or drawal at various nodes or a group of nodes for peak block for each Billing Month.                  (b) Quantum of power tied up through PPAs for interchange of power under long term access or approved medium term open access.</p>	<p>Who will be required to submit the data required under provision 21(4) of the draft Regulations, Discoms/State Utilities or the State Load Dispatch center? The same may be clarified. Further, if the data is to be provided in any specific format, the same may be made available to all the DIC's for timely compliance.</p>

