



MP POWER MANAGEMENT COMPANY LIMITED
C.I.N.: U40109MP2006SGC018637 (MP GOVT. UNDERTAKING)
Regd. Office : Shakti Bhawan, Rampur, Jabalpur (M.P.)
482008
Tel.: 0761-2661111, 2660500, Fax : 0761-2661696
Website: www.mppmcl.com



No. CGM (Regulatory)/ 388

Jabalpur, Dated: 07/03/2022

To,

Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chandralok Building
36, Janpath,
New Delhi – 110 001.

Email: secv@cercind.gov.in

Sub: Oral submission during Public hearing (held on 07.03.2022) made before CERC on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to Inter-state Transmission System) Regulations, 2021.

Respected Sir,

Beside our written comments MPPMCL has submitted oral submission on following 4-5 points:

(i) **Transfer of Connectivity and GNA:**

If any person acquires any entity having Connectivity & GNA through acquisition of 51% or more shareholdings or its assets through Insolvency process under IBC, 2016, such person shall be liable to discharge Entity's liability relating to Connectivity and GNA. The liability should not be transferred to beneficiaries under Sharing of Transmission Charges and Losses Regulations, 2020.

- (ii) The GoI, Ministry of Power has notified Rules on 1st Oct 2021 under Section 1176 of Electricity Act, 2003 for Transmission System Planning, Development and Recovery of Interstate Transmission Charges. In regard to relinquishment, the proviso 5(3) provides as under:

"Where a Designated Inter-State Customer desires to relinquish the General Network Access, fully or partly, it may be allowed, subject to satisfactory


Chief General Manager (Regulatory), MPPMCL, Block No.11, Shakti Bhawan, Rampur, Jabalpur 482008 (MP)
Telephone: 0761 – 2702404 E- mail: sanjay.kumar.nema@mppmcl.com

grounds, upon making advance payment of reasonable relinquishment charges as specified by the Central Commission, such that other designated Interstate Customers are not burdened and after full relinquishment of General Network Access by a designated Interstate Customer, it shall be disconnected from the Inter-State Transmission System."

The said notification was made effective from 1st Oct, 2021. Therefore, draft Regulation should also be made effective from 1st Oct, 2021.

- (iii) As per data gathered from website of CTU and RPC, full relinquishment of LTA in Western Region till Dec., 2021 was 11173 MW. Out of 11173 MW, 4569 MW are still connected to ISTS and are supplying power through exchanges, bilateral supply and through Trades (short term supply). This capacity may not be treated as relinquished capacity and they should continue to share the transmission charges as per Sharing Regulations till their complete disconnection from National Grid as per GoI's notification dated 1st Oct, 2021.
- (iv) In Clause 25.1 (d) of draft Regulation, word 'Grid' should be replaced by the word 'National Grid' as Grid is not defined but National Grid is defined in IEGC, 2010.
- (v) The draft notification provides Relinquishment charges equal to 60 times the transmission charges paid by such entity for the last billing month. This should be 120 times as tenure of BPTA is 25 years and tenure of LTOA is 12 years or more.

Kindly consider written as well as oral submission of MPPMCL while finalizing Regulations of Connectivity and GNA.


07/03/2022
General Manager (Regulatory)
O/O CGM (Regulatory)
MPPMCL, Jabalpur

Entities who have relinquished its full capacity, still connected to ISTS and supplying power under STOA				
Region	LTA Granted (MW)	LTA Relinquished (MW)	Full Relinquishment of LTA (MW)	Full Relinquished capacity still connected to ISTS and supplying power through exchanges, bilateral supply and through Trades (short term supply) (MW)
Western Region	27287.40	18734.60	11172.85	4569.35
Eastern Region	14582.00	12279.00	10937.00	
Southern Region	11538.80	7390.80	4408.80	
Northern Region	368.96	368.96	368.96	
Total	53777.16	38773.36	26887.61	

40.8969 %



TRANSMISSION CHARGES FOR DICS 2021-2022 (POSOCO)

Month	Particular	LTA Demand / Injection (in MW)	Usage based AC system charges (₹ Cr)		National Component (₹ Cr)			Regional Component (₹ Cr)	Transformers component (₹ Cr)	Bilateral Charges (₹ Cr)	Total Transmission charges payable in (₹ Cr)
			AC-UBC	Balance AC system charges (₹ Cr)	AC-BC	NC-RE	NC-HVDC				
Apr-21	MP	7972	83.671	127.869	6.627	15.353	10.227	11.276	0.383	255.405	
	India	101173	756.461	1622.777	84.102	194.839	235.433	160.496	65.778	3119.886	
May-21	MP	8246	60.267	153.333	7.526	17.433	11.606	12.484	0.424	263.074	
	India	102035	780.803	1897.232	93.125	215.710	262.541	178.706	57.281	3485.398	
Jun-21	MP	8024	59.341	143.940	7.101	16.425	10.806	11.942	0.411	249.966	
	India	101904	749.586	1827.984	90.180	208.588	253.328	174.188	55.236	3359.090	
Jul-21	MP	8024	61.770	149.722	7.633	16.970	10.981	12.353	0.424	259.853	
	India	101904	763.930	1901.402	96.939	215.513	260.998	182.311	57.342	3478.435	
Aug-21	MP	8024	51.828	142.336	7.468	16.511	10.623	11.954	0.411	241.130	
	India	101581	770.401	1801.904	94.537	209.018	252.208	177.096	55.036	3360.200	
Sep-21	MP	8024	54.088	147.052	7.649	16.912	10.808	12.294	0.424	249.226	
	India	102491	760.433	1878.281	97.697	216.009	260.137	183.272	56.879	3452.708	
Oct-21	MP	8024	58.446	144.625	7.619	16.844	10.729	12.294	0.424	250.982	
	India	102899	816.448	1854.630	97.703	216.009	260.381	184.773	60.829	3490.773	
Nov-21	MP	8024	67.466	136.127	7.779	16.151	10.978	11.898	0.411	250.810	
	India	103854	802.059	1761.851	100.683	209.041	256.151	176.977	67.624	3374.386	
Dec-21	MP	8024	71.039	138.150	9.337	16.693	11.332	12.294	0.424	259.269	
	India	103884	875.298	1788.571	120.881	216.113	265.397	182.827	60.842	3509.930	
Jan-22	MP	8000	75.527	134.947	9.133	16.053	10.904	11.719	0.411	258.694	
	India	104228	818.328	1758.069	118.980	209.141	256.750	177.485	55.109	3393.861	
Feb-22	MP	8037	97.548	134.839	9.822	16.718	11.333	12.110	0.424	282.794	
	India	103839	917.300	1742.073	126.894	215.988	265.734	184.740	51.946	3504.674	
Mar-22	MP	8037	94.778	139.241	10.000	16.713	11.556	12.110	0.424	284.822	
	India	101900	899.534	1765.402	126.792	211.899	266.166	184.318	45.865	3499.974	
Total	MP		835.767	1692.181	97.694	198.776	131.884	144.728	4.995	3106.025	
	India		9710.581	21600.176	1248.513	2537.868	3095.223	2147.189	689.766	41029.317	