

**Comments of APDiscoms on draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022**

Sl. No	Clause No.	Existing Clause	Draft Modification	Remarks
1	5 (4)	The Yearly Transmission Charges for the National Component shall be shared by all drawee DICs and injecting DICs with untied LTA in proportion to their quantum of Long Term Access plus Medium Term Open Access and untied LTA respectively.	The Yearly Transmission Charges for the National Component shall be shared by all the drawee DICs in proportion to their quantum of GNA.	Quantum of GNA includes draws from RE sources for which waiver of ISTS charges and losses is allowed by MoP through separate orders and the same has been incorporated in the existing Regulations. RE component of Yearly Transmission Charges is treated as National Component. Hence the clause is proposed to be modified as following:  The Yearly Transmission Charges for the National Component shall be shared by all the drawee DICs in proportion to their net quantum of GNA after deducting the quantum of RE contracted capacity connected to ISTS.
2	7 (1)	Transformer Component for a State shall comprise of Yearly Transmission Charges for inter-connecting transformers (ICTs) planned for drawal of power by the concerned State. A list of such transformers	The words “along with their associated bays and downstream bays” shall be added before the words “planned for drawal”	Instead of Associated Bays and downstream bays for the Transformer component, HV & LV Bays may be stated.

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		for each State shall be provided by the Central Transmission Utility to the Implementing Agency.		
3	8 (5)	Transmission charges under AC-BC shall be shared by all drawee DICs and injecting DICs with untied LTA in proportion to their quantum of Long Term Access plus Medium Term Open Access and untied LTA respectively.	Transmission charges under AC-BC shall be shared by all drawee DICs in proportion to their quantum of GNA.”	It is requested to be reworded as following: Transmission charges under AC-BC shall be shared by all the drawee DICs in proportion to their net quantum of GNA after deducting the quantum of RE contracted capacity connected to ISTS.
4	11 (1)	Short Term Open Access Rate (in paise/kWh) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under:	T-GNA Rate (in Rs./MW/block) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under: Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) X 1.10 / (number of days in a month X 96 X GNA quantum, in MW, for all such entities located in the State considered for billing, for the corresponding billing period.	The existing methodology of calculating STOA rate may be retained for calculation of T-GNA Rate.
5	11 (3)	Transmission charges for Short Term Open Access paid by an embedded intra-State entity during a month shall be reimbursed in the following billing month to the State in	The words “Short Term Open Access” shall be substituted with the word “T-GNA”	The DICs in which the embedded Drawee entities are located, are bearing the RTDA in respect of the STOA transactions undertaken by such entities. Whereas, the

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		which such entity is located		STOA charges are netted off to the State in which the applicant is located. This is unfair. The clause is to be modified as following:  Transmission charges for T-GNA paid by an embedded intra-State entity during a month shall be reimbursed in the following billing month to the State in which the drawee entity in the transaction is located.
6	11 (6)	Transmission charges for Short Term Open Access collected in a billing month, after adjustment as per Clauses (3) and (4) of this Regulation, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.	Transmission charges for T-GNA collected in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.”	May please be reworded as following: Transmission charges for T-GNA collected in a billing month, shall be reimbursed to the drawee DICs in proportion to their share in the first bill in the following billing month.”
7	12 (3)	The Transmission Deviation charges shall be recovered through the third bill and shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.	The word “drawee” shall be added after words “shall be reimbursed to the”	Existing RTDA rate of 105% of STOA Rate shall be continued.
8	13 (1& 2)	Where COD of a generating station or unit(s) thereof is delayed and the Associated Transmission System has achieved COD,	Provided that in case total drawl schedule (in MW) under GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule	The restriction of taking 75% of maximum schedule corresponding to GNA is not proper. The actual SDT <sub>g</sub> or SDT <sub>tg</sub> needs to be considered

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		<p>which is not earlier than its SCOD, the generating station shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to Long Term Access granted for the generating station or unit(s) thereof, which have not achieved COD:</p>	<p>corresponding to GNA, the “SDTG” shall be taken as 75% of maximum schedule corresponding to GNA for the nth block. Provided that in case total drawl schedule (in MW) under T-GNA through ISTS from all sources for a time-block, is less than 75% of maximum schedule corresponding to T-GNA for the time-block, the “SDTTG” shall be taken as 75% of maximum schedule corresponding to T-GNA.</p>	<p>without any modification. The proposed provision would not render complete exemption to RE generation towards ISTS charges as originally intended by MoP. Further in some instances the maximum drawl schedule could be more than the allotted GNA. Since the calculation is done on Time Block Basis with integration over a period of a month, the ratio shall be taken with reference to actual Generation schedule. The Ministry of Power (MoP) &amp; Ministry of New &amp; Renewable Energy (MNRE) have been very pro active in promoting development of RE capacity in the Country and have set up an ambitious target of 500 GW by 2030. ISTS charges and losses have been waived for the DISCOMs who have contacted for such power for the entire period of PPAs to the extent of 25 Years. This waiver is one of the incentive point which encouraged the State DISCOMs to enter in to PPAs. But now suddenly rolling back</p>

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				<p>this incentive through this Regulation doesn't go in a good taste with DISCOMs. DISCOMS are already in a dilapidated financial position and imposing additional burden of ISTS charges and losses for RE procurement would worsen the situation. Hence it is requested to remove the 75% ceiling as proposed.</p>
9	23 (4)	Not Present	<p><b>New Clause:</b>  <b>“(4) The Implementing Agency shall, within 45 (forty five) days of the notification of this amendment, publish the revised detailed procedures for implementation of the provisions of this amendment after stakeholder consultation.”</b></p>	<p>May please be reworded as follows:</p> <p><b>“(4) The Implementing Agency shall, within 45 (forty five) days of the notification of this amendment, publish the revised detailed procedures for implementation of the provisions of this amendment after stakeholder consultation including the DISCOMs who are having PPAs with the plants connected to ISTS.”</b></p>