



Letter No 189 Patna
HIS Cell-Misc-1080/2016

Dated: - 16/09/2022

From;

Chief Engineer (Power Management Cell)
5th floor BSPHCL
Vidyut Bhawan, Jawahar Lal Nehru Marg,
Patna - 800 001.
Email- powermanagementcell2019@gmail.com

To,

The Secretary
Central Electricity Regulatory Commission
3RD & 4TH Floor, Chanderlok Building,
36 Janpath New Delhi-110001
Email- secy@cercind.gov.in, shilpa@cercind.gov.in

Email

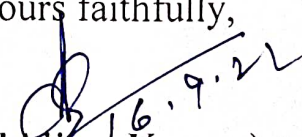
Sub: - Comments/ suggestions/ objections on the Supplementary notification to the Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022, and the draft first amendment issued vide notification dated 11.6.2022.

Ref: - CERC public notice no. L-1/250/2019/CERC dated 18th August, 2022.

Sir,

With respect to subject cited above and public notice under reference, please find enclosed herewith the Comments/ suggestions/ objections of BSPHCL on the Supplementary notification to the Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022, and the draft first amendment issued vide notification dated 11.6.2022, for further needful.

Encl: As above

Yours faithfully,

(Abhijeet Kumar)

R

Comments Of BSPHCL On Sharing of Inter-State Transmission Charges and Losses (First Amendment) Regulations, 2022

<u>Existing Clause of Draft Regulation</u>	<u>BSPHCL Proposal</u>
<p>10.Amendment to Regulation 11 of the Principal Regulations</p> <p>(2) Clause (1) of Regulation 11 of the Principal Regulations shall be substituted as under: “(1) 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.)”</p>	<p>Power Sector in India is experiencing major policy changes and General Network Access is one of them. These policy changes are in their initial phase and yet to attain maturity. The financial health of the Discoms plays a vital role in sustainable growth of the power sector. As the contingency requirement of the Discoms is difficult to forecast in advance, BSPHCL proposes to keep the T-GNA rate (in Rs./MW/block) equivalent to Transmission charges for GNA for the state.</p> <p>BSPHCL Proposal: “(1) 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.)”</p>
<p>(2) Clause (2) of Regulation 12 of the Principal Regulations shall be substituted as under: “(2) <u>Transmission Deviation Rate</u> in Rs./MW, for a State or any other DIC located in the State, for a time block during a billing month shall be computed as under: 1.35 X (transmission charges for GNA of entities located in the State, under first bill for the billing month in Rs.)/ (GNA quantum in MW of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)</p>	<p>BSPHCL proposes to <u>retain</u> the Clause (2) of Regulation 12 of the Principal Regulations wherein Transmission deviation rate in Rs./MW, for a state or any other DIC located in the state, for a time block during the billing month has been computed as under: “1.05 X (transmission charges of the State for the billing month in Rs.)/ (quantum in MW of Long Term Access plus Medium Term Open Access of the State for the corresponding billing period X 2880)”</p> <p>Retaining the Transmission Deviation Rate at 1.05 will not put the additional liability of transmission charge on the Discoms.</p>
<p>Supplementary Draft Notification: 4. Proposed Proviso under Clause (1) of Regulation</p>	<p>In order to ensure that the consumers get green and clean power and secure a healthy</p>

<p>13 of the Principal Regulations for GNA:</p> <p>(1) For GNA: 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 corresponding to GNA, the “SDT_G” shall be taken as 75% of maximum schedule corresponding to GNA for the nth block</p> <p>(2) For T-GNA: 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 “SDT_{TG}” shall be taken as 75% of maximum schedule corresponding to T-GNA.</p>	<p>environment for the future generation, the government has given Must Run status to generating plants running from renewable sources. The Discoms have to draw all the power generated by these plants.</p> <p>It is requested to take “SDT_G”/ “SDT_{TG}”(as the case may be) as 100% of the schedule corresponding to GNA/ T-GNA (as the case may be) for the nth block in case total drawl schedule (in MW) under GNA/ T-GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule</p>
---	---