

To,

Date: 03.10.2022

Secretary,
Central Electricity Regulatory Commission
New Delhi

Subject: Submission of opinion/comments for draft Sharing of Inter- State Transmission Charges and Losses (First Amendment) Regulations 2022

Sir,

This is with reference to the above subject wherein Hon'ble commission by way of public notice No. L-1/250/2019/CERC dated 21.09.2022 has published the proposed draft Sharing of Inter- State Transmission Charges and Losses (First Amendment) Regulations 2022 in exercise of the power conferred by section 178 of Electricity Act 2003, whereby inviting comments/suggestions/objection from the stakeholders and interested persons on the provisions of above draft Regulation.

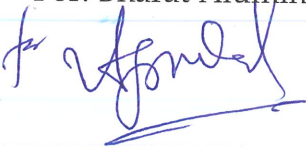
Thus, Bharat Aluminium Company Limited both as Captive Generating Plant as defined in Section 9 of the Act and as a "Captive User" as defined in rule 3(2) of Electricity Rules 2005 submits suggestions on proposed, draft Sharing of Inter- State Transmission Charges and Losses (First Amendment) Regulations 2022

Submitted for your kind consideration.

Thanking you,

Yours faithfully,

For: Bharat Aluminium Company Limited



Authorized Signatory

Draft comment on Sharing of Inter- State Transmission Charges and Losses (First Amendment) Regulations 2022

SN	Section No	Language as per Amedment Regulation	Suggested Modification	Rational/Remarks
1	Clause 4 (1) of Supplementary Draft Notification dated 18.08.22	Nil	<p>Following to be added after Para 2 of Clause 4 (1) i.e after</p> <p><i>(Para 2):</i> Provided that in caseGNA, the “SDTG” shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p> <p><i>(Para 3):</i> "Provided that in case only RE power (i.e No Non-RE power)is drawn (<u>For self-consumption or sale to any entity either through competitive bidding, power exchange or through bilateral billing.</u>) under the total GNA, then in that case 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 “SDTG” shall be taken as 0% of maximum schedule corresponding to GNA for the nth block."</p>	<p>Firstly, GNA would be taken thereafter scheduling of RE power would done.</p> <p>RE power being intermitten in nature and is based on the factors like availability of sun rays, winds etc, thus at many time the actual generation would be less than the schedule and the generator is at the liberty to reschedule the power on real time basis in order to avoid grid indiscipline. This shall reduce the schedule power and in many cases the schedule may be less than the 75% of the GNA. Which would result in unnecessary financial burden on the drawing entity</p>
2	Clause 4 (2) of Supplementary Draft Notification dated 18.08.22	Nil	<p>Following to be added after Para 2 of Clause 4 (2) i.e after</p> <p><i>(Para 2):</i> Provided that in caseT-GNA, the “SDT G” shall be taken as 75% of maximum schedule corresponding to T- GNA for the nth block.</p> <p><i>(Para 3):</i> "Provided that in case only RE power (i.e No Non-RE power)is drawn (<u>For self-consumption or sale to any entity either through competitive bidding, power exchange or through bilateral billing.</u>) under the total GNA, then in that case 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 “SDTG” shall be taken as 0% of maximum schedule corresponding to GNA for the nth block."</p>	
3	Clause 4 (1) of Supplementary Draft Notification dated 18.08.22	<p>“(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNARE), for scheduling power from</p> <p>(i)REGS or RHGS based on wind or solar sources</p> <p>Or</p> <p>(ii)ESS charged with REGS or RHGS based on wind or solar sources:</p> <p>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 “SDTG” shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p>	<p>“(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNARE), for scheduling power from</p> <p>(i)REGS or RHGS based on wind or solar sources</p> <p>Or</p> <p>(ii)ESS charged with REGS or RHGS based on wind or solar sources: <u>For self-consumption or sale to any entity either through competitive bidding, power exchange or through bilateral billing.</u></p> <p>Provided that in case total drawl schedule (in MWh) under GNA through ISTS from (i) & (ii) above all Sources, for a year nth time block, is less 75% of than quantum as defined below: For Solar -25% For Wind- 30% For Hybrid-35% of Maximum schedule corresponding to GNA calculated in MWh for a year, the “SDTG” shall be taken as quantum as defined above, as portion of maximum schedule corresponding to GNA for the nth block the year.</p>	<p>Request to modify the formula to include complete waiver on quantum of power being imported from solar or wind or hybrid sources or Storage, in line with the Ministry of Power’s order dated 14.06.2017, 13.02.2018, 06.11.2019, 05.08.2020, 15.01.2021, 21.06.2021, 23.11.2021 and 30.11.2021</p> <p>The threshold of 75% is impractical owing to the inform nature of generation from solar, wind and solar wind hybrid project. The threshold needs to be rationalized based on the generation pattern of the solar and wind generation calculated at cumulative basis for a year.</p> <p>Solar and wind generation are infirm in nature, dependent on the weather condition. The generation varies on day-to-day basis and month to month so the calculation of GNARE should be done on cumulative generation in a year</p> <p>This will help in easing the unwanted burden of consumers who are procuring power only from renewable source for meeting their renewable purchase obligation or to reduce their carbon footprints.</p>

4	<p>Clause 4 (2) of Supplementary Draft Notification dated 18.08.22</p>	<p>“(1) No transmission charges for the use of ISTS shall be levied for the following T-GNA quantum, for scheduling power from (i)REGS or RHGS based on wind or solar sources Or (ii)ESS charged with REGS or RHGS based on wind or solar sources: Provided that in case total drawl schedule (in MW) under T-GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule corresponding to T-GNA, the “SDTTG” shall be taken as 75% of maximum schedule corresponding to T-GNA.</p>	<p>“(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNARE), for scheduling power from (i)REGS or RHGS based on wind or solar sources Or (ii)ESS charged with REGS or RHGS based on wind or solar sources: For self-consumption or sale to any entity either through competitive bidding, power exchange or through bilateral billing. Provided that in case total drawl schedule (in MWh) under GNA through ISTS from (i) & (ii) above all Sources, for the T-GNA Period nth time block, is less 75% of than quantum as defined below: For Solar -25% For Wind- 30% For Hybrid-35% of Maximum schedule corresponding to T-GNA calculated in MWh for the period, the “SDTTG” shall be taken as quantum as defined above, as portion of maximum schedule corresponding to GNA for the nth block the period. Provided that in case total drawl schedule (in MW) under T-GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule corresponding to T-GNA, the “SDTTG” shall be taken as 75% of maximum schedule corresponding to T-GNA</p>	<p>Request to modify the formula to include complete waiver on quantum of power being imported from solar or wind or hybrid sources or Storage, in line with the Ministry of Power’s order dated 14.06.2017, 13.02.2018, 06.11.2019, 05.08.2020, 15.01.2021, 21.06.2021, 23.11.2021 and 30.11.2021</p> <p>The threshold of 75% is impractical owing to the inform nature of generation from solar, wind and solar wind hybrid project. The threshold needs to be rationalized based on the generation pattern of the solar and wind generation calculated at cumulative basis for a year.</p> <p>Solar and wind generation are infirm in nature, dependent on the weather condition. The generation varies on day-to-day basis and month to month so the calculation of GNARE should be done on cumulative generation in a year</p> <p>This will help in easing the unwanted burden of consumers who are procuring power only from renewable source for meeting their renewable purchase obligation or to reduce their carbon footprints.</p>														
5	<p>Request to include the provision for gradual increase in transmission charges commissioned after 30.06.2025, as provided in MOP Order and reiterated as below:</p>																	
<table border="1"> <thead> <tr> <th>S.No.</th> <th>Period of Commissioning</th> <th>Inter-State Transmission Charges</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>01.07.2025 to 30.06.2026</td> <td>25 % of the applicable ISTS charges</td> </tr> <tr> <td>2</td> <td>01.07.2026 to 30.06.2027</td> <td>50% of the applicable ISTS charges</td> </tr> <tr> <td>3</td> <td>01.07.2027 to 30.06.2028</td> <td>75% of the applicable ISTS charges</td> </tr> <tr> <td>4</td> <td>From 01.07.2028</td> <td>100% of the applicable ISTS charges</td> </tr> </tbody> </table>		S.No.	Period of Commissioning	Inter-State Transmission Charges	1	01.07.2025 to 30.06.2026	25 % of the applicable ISTS charges	2	01.07.2026 to 30.06.2027	50% of the applicable ISTS charges	3	01.07.2027 to 30.06.2028	75% of the applicable ISTS charges	4	From 01.07.2028	100% of the applicable ISTS charges		
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<p>This will assure interest of developers who have a long term investment plan in the country, as these gradual increase in transmission charge will allow ample time for developer to adjust their growth plans without compromising on the pace of growth</p>																		