



भारत सरकार/ Government of India
विद्युत मंत्रालय/ Ministry of Power
केन्द्रीय विद्युत प्राधिकरण/ Central Electricity Authority
आर. ए. प्रभाग/ Regulatory Affairs Division

विषय: केंद्रीय विद्युत नियामक आयोग (अंतर-राज्यीय पारेषण प्रभारों और हानियों का बंटवारा) पर सीईए की टिप्पणियाँ (पहले संशोधन दिनांक 18.08.2022 के अतिरिक्त संशोधन) विनियम, 2022।

Observations of CEA on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (additional amendments of First Amendment dated 18.08.2022) Regulations, 2022.

संदर्भ: एमओपी ईमेल दिनांक 23.08.2022। (MoP email dated 23.08.2022)

उक्त विषय पर सीईए की टिप्पणियों को मंत्रालय के विचारार्थ संलग्न किया गया है ताकि इस मुद्दे को सीईआरसी के साथ उपयुक्त रूप से उठाया जा सके।

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उप. सचिव (R&R), विद्युत मंत्रालय

Annex

Observations of CEA on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (additional amendments of First Amendment dated 18.08.2022) Regulations, 2022

CERC has published a draft of CERC (Sharing of Inter-State Transmission Charges and Losses (First Amendment) Regulations, 2022 vide No. L-1/250/2019/CERC on 11th June 2022. Further, CERC has also published a draft CERC (Sharing of Inter-State Transmission Charges and Losses (additional amendments of First Amendment) Regulations, 2022 vide No. L-1/250/2019/CERC on 18th August 2022, seeking comments/ suggestions/ objections from the stakeholders and interested persons.

We have communicated our comments on the CERC draft amendments dated 11th June 2022 to CERC vide our letter no CEA-EC-15-17/2/2018-RA Division dated 11.07.2022 (copy enclosed). Regarding the 'additional amendments' of CERC dated 18th August 2022, our comments are given below: -

1. CERC draft: Following proviso shall be added in Clause (2) of Regulation 10 of the Principal Regulations":
"Provided that while preparing drawl schedule of DICs in respect of (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources, whose bidding was completed before 15.1.2021, transmission losses shall be considered as zero".

Comment:

Definitions of ESS, REGS and RHGS may be included in the regulation.

2. CERC draft: Clause (1) of Regulation 13 of the Principal Regulations shall be substituted with the provisions as under:
*(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNA_{RE}), 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:
(2) 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:*

Comment:

Ministry of Power issued orders vide no. 23/12/2016-R&R dated 23.11.2021 and 30.11.2021 regarding waiver of Inter State transmission charges on transmission of electricity generated from solar and wind sources of energy, imposing certain conditions for eligibility for different generating stations. MoP order dated 23.11.2021 under para 3.1(ii) (a) & (b) provide that - for Hydro pumped storage plant, at least 51% of the annual

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electricity requirement for pumping of water in the plant should be met by use of energy generated from solar and/ or wind power plants. Similar condition is imposed for Battery Energy Storage System (BESS) also. **These eligibility conditions are not reflected in the draft CERC regulation and all the RE generators are exempted Inter State transmission charges. As such, CERC regulation should contain these provisions as given in the MoP order.**

3. Also para 3.1 (v) of the MoP order dated 23.11.2021 provide that - for hydrogen plants where hydrogen is produced using the electricity from recognized RE sources and which get commissioned up to 30.06.2025, the waiver of Inter State transmission charges shall be applicable for a period of 8 years from the date of commissioning of such hydrogen plant. **Accordingly, this applicable period needs to be suitably included in the CERC regulation.**

4. Further, under para3.2 of the said order, it is provided that -

In order to have long term visibility and certainty to the renewable power generation, it is also provided that ISTS charges shall be levied for the solar, wind, Hydro PSP and BESS Projects commissioned after 30.06.2025, gradually as per the following trajectory: -

<i>S. No.</i>	<i>Period of Commissioning</i>	<i>Inter-State Transmission Charges</i>
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

These provisions are also not reflected in the draft CERC regulation, and as such may be suitably provided by CERC.

5. Under para3.3 of MoP amendment order dated 30.11.2021, following is provided –

“ISTS charges shall be waived for Solar PV power plants commissioned under SECI Tender for manufacturing linked capacity scheme (RFS No SECI/C&P/RfS/2GW/ Manufacturing/P-3/R1/062019 dated 25.06.2019) for sale to entities having RPO, irrespective of whether this power is within RPO or not.”

This aspect should also be included in the CERC regulation.

6. Under para 4 of the MoP order dated 23.11.2021, waiver of Inter State transmission charges shall be applicable for a period of 25 years for solar, wind and Hydro PSP or for a period of 12 years for BESS or for a period subsequently notified future projects by the Central Government, from the date of commissioning of the power plant.

These respective periods of waiver are also not reflected in the draft CERC regulation.



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आर. ए. प्रभाग/ Regulatory Affairs Division
(E&C Wing)

विषय: Comments of CEA on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022.

Reference is invited to the draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses (First Amendment) Regulations, 2022 published vide No. L-1/250/2019/CERC on 11th June 2022, seeking comments/ suggestions/ objections from the stakeholders and interested persons. In this regard, the comments is given below:

1. (2). Amendment to Regulation 2 of the Principal Regulations:

(i) Sub-clause (h) of Clause (1) of Regulation 2 of the Principal Regulations shall be substituted as under:

(h) 'Drawee DIC' shall mean the DICs which draw power through ISTS but does not include ESS"

Comment:

Sub-clause (h) of the principal regulation is regarding connectivity regulation. Therefore, it may be substituted as:

(h) Connectivity Regulations means the CERC Connectivity Regulations, 2009, or, Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022;

(ii) Please note that the Sharing Regulations, 2020 is effective, whereas the connectivity GNA Regulations, 2022 is not in force or effective, as yet.

(iii) Sub-clause (j) of the principal regulation is regarding DIC. Therefore, it may be substituted as under:

(j) 'Drawee DIC' shall mean the DICs which draw power through ISTS but does not include ESS".

2. (9). Amendment to Regulation 10 of the Principal Regulations:

" I_r " denotes sum of injection into the ISTS at regional nodes"

Comment:

In the existing regulation " I_n " denotes sum of injection into the ISTS at regional nodes".

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Thus, 'I_n' and 'I_r' denotes the same thing. Therefore, the formula may be modified as:
[(I_n - D_r) / I_n] x 100.

3. **(12). Amendment to Regulation 13 of the Principal Regulations:**
Clauses (1) and (2) of Regulation 13 of the Principal Regulations shall be deleted.

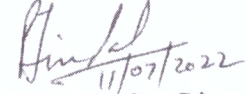
Comment:

Waiver for transmission charges and losses for renewable energy sources are notified by the Ministry of Power from time to time. In absence of relevant regulation implementation of the same may be hampered.

4. **(16). Amendment to Regulation 21 of the Principal Regulations:**
(1) Regulation 21 of the Principal Regulations shall be deleted.

Comment:

It may be included that the consequences of non-payment of dues by a DIC shall be governed as per the Electricity (Late Payment Surcharge and Related Matters) Rules, 2022 as amended from time to time. This would make the regulation complete.



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Secretary, CERC