

VP(SO):973

20<sup>th</sup> September, 2022

**To**  
**The Secretary**  
**Central Electricity Regulatory Commission**  
**3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building**  
**36, Janpath**  
**New Delhi-110001**

Sir,

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

With reference to the public notice (No. L-1/250/2019/CERC) dated 18<sup>th</sup> August 2022, read with the public notice (No. L-1/250/2019/CERC) dated 9<sup>th</sup> July 2022 and public notice (No. L-1/250/2019/CERC) dated 11<sup>th</sup> June 2022, the comments and suggestions on the Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 is attached herewith.

Yours faithfully,



**Vice President (System Operations)**

Encl.

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

| Sl. No. | Clause   | Comment   |
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| 1       | <p>Regulation 5</p> <p><i>“(4) The Yearly Transmission Charges for the National Component shall be shared by all the drawee DICs in proportion to their quantum of GNA.”</i></p>   | <ul style="list-style-type: none"> <li>• If the yearly transmission charge for the national component is shared by all drawee DICs in proportion to their quantum of GNA, it may happen that some DICs have to bear the charges even if they actually don't use the GNA quantum. It is submitted that the transmission charges should be shared based on the use of GNA quantum. Also, the yearly transmission charges for the national component should be applicable for open access consumers also. Notably, GNA is applicable on long and medium term.</li> </ul>                   |
| 2       | <p>Regulation 11</p> <p><i>“(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:</i></p> <p><i>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.)”</i></p> | <ul style="list-style-type: none"> <li>• As per Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022, T-GNA may be applied for any period from 1 (one) time block and up to 11 (eleven) months. In that case T-GNA rate at 10% premium may be reduced. It is too high for the temporary use. Distribution licensees need to purchase power from different sources through T-GNA. If the transmission charge for T-GNA is high, it will finally become a burden on the end-consumers.</li> </ul> |
| 3       | <p>Regulation 12</p> <p><i>“(2) Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for a</i></p>  | <ul style="list-style-type: none"> <li>• In case of transmission deviation in excess of GNA, previously it was 5%, which was reasonable. But 35%</li> </ul>   |

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|   | <p><i>time block during a billing month shall be computed as under:</i></p> <p><i>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)”</i></p> | <p>premium for transmission deviation will be an enormous burden. It is humbly submitted that it should be kept at 5% premium. Moreover, the cost of additional transmission capacity creation is lower in case of excess GNA sought by users. In that case, the transmission deviation should be on lower scale rather than increasing it.</p>   |
| 4 | <p>Proviso under clause (2) of Regulation 10</p> <p><i>“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”.</i></p>                   | <ul style="list-style-type: none"> <li>• For promotion of all type renewable sources, the waiver of transmission losses should be applicable for all types of renewable sources. For non-solar RPO obligation, distribution licensees need to procure other renewable sources apart from wind. It will be helpful if the transmission loss is waived for all types of renewable sources. Otherwise, it will ultimately become a burden on the end-consumers. In this respect it is worthwhile to mention the consumer profile of CESC Limited. In the year 2021-22, about 20.1 lakhs of consumers of CESC accounted for around 926 MU sales – a meagre average sale of around 38 units a month per consumer. About 58% of consumers are in this category and account for even less than 10% of the units sold.</li> </ul> |
| 5 | <p>Regulation 13</p> <p><i>“(3) Clauses (1) and (2) of this Regulation shall be applicable for scheduling of 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 which have declared commercial</i></p>   | <ul style="list-style-type: none"> <li>• For promotion of all type renewable sources, the waiver of transmission charges should be applicable for all types of renewable sources. For non-solar RPO obligation, distribution licensees need to procure other renewable sources apart from wind. It</li> </ul>   |



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|  | <p><i>operation up to 30.6.2025.”</i></p> | <p>will be helpful if the transmission charge is waived for all types of renewable sources. Otherwise, it will ultimately become a burden on the end-consumers. In this respect it is worthwhile to mention the consumer profile of CESC Limited. In the year 2021-22, about 20.1 lakhs of consumers of CESC accounted for around 926 MU sales – a meagre average sale of around 38 units a month per consumer. About 58% of consumers are in this category and account for even less than 10% of the units sold.</p> |
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