



# CAPTIVE POWER PRODUCERS ASSOCIATION

(Registered U/sec. 25 of Company Act 1956 & Certificate of IT 12AA CIN: U91990MH2003GAP141611)

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To,

Date: 3<sup>rd</sup> Oct 2022

The Secretary,  
Central Electricity Regulatory Commission,  
Janpath,  
New Delhi

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

Dear Sir,

Captive Power Producers Association (“CPPA”) is representing the interest of Industries in various States and UTs having captive power plants at their industries in fulfilling the energy requirement of their industries through captively produced power having Captive generation plants.

In response to some of the proposed provisions of the Draft Amendment Regulation, we would like to submit our comments as below:

### Proposed Clause (1) of Regulation 13:

*(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:*

$$GNA_{RE} \text{ (in MW)} = GNA \times \frac{\sum_{n=1}^T \left( \frac{SDR_G}{SDT_G} \right)}{T}$$

Where

- $SDR_G$  is drawl schedule (in MW) through ISTS under GNA from entities covered under sub clauses (i) and (ii) of this Regulation in nth block.
- $SDT_G$  is total drawl schedule (in MW) under GNA through ISTS from all sources in nth block.
- ‘n’ is the nth time block
- T is number of time blocks in a month = 96X number of days in a month

*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<sub>G</sub>” shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.*

### **Our Comments:**

(1) We suggest to add following proviso after first proviso in clause (1) of Regulation 13:

*No transmission charges for the use of ISTS shall be levied for the following GNA quantum ( $GNA_{RE}$ ) for the period of 25 years from date of commissioning of generating station, 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) We suggest to add following proviso after first proviso in clause (2) of Regulation 13:

*No transmission charges for the use of ISTS shall be levied for the following T-GNA quantum ( $T-GNA_{RE}$ ) for the period of 25 years from date of commissioning of generating station, 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*

(3) We suggest to add following proviso after first proviso in clause (1) of Regulation 13:

*Provided further that, in case the GNA is used only 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,  $GNA_{RE}$  shall be equal to GNA.*

(4) We suggest to add following proviso after second proviso in clause (2) of Regulation 13:

*Provided further that, in case the T-GNA is used only 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,  $T-GNA_{RE}$  shall be equal to T-GNA.*

### **Justification for the proposed change:**

(1) The period of 25 years is as per Ministry of Power’s order dated 23<sup>rd</sup> November, 2021 on Waiver of ISTS charges under the provisions of Tariff Policy 2016

(2) As we understand, the formulae is representative of cases where the GNA is utilised by the consumer for transmitting Solar/Wind/Hybrid power as well as conventional power. Accordingly, the total drawl is kept as 75% of GNA.

However, there would be scenarios where GNA is utilized only to bring the Solar/Wind/Hybrid Power. In such cases, the total utilization will be ~25-35%, for the balance time the GNA will not be utilised. Since the consumer is using the GNA only to bring Solar/Wind/Hybrid Power, there shall not be any transmission charges levied for the use of ISTS network. However as per the current formulae, there will be transmission charges levied for balance 65-75% of GNA. Hence, there seems some anomaly in the formulae as it is not representative of all type of cases.

As an example – A consumer who has own conventional captive generating plant within his premises and may bring Solar/Wind/Hybrid Power through ISTS network by direct connecting to CTU. In such case, the consumer will use Solar/Wind/Hybrid power through GNA and will meet balance of its requirement by own captive generation and hence will utilise GNA to the extent of 25-35%.

We request you to consider our comments while finalising the amendment and provide us an opportunity to explain the same during public hearing.

**Thanking you.**

A handwritten signature in blue ink, appearing to read 'J. Hyde'.

**Yours faithfully,  
For Captive Power Producers Association:**