

COMMENTS ON PROPOSED DRAFT CENTRAL ELECTRICITY REGULATORY COMMISSION (SHARING OF INTER-STATE TRANSMISSION CHARGES AND LOSSES) (FIRST AMENDMENT) REGULATIONS, 2022

S No.	Regulation No.	Proposed Amendment	Recommended / New Provision	Justification & Suggestion
1.	13(1)	<p>4. 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 (GN_{ARE}), 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:</p> $GN_{ARE} \text{ (in MW)} = GNA \times \frac{\sum_{n=1}^T \left(\frac{SDR_G}{SDT_G} \right)}{T}$ <p>Where</p> <ul style="list-style-type: none"> • SDR_G is drawl schedule (in MW) through ISTS under GNA from entities covered under subclauses (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 	<p>4. 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 (GN_{ARE}), 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:</p> <p>GN_{ARE} (in MW)= GNA X (Monthly avg ADR_G)/(Monthly avg ADT_G)</p> <p>Where</p> <ul style="list-style-type: none"> • SADR_G is the average of daily maximum actual schedule drawl (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in the nth block • SADT_G is the average of daily maximum actual total actual drawl schedule(in MW) under GNA through ISTS from all sources in nth block of the day. • ‘n’ is the nth time block • T is number of time blocks in a month = 96X number of days in a month 	<p>1. “Renewable Hybrid Generating Station” or “RHGS” is defined in CGNA Regulation 2022 as <i>a generating station based on hybrid of two or more renewable source(s) of energy with or without Energy Storage System, connected at the same inter-connection point</i>”. Whereas, the waiver is allowed to renewable hybrid generating station with a combination of wind and Solar only, and not other renewable sources (PSS, SHP etc).</p> <p>In view of the above, ISTS charge waiver may be extended to RHGS as defined above</p> <p>2. Considering the proposed formula, an open access consumer, having taken GNA and procuring 100% RE power, will not get the full benefit of exemption from transmission charges. May please see the attached excel consider a) 100% procurement of Solar power, b) 100% procurement of Wind power and c) 100% procurement of Hybrid Power. As per the proposed formula, the OA consumer procuring solar power, GN_{ARE} would come to 37.64%. In case of OA consumer procuring wind power, GN_{ARE} would be 78.56% (based on the generation profile) and in case of an OA consumer procuring wind solar hybrid, GN_{ARE}</p>

S No.	Regulation No.	Proposed Amendment	Recommended / New Provision	Justification & Suggestion
		<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>Provided that in case total actual 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>would come to 84.29% of total GNA. Hence, under no scenario of generation from RE, would a 100% RE procuring consumer would be exempted from transmission charges.</p> <p>3. It is hence suggested that linking GNA_{RE} with daily maximum average drawl would be an optimum solution as RE is not available throughout the day. It also suggested that actual drawl to be taken instead of scheduled drawl to improve the accuracy. Further, Proposed GNA for the States under GNA Regulation is derived from day-wise actual peak drawl hence it is requested that a similar methodology may be adopted for the calculation of GNA_{RE} also.</p>
2.	13 (2)	<p>(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:</p> $T-GNA_{RE} \text{ (in MW)} = T-GNA \times \frac{\sum_{n=1}^T \left(\frac{SDRTG}{SDTG} \right)}{T}$ <ul style="list-style-type: none"> • SDRTG is drawl schedule (in MW) through ISTS under T-GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block. 	<p>suggestion mentioned above may be considered here too.</p>	

S No.	Regulation No.	Proposed Amendment	Recommended / New Provision	Justification & Suggestion
		<ul style="list-style-type: none"> • SDTTG is total drawl schedule(in MW) under T-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 or part of the month, as the case may be <p>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 “SDTTG” shall be taken as 75% of maximum schedule corresponding to T-GNA.</p> <p>Provided further that the reimbursement, from the already paid T-GNA charges, on account of T-GNARE shall be made ex-post on finalization of schedules, by 15th day of the next month</p>		