

**JSW's Comments on First Amendment for Draft Central Electricity Regulatory Commission
(Sharing of Inter State Transmission Charges and Losses) Regulations, 2020**

Sr.	Page/Amd.	Draft Regulation	Proposed Draft Regulation	Rationale
1	<u>Page no. 1</u> <u>and</u> <u>Amendment</u> <u>no. 4</u>	<p>Clause (1) of Regulation 13 of the Principal Regulations shall be substituted with the provisions as under:</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</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>Clause (1) of Regulation 13 of the Principal Regulations shall be substituted with the provisions as under:</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</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>Provided that in case of captive consumption, the total drawl schedule (in MW) under GNA through ISTS from all sources (SDTG) shall be taken based on actual schedule with no restrictions in case of less schedule.</p>	<p>In case of consumers having GNA based on captive RE plant located anywhere in India as also having its captive thermal plant located within its manufacturing premises, the formula provided in the draft regulation does not hold good.</p> <p>If such captive consumer has installed a RE generating plant and intends to meet variations of RE power through its own embedded captive thermal plant, as per the proposed formula the RE captive consumer will have to pay transmission charges for part of the RE GNA quantum.</p> <p>Illustration:</p> <p>Suppose captive consumer has GNA of 5000 MW and it has a drawl schedule from identified RE sources in a time-block through ISTS for 2000 MW. Suppose this captive consumer has total drawl schedule from all sources including RE sources through ISTS as 2000 MW and that this is the schedule for all 96 blocks for entire month.</p>

				<p>Since, the captive consumer has total drawl schedule of 2000 MW which is less than $0.75 \times 5000 \text{ MW} = 3750 \text{ MW}$, while calculating GNARE, in denominator, 3750 MW shall be considered.</p> <p>The GNARE shall be calculated as = $5000 \times (2000/3750) = 2666.67 \text{ MW}$.</p> <p>Hence, the captive consumer shall be liable to pay transmission charges for the balance 2333.33 MW RE captive GNA.</p> <p>The above issue can be resolved by adding the suggested provision.</p>
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