

Ref. No: CE/PP/Sharing Reg/Amd-1/

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Date: 20 SEP 2022

To,  
The Secretary,  
Central Electricity Regulatory Commission  
3rd & 4th Floor, Chanderlok Building,  
36, Janpath, New Delhi – 110 001.

**Subject:** MSEDCL Comments on Draft Additional Amendment to Central Electricity Regulatory Commission (Sharing of inter-State transmission charges and losses) (First Amendment) Regulations, 2022.

**Reference:** 1) CERC notice No. L-1/250/2019/CERC dated 18.08.2022.  
2) Supplementary Draft notification Additional amendments to Central Electricity Regulatory Commission (Sharing of inter-State transmission charges and losses Regulations, 2020.

Respected Sir,

Hon'ble CERC has notified additional draft amendment to the draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022

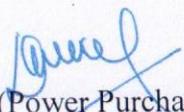
CERC vide notice dated 18.08.2022 has invited comments/suggestions/ objections on the supplementary notification. Accordingly, MSEDCL is hereby submitting the comments and are attached herewith as **Annexure-A**

It is requested that the above MSEDCL comments in the matter may please be taken on record & be placed before Hon'ble Commission for kind consideration please.

Thanking You.

Yours faithfully,

**Encl: Annexure-A**

  
Chief Engineer (Power Purchase),  
MSEDCL

Copy s.w.r.t.  
The Director (Commercial) MSEDCL, Mumbai.

Name of Stakeholder: **MSEDCL**

**Annexure-A**

Sr. No.	Clause No.	Draft Clause	Comments/Suggestion of Stakeholder
1	3 (3)	<p>Clause (3) of Regulation 3 of the Principal Regulations shall be substituted with the provisions as under:                      “GNA<sub>RE</sub> as computed under Clause (1) of Regulation 13 shall not be considered for apportionment of Yearly Transmission Charges under Regulations 5 to 8 of these regulations.”</p>	<p>It is a welcome move that the quantum of inter-state RE shall be excluded from the total GNA quantum of the State for computation of inter-state transmission charges. This would provide the necessary boost to continue the development of RE technology in the Country.</p>
2	13 (1)	<p>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<sub>RE</sub>), 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> $GNA_{RE} \text{ (in MW)} = GNA \times \sum_{n=1}^T \left( \frac{SDR_G}{SDT_G} \right)$ <p>Where                      SDRG is drawl schedule (in MW) through ISTS under GNA from entities covered under sub clauses (i) and (ii) of this Regulation in nth block.</p>	<p>Through the proposed formula, the quantum of GNA<sub>RE</sub> for the month is based on the actual drawal schedule of RE quantum in each time block with respect to the total drawal quantum in each block averaged over 96 time blocks for each day for the month.</p> <p>However, it is submitted that the quantum of GNA<sub>RE</sub> calculated by this formula would always be on the lower side as compared to the total contracted RE by the State, since full RE quantum is not available 24x7. During night hours, the Solar RE quantum would be zero and the quantum of GNA<sub>RE</sub> which is to be calculated by this formula would be significantly reduced to a minimum value (being average of all time blocks for all days of the month) as compared to the total RE quantum contracted capacity by the State.</p> <p><b>It is therefore submitted that the formula shall be</b></p>

		<p>SDTG 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>	<p><b>modified in such a way that the maximum schedule of RE drawal in any particular time block of the month shall be considered as the <math>GNA_{RE}</math> quantum for waiver of transmission charges. The formula is proposed to be revised as below</b></p> <p><b><math>GNA_{RE} = RE_{max}</math></b></p> <p><b>where</b>  <b><math>RE_{max}</math> = Maximum Schedule of RE drawal in any particular time block of the month</b></p> <p>For e.g. State 'A' has an allotted GNA quantum of 8000 MW (including RE). During a particular month, the maximum schedule of RE drawal in a particular time block for State 'A' has gone up to 2000 MW. Then in such case the monthly transmission charges for State 'A' for that month shall be apportioned based on 6000 MW (i.e. 8000 MW-2000 MW) (i.e. Total GNA - <math>GNA_{RE}</math>).</p>
5	13 (1)	<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 n<sup>th</sup> block</p>	<p>As suggested earlier, the formula for <math>GNA_{RE}</math> shall be equated to maximum of RE schedule drawal in particular time block of the month. Hence, there is no further requirement of this clause which states to have a restriction on the total drawal schedule of the State.</p> <p>Hence, it is suggested that the clause on capping the total drawal schedule to 75% of maximum schedule to be deleted from the Draft Regulations.</p>
6	13 (2)	<p>No transmission charges for the use of ISTS shall be levied for the following T-GNA quantum, for scheduling power from (i)</p>	<p>It is submitted that the transmission network/capacity used in T-GNA is part of the capacity allocated to the States under</p>

		<p>REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources:</p> $T-GNA_{RE} \text{ (in MW)} = T-GNA \times \frac{\sum_{n=1}^T \left( \frac{SDRTG}{SDTTG} \right)}{T}$ <p>SDRTG is drawl schedule (in MW) through ISTS under T-GNA from entities covered under sub clauses (i) and (ii) of this Regulation in nth block. 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>	<p>GNA. T-GNA is functional only when any of the State is not using its allocated GNA capacity. Hence, there is no any new additional transmission capacity developed / set up for operationalizing of T-GNA. Therefore, it is proposed that there should not be any waiver in transmission charges for RE quantum under T-GNA as the transmission capacity used in T-GNA is already part of the transmission charges being paid by the States. Hence, it is suggested that the proposed clause to be deleted and no formula for computation of T-GNA<sub>RE</sub> is required to be specified in the Draft Regulations.</p>
7	13 (2)	<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 “SDT” shall be taken as 75% of maximum schedule corresponding to T-GNA.</p>	<p>As suggested earlier, the formula for T-GNA<sub>RE</sub> is proposed to be deleted from the Draft Regulations. Hence, there is no further requirement of this clause which states to have a restriction on the total drawal schedule of the State. Hence, the clause on capping the total drawal schedule to 75% of maximum schedule is also proposed to be deleted from the Draft Regulations.</p>

**Additional comments:**

		<p>Treatment of GNA<sub>RE</sub> in RTDA accounts</p>	<p>There is no clarity how GNA<sub>RE</sub> will be accounted for calculations of the deviation charges in RTDA accounts. It is requested to provide clarity for the same.</p>
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