



एनटीपीसी लिमिटेड

(भारत सरकार का उद्यम)

NTPC Limited

(A Govt. of India Enterprise)

केन्द्रीय कार्यालय/ Corporate Centre

Ref. No. : 01:CC

Date : 19.09.2022

The Secretary
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building,
36, Janpath,
New Delhi-110001

Sub: NTPC Submissions on Supplementary notification to Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022

Sir,

Hon'ble Commission vide its notification dated 18.8.22 has published the Supplementary notification to Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 and has invited views/ comments/ suggestions/ objections from various stakeholders.

In this regard, please find enclosed Submission of NTPC on same.

Thanking you,

(Ajay Dua)
CGM(Commercial)

NTPC's Submission on Supplementary Draft Notification - Additional amendments on Principal Regulation (Sharing of Inter-State Transmission Charges and Losses), 2022.

1. Amendment to Clause (1) of Regulation 13 of the Principal Regulations provides that:

“(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:

Submission: It is respectfully submitted that the MOP order No.-23/12/2016-R&R dated 23.11.2021 provides that:

3.1 For the solar, wind, Hydro PSP and BESS Projects commissioned upto 30.06.2025, the waiver of inter-state transmission charges shall be applicable for the following:

(i) Solar or wind energy generation set up by any person/entity. The power generated from such sources can be self consumed or sold to any entity either through competitive bidding, Power Exchange or through bilateral agreement.

(ii) Electricity from solar and/or wind sources used by Hydro Pumped Storage Plant (PSP) and Battery Energy Storage System (BESS) projects and subject to the following conditions:

(a) at least 51% of the annual electricity requirement for pumping of water in the Hydro Pumped Storage Plant is met by use of electricity generated from solar and/or wind power plants.

(b) at least 51% the annual electricity requirement for charging of the Battery Energy Storage System is met by use of electricity generated from solar and/or wind power plants.

(iii) Electricity generated / supplied from such Hydro PSP and BESS power plants as mentioned in (ii) above.

Accordingly, the proposed clause (1) of Regulation 13 may be changed in line with MoP order as follows:

(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 at least 51% of the annual electricity requirement with REGS or RHGS based on wind or solar sources.

2. Amendment to Clause (1) of Regulation 13 of the Principal Regulations provides that:

(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:

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

Where:

- SDR_G is drawl schedule (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in n th block.

- SDT_G is total drawl schedule (in MW) under GNA through ISTS from all sources in n th block.

- ' n ' is the n th 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 n th 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 th block.

Submission: It is respectfully submitted that in order to promote bundling of cheaper Renewable Energy with costlier Thermal Power and to promote energy transition, MoP Gol vide dt. 12.4.22 has issued revised "Scheme for

Flexibility in Generation and Scheduling of Thermal/ Hydro Power Stations through bundling with Renewable Energy and Storage Power”.

The scheme inter alia provides that Generating Company can establish RE Plant as co-located or at new locations for replacement of costly thermal power and waiver of transmission charges shall be available as follows:

Quote

4. *Transmission Charges*

4.1. *No additional transmission charges shall be levied for bundling of RE power with Thermal/ Hydro power when the RE power plant is co-located within the premises of a Generating Station.*

4.2. *No transmission charges for use of Inter State Transmission System (ISTS) shall be levied when RE power from an RE power plant is being scheduled to the Thermal/Hydro generating stations as a replacement power; for supply to procurers of another Generating Station located at a different location and owned by the same Generating Company.*

Provided that the evacuation of RE power is being made from the same switchyard of the Thermal/ Hydro power plant, up to total transmission capacity.

Unquote

Accordingly, in view of above it is submitted that:

1. The scheme envisages that No transmission charges for use of Inter State Transmission System (ISTS) shall be levied when RE power from an RE power plant is being scheduled to the Thermal/Hydro generating stations as a replacement power.

Hence scheduling of such RE power by Thermal/hydro power generator, operating under flexibility scheme may be allowed *i.e. within the GNA quantum granted to generator such scheduling of RE power for the purpose of replacement shall be permitted.*

2. Further it is respectfully submitted that, for viability of the scheme full waiver of transmission charges on such RE power scheduling is required.

In the present formulation given for waiver of Transmission for GNA_{RE} , it is understood that partially waiver shall be available for the power scheduled from RE power station to the thermal/hydro power station under flexibility scheme.

Illustration:

Suppose Solar project capacity tied up for replacement is 100 MW and accordingly GNA considered for scheduling of such RE power is also considered as 100 MW.

Now if in any block if it is possible to replace 60 MW of thermal energy only, then RE drawl schedule given shall be = 60 MW
Under this condition $GNA_{RE} = 100 \times (60/75) = 80 \text{ MW}$

Therefore, transmission charges for (100-80) 20 MW capacity shall become applicable for that block.

During non-solar hours in any block replacement is Zero hence, Drawl shall also be Zero. Accordingly,

$$GNA_{RE} = 100 \times (0/75) = 0$$

Therefore, full transmission charges shall become applicable for Non-Solar Hours. It may please be noted that above formula is suitable for Discoms wherein non RE power is drawn during non-solar hours under the same GNA quantum hence Transmission charges should be applicable. However, in case of flexibility scheme the thermal generator shall not be scheduling any RE power during non- solar hours hence no transmission charges liability should occur to Thermal generator.

3. It is submitted that, in order to actualize the scheme, the scheduling of RE power to the thermal generating station and the waiver of Transmission charges as envisaged in the above scheme may be incorporated suitably & separately in Sharing of Inter-State Transmission Charges and Losses Regulations, 2022.

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