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(A Government of India Enterprise)



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दिनांक: 03.10.2022

सेवा में,

सचिव

केन्द्रीय विद्युत विनियामक आयोग

तृतीय एवं चतुर्थ तल, चंद्रलोक भवन

36 जनपथ, नई दिल्ली-110001

Sub: CERC (Sharing of Inter State Transmission Charges & Losses) (First Amendment) Regulations, 2022 and Supplementary draft Notification thereof – Comments/Suggestions Reg.

Ref: CERC Public Notice L-1/250/2019/CERC dated 18.08.2022

Sir,

With reference to the CERC (Sharing of Inter State Transmission Charges & Losses) (First Amendment) Regulations, 2022 and Supplementary draft Notification thereof, POSOCO suggestions on the supplementary draft notification are enclosed at **Annexure-I** for kind consideration of the Hon'ble Commission.

सादर धन्यवाद

भवदीय

(एस सी सक्सेना)

मुख्य महाप्रबंधक/ रा. भा. प्रे. के

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Annexure-I

Comments/Suggestions from POSOCO on draft CERC (Sharing of Inter State Transmission Charges & Losses) (First Amendment) Regulations, 2022 and Supplementary Draft Notification thereof

Clause no.	Proposed Draft Regulation	Comments/Suggestion
10(2)	<p>Following proviso shall be added in Clause (2) of Regulation 10 of the Principal Regulations”: “Provided that while preparing drawl schedule of DICs in respect of (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources, whose bidding was completed before 15.1.2021, transmission losses shall be considered as zero”.</p>	<ul style="list-style-type: none"> ▪ The full forms of REGS, RHGS and ESS may be mentioned for more clarity or may be included in definitions. ▪ For ease of administration while granting connectivity, CTU may obtain information of bidding along with the date of implementation as onetime record and same may be shared with Implementing Agency.
13(1)(1)	<p>(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:</p> $GNA_{RE} \text{ (in MW)} = GNA \times \frac{\sum_{n=1}^T \left(\frac{SDR_G}{SDT_G} \right)}{T}$ <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>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>To maintain checks and balances and billing details, it is suggested that Master ledger for GNA and GNA_{RE} may be maintained by CTU. For that, scheduling and related data should be furnished by RLDCs.</p>

<p>13(1)(2)</p>	<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> $T-GNA_{RE} \text{ (in MW)} = T-GNA \times \frac{\sum_{n=1}^T \left(\frac{SDR_{TG}}{SDT_{TG}} \right)}{T}$ <ul style="list-style-type: none"> • SDR_{TG} is draw schedule (in MW) through ISTS under T-GNA from entities covered under sub clauses (i) and (ii) of this Regulation in nth block. • SDT_{TG} is total draw 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 draw 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_{TG}" 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 $T-GNA_{RE}$ shall be made ex-post on finalization of schedules, by 15th day of the next month.</p>	<p>From this clause, it appears that transmission charges paid for $T-GNA_{RE}$ shall be reimbursed ex-post on finalization of the monthly schedules, by 15th day of the next month.</p> <p>Further, at present, transmission charges for transactions under Short Term Open Access are collected by POSOCO and transferred to CTU on monthly basis for final adjustment of STOA charges in the monthly transmission bills.</p> <p>In GNA regulation the transmission charges are payable by the drawee entities only.</p> <p>Accordingly, similar to existing practice, the charges collected by RLDCs/NLDC on account of $T-GNA_{RE}$ may be transferred to CTU for final reimbursement to the states by CTU.</p> <p>Further, the $T-GNA_{RE}$ calculation can only be possible in bilateral transactions where one to one relation can be built. Therefore, in the formulae SDR_{TG} and SDT_{TG} only the bilateral transaction shall be taken for calculation purpose. As, it would not be possible to incorporate Collective transactions including GDAM.</p>
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Other Suggestions:

Implementing Agency is sharing in advance details of monthly transmission charges and basic network for the comments from stakeholders before going forward for the computation of transmission charges. After notification of transmission charges, all the related information is published on POSOCO website in line with the Sharing Regulations 2020. Hence, it is proposed that re-computation of transmission charges may be avoided beyond a certain time limit and a specific clause may kindly be incorporated in the Regulations.

It is also to be noted that Ministry of Power has also issued various orders for Solar and Wind energy based generating stations for exemption of transmission charges and losses. For

implementation of these orders, it is requested that suitable methodology may kindly be incorporated in the Regulations.

In view of the above, it is requested that for clarity and better understanding of stakeholders, this may be suitably clarified in the Regulations/SoR.