



# पावर सिस्टम ऑपरेशन कॉर्पोरेशन लिमिटेड

(भारत सरकार का उद्यम)

POWER SYSTEM OPERATION CORPORATION LIMITED

(A Government of India Enterprise)



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पोसोको/पारेषण मूल्य निर्धारण/

दिनांक: 17.08.2022

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 – Comments/Suggestions Reg.

**Ref:** CERC Public Notice L-1/250/2019/CERC dated 11.06.2022

Sir,

With reference to the CERC (Sharing of Inter State Transmission Charges & Losses) (First Amendment) Regulations, 2022, POSOCO suggestions on the draft Regulations 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

## Annexure-I

### Comments/Suggestions from POSOCO on draft CERC (Sharing of Inter State Transmission Charges & Losses) (First Amendment) Regulations, 2022

| Clause no. | Proposed Draft Regulation   | Comments/Suggestion   |
|------------|---|---|
| 2.1(h)     | 'Drawee DIC' shall mean the DICs which draw power through ISTS but does not include ESS   | The full form of ESS may be mentioned for more clarity.   |
| 2.1(j)     | 'Designated ISTS Customer' or 'DIC' means the user of any transmission element(s) of the Inter-State Transmission System (ISTS) and shall include generating station, State Transmission Utility (STU), distribution licensee including State Electricity Board or its successor company, Electricity Department of State and any other entity directly connected to the ISTS and shall include an intra-State entity or a trading licensee that has obtained <b>Medium Term Open Access or Long Term Access</b> to ISTS; | Since GNA is set to replace LTA/MTOA, the definition of DIC may be modified accordingly to align with CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022 |
| 10.(1)     | Transmission losses for ISTS shall be calculated on all India average basis by the Implementing Agency for each week, from Monday to Sunday, as under:<br><br>$[(In - Dr) / (Ir)] \times 100$<br>Where:<br>'In' denotes sum of injection into the ISTS at regional nodes for the week;<br>'Dr' denotes sum of drawal from the ISTS at regional nodes for the week;<br>'Ir' denotes sum of injection into the ISTS at regional nodes".   | Here, the terms 'In' and 'Ir' have same meaning. So, for ease of understanding, 'Ir' may be replaced by 'In' in the formula itself instead of separately defining both 'Ir' and 'In'.                         |

#### **Other Suggestions:**

As per draft CERC (Sharing of Inter State Transmission Charges & Losses) (First Amendment) Regulations, 2022, clause (1) of Regulation 13 of the Sharing Regulations, 2020 has been deleted. It is to be noted that as per prevailing Regulation 13(1) of the Sharing Regulations, 2020, Solar and Wind energy based generating stations are exempted from transmission charges and losses on fulfilling certain pre-specified conditions. Ministry of Power has also issued various orders for Solar and Wind energy based generating stations for exemption of transmission charges and losses.

Harmonious reading of the GNA Regulations, 2022 and the draft CERC (Sharing of Inter State Transmission Charges & Losses) (First Amendment) Regulations, 2022, brings out that transmission charges are to be borne by “Drawee” entities only. With this philosophy, apparently the waivers granted to RE based generation have been subsumed under the new provisions of GNA Regulations and the draft CERC (Sharing of Inter State Transmission Charges & Losses) (First Amendment) Regulations, 2022.

Further, Ministry of Power vide order no. 23/12/2016/-R&R dated 23.11.2021 and 30.11.2021 has provided the guidelines for waiver of transmission charges for BESS projects commissioned upto 30.06.2025. Relevant part of the order is quoted below:

*“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:*

*..... (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) atleast 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) atleast 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.....”*

It is to be noted that SECI has published “Request for Selection (RfS) Document for setting up of Pilot Projects of 500 MW/1000MWh Standalone Battery Energy Storage Systems in India under Tariff-Based Global Competitive Bidding (ESS-I)” on 13.04.2022 and amendment thereof on 03.06.2022 having reference of above orders.

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.