

Comments/ Suggestions on the Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022:

After scrutinizing the draft amendment regulations, PSPCL (Punjab State Power Corporation Ltd.) wishes to submit following comments/ suggestions:-

1. Clause (1) of Regulation 11 at Sr. No. 10 (2) of amendment

Proposed provision in Clause (1) of Regulation 11 may be revised as under:-

Existing provision in Sharing Regulations, 2020	Proposed provision in first amendment, 2022	Suggested Provision	Rationale/ Remarks
<p>(1) Short Term Open Access Rate (in paise/kWh) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under:</p> <p>Transmission charges of the State for the billing month (in rupees) / (7200 X the quantum, in MW, of Long Term Access plus Medium Term Open Access of the State for the corresponding billing period)</p>	<p>(1) T-GNA Rate (in Rs./MW/block) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under:</p> <p>Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) X 1.10 / (number of days in a month X 96 X GNA quantum, in MW, for all such entities located in the State considered for billing, for the corresponding billing period.)</p>	<p>(1) T-GNA Rate (in Rs./MW/block) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under:</p> <p>Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) / (number of days in a month X 96 X GNA quantum, in MW, for all such entities located in the State considered for billing, for the corresponding billing period.)</p>	<p>The existing provisions may be retained and T-GNA rate should not be calculated @ 110% of Transmission Charges for GNA.</p> <p>As per the existing regulations, no transmission charges for STOA were payable by a distribution licensee which has LTA or MTOA or both. No, as per proposed amendment, distribution licensee has already been burdened for having to pay T-GNA charges in addition to GNA. Atleast the T-GNA rate should not be increased beyond GNA rate.</p>

2. **Clause (6) of Regulation 11 at Sr. No. 10 (6) of amendment**

Proposed provision in Clause (6) of Regulation 11 may be revised as under:-

Existing provision in Sharing Regulations, 2020	Proposed provision in first amendment, 2022	Suggested Provision	Rationale/ Remarks
(6) Transmission charges for Short Term Open Access collected in a billing month, after adjustment as per Clauses (3) and (4) of this Regulation, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.	(6) Transmission charges for T-GNA collected in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.	(6) Transmission charges for T-GNA collected in a billing month, after adjustment as per Clause (3) of this Regulation , shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.	Clause (3) of the Regulation is still in place (not deleted in amendment), according to which <i>“Transmission charges for T-GNA paid by an embedded intra-State entity during a month shall be reimbursed in the following billing month to the State in which such entity is located.”</i>

3. **Clause (2) of Regulation 12 at Sr. No. 11 (2) of amendment**

Proposed provision in Clause (2) of Regulation 12 may be revised as under:-

Existing provision in Sharing Regulations, 2020	Proposed provision in first amendment, 2022	Suggested Provision	Rationale/ Remarks
(2) Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for a time block during a billing month shall be computed as under: 1.05 X (transmission charges of the State for the billing month	(2) Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for a time block during a billing month shall be computed as under: 1.35 X (transmission charges for GNA of entities located in the	(2) Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for a time block during a billing month shall be computed as under: 1.05 X (transmission charges for GNA of entities located in	The existing provision may be retained by charging Transmission Deviation @ 105% of transmission charges. It is worth mentioning that 20%

<p>in Rs.)/ (quantum in MW of Long Term Access plus Medium Term Open Access of the State for the corresponding billing period X 2880)</p>	<p> State, under first bill for the billing month in Rs.)/ (GNA quantum in MW of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)</p>	<p>the State, under first bill for the billing month in Rs.)/ (GNA quantum in MW of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)</p>	<p>transmission deviation/ buffer beyond LTA+ MTOA+ STOA was earlier allowed as per Sharing Regulations 2010, which was discontinued w.e.f. 01.11.2020 after implementation of Sharing Regulations, 2020.</p> <p>Now, the transmission deviation rate should not be abruptly increased from 105% to 135% of transmission charges.</p>
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