Name of Stakeholder: **Rajasthan Urja Vikas Nigam Limited**

Sr. No.	Clause No.	Draft Clause	Suggestion of Stakeholder
1	3 (3)	Clause (3) of Regulation 3 of the Principal Regulations shall be substituted with the provisions as under: "GNA_{RE} 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."	It is a welcome move that the quantum of GNA_{RE} shall be excluded from the total GNA quantum of the State for computation of transmission charges. This would provide the necessary boost to continue the development of RE technology in the Country.
2	13 (1)	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_{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} (in MW)= GNA X $\frac{\sum_{n=1}^{T}\left(\frac{SDRG}{SDTG}\right)}{T}$ 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. SDTG is total drawl schedule (in MW) under GNA	It has been proposed that the quantum of GNA_{RE} for the month is based on the actual drawl schedule of RE quantum in each time block with respect to the total drawl quantum in each block averaged over 96 time blocks for each day of the month. In this regard it is submitted that the quantum of GNA_{RE} calculated by this formula would always be on the lower side as compared to the total contracted RE by the State. RE power is not available 24x7.The quantum of GNA_{RE} calculated using this formula would always be lower than the actual contracted capacity of the RE projects put together. In addition, States have signed PPAs for procurement of RE power considering the waiver of transmission charges for the contracted period (25 years) as notified by by MNRE/MoP, GoI time to time.

		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	GNA_{RE} quantum to be considered for waiver of transmission charges should be the total contracted capacity of the RE projects. Further it is submitted that similar treatment shall be considered for computation of Regional Transmission Deviation Account (RTDA). The contracted quantum of RE by the State shall be subtracted from the actual drawl and then on the balance quantum, the deviation charges shall be made applicable.
5	13 (1), 13 (2)	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	Restricting SDTG at 75% GNA will lead to unnecessary burden of transmission charges on the Distribution Licensee. It is proposed that the clause of capping the total drawl schedule to 75% of maximum schedule shall be deleted from the Regulations.
6	12 (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 state, under first bill for the billing month in Rs) / (GNA quantum in MW considered for billing for the corresponding billing period x number of days in a month x 96)	Earlier these charges were 1.05 times. It is requested to retain the same factor i.e. *1.05 x (transmission charges for GNA of entities located in the state, under first bill for the billing month in Rs) / (GNA quantum in MW considered for billing for the corresponding billing period x number of days in a month x 96)* Proposed deviation charges are very huge and will lead to unnecessary financial burden on the discoms.