

**SOUTHERN REGIONAL POWER COMMITTEE**

**BENGALURU**

**Comments of SRPC Secretariat on Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022:**

Sl.No	Clause/Provisions in the Draft Regulations	Suggested modification	Remarks/comments
1	2. Amendment to Regulation 2 of the Principal Regulations	Sub-clause (j) of Clause 1 of Regulation 2 may be modified as below:  <i>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 <del>Medium Term Open Access or Long Term Access</del> <b>General Network Access to ISTS;</b></i>	As per GNA Regulations
2	“(h) ‘Drawee DIC’ shall mean the DICs which draw power through ISTS but does not include ESS”	A new Sub-clause to be added after Sub-clause (j) of Clause 1 of Regulation 2 as below:  <i>“(j2) ‘Drawee DIC’ shall mean the DICs which draw power through ISTS but does not include ESS”</i>	Sub-clause (h) of Clause 1 of Regulation 2 shall not be substituted as ‘Connectivity Regulations, 2009’ is used in the Sharing Regulations and is at 2(h) of Sharing Regulations
3	2. Amendment to Regulation 2 of the Principal Regulations	A new Sub-clauses to be added as below:	In the draft Regulations, the words <b>GNA &amp; T-GNA are</b> used in the draft Sharing Regulations

		<p><i>“General Network Access” or “GNA” means open access to the ISTS granted under these regulations;</i></p> <p><i>“Temporary GNA” or “T-GNA” means open access to the ISTS granted in terms of Chapter 6 of these regulations;</i></p>	
4	<p>9. Amendment to Regulation 10 of the Principal Regulations:</p> <p>Description of ‘Ir’ under Clause (1) of Regulation 10 of the Principal Regulations shall be substituted as under:  “‘Ir’ denotes sum of injection into the ISTS at regional nodes”</p>		<p>Ministry of Power vide notification dated 06.11.2019 had extended the waiver of inter-State transmission charges and losses on transmission of the electricity generated from solar and wind sources of energy has been extended up to 31.12.2022 and in force.</p> <p>It may be clarified in SOR how the exemption of RE transmission charges and losses as per MoP Order is being complied.</p>
		<p>Formula for transmission loss in Regulation 10 of the Principal Regulations may be modified as below instead of redefining Ir:</p> <p><i>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:</i>  <math display="block">[(In - Dr) / (In)] \times 100</math></p>	<p>Ir can be deleted, since the definition of In &amp; Ir is same.</p> <p>Else Ir may be modified as below:  <i>‘Ir’ denotes sum of injection into the ISTS at regional nodes for the week”.</i></p>
5	<p>11. Amendment to Regulation 12 of the Principal Regulations:</p>	<p><b>This may be modified as below:</b>  (a) For a generating station <b>including REGS</b>, net metered ex-bus injection,</p>	<p>1. As per the prevailing Sharing Regulations, transmission deviation for ISTS connected RE generators are not</p>

	<p>(1)Sub-clauses (a), (b),and (c) of Clause (1) of Regulation 12 of the Principal Regulations shall be substituted as under:</p> <p>“(a) For a generating station, net metered ex-bus injection, in a time block in excess of GNA: .....</p>	<p>in a time block in excess of GNA: ..... <u>The following proviso may be added</u> <b>Provided that NLDC/RLDC shall not allow injection schedule more than the GNA of the Generator.</b> ..... <b>Provided Transmission Deviation for the Generators connected to both STU and ISTS may be computed as below:</b> <b><i>[Net metered Ex-Bus injection X (GNA / Total Ex-Bus Capacity)] - GNA</i></b></p>	<p>computed due to the waiver of the transmission charges as per MoP notification. However, As per the Amendment Regulations, transmission deviation shall be computed for REGS.</p> <p>2. It shall be ensured by Generator that power is not scheduled beyond its GNA and NLDC/RLDC shall not allow scheduling more than the GNA of the Generator.</p> <p>3. For the Generators connected to both STU and ISTS, the methodology of computation of Transmission Deviation may be clearly given;</p> <p>It is proposed that the Transmission Deviation for the Generators connected to both STU and ISTS may be computed as below: <b><i>[Net metered Ex-Bus injection X (GNA / Total Ex-Bus Capacity)] - GNA</i></b></p>
<p><b>6</b></p>	<p>11. Amendment to Regulation 12 of the Principal Regulations:</p> <p>(1)Sub-clauses (a), (b),and (c) of Clause (1) of Regulation 12 of the Principal Regulations shall be substituted as under: ..... (b) For a State net metered injection or <b>net metered drawal</b>, in a time block, in excess of the sum of GNA and T-GNA for the State</p>		<p>1. It is understood that the GNA quantum for the state has been arrived after considering the injection of CGS power into the STU system as the drawal of respective state when CGS is connected to either STU system(Ex. MAPS &amp; Simhadri-I) or connected to both STU system &amp; ISTS (Ex. NNTPS,NLC II St-I, Ramagundam STPS). Hence the transmission deviation, in a time block</p>

	<p>including all drawee intra-state entities.</p>		<p>is the net metered drawal of the state (which includes the drawals through STU system also) in excess of GNA &amp; T-GNA for the State.</p> <p><b>The above may be clearly specified in the SoR as some states may raise issues for reduction of the drawals through STU from Net-Metered Drawal of the state.</b></p> <p><b>Example:</b> NNTPS (1000 MW) is connected to STU (600 MW) &amp; ISTS (400 MW-LTA granted). But Net Metered drawal of Tamil Nadu is computed by adding the injection of NNTPS in STU N/w.</p> <p>Presently, for computing the Transmission Deviation of TN, the net metered drawal of TN is arrived after reduction of Ex-Bus capacity of 600 MW or line flows in STU N/w whichever is lower, since the total LTA of TN does not include the same.</p> <p>But as per GNA Regulations, the GNA quantum arrived for TN factors the quantum of drawal through STU. Hence the net metered drawal shall not be reduced w.e.f implementation of Amendment Regulations.</p> <p>2. In the CERC Sharing Regulations, there is no mention of the LTA of exempted</p>
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7	12.Amendment to Regulation 13 of the		1. As per the NLDC notifications on monthly transmission charges payable by

	<p>Principal Regulations:  .....  “(7) Where Connectivity is granted to a Connectivity grantee on existing margins and COD of such Grantee is delayed, the Connectivity grantee shall, corresponding to the capacity that is delayed, pay transmission charges from the start date of such Connectivity at <b>the rate of Rs. 3000/MW/month</b>:</p>		<p>the States, it is observed to be in the range of Rs.2,50,000-4,50,000/MW/month.</p> <p>2. As per the Principal Regulations, transmission charges are payable at the rate of 10% of transmission charge per MW for the State where such generating station is located:</p> <p>Then transmission charges are payable by connectivity grantee (Generator) are around 25,000-45,000/MW/Month.</p> <p><b>Hence, Rs.3000/MW/month is quite low when compared to Principal Regulations. However, it may be reviewed and may be included in SOR</b></p>
8	<p><b>12. Amendment to Regulation 13 of the Principal Regulations:</b>  <b>(7) Clause (9) of Regulation 13 of the Principal Regulations shall be substituted as under:</b>  “(9) Where a dedicated transmission line has already been constructed or is under construction by an inter-State transmission licensee under coordinated transmission planning of the Central Transmission Utility, the Yearly Transmission Charges for such dedicated transmission line shall be payable by the concerned generating station to the inter-State transmission licensee (including deemed inter-State transmission licensee) from the COD of the dedicated transmission line till COD of such</p>		<p>The amendment may be suitable for the cases after implementation of GNA Regulations. However, for the flowing case of the existing generators transiting c from old Regulations to GNA Regulations, suitable provisions may be incorporated:</p> <p>In Case dedicated transmission line has already been constructed for a generator and LTA was operationalised for part capacity, as per 13(9) of the Principal Regulations, Yearly Transmission Charge for the dedicated transmission line proportionate to the quantum of LTA operationalised shall be considered in accordance with Regulations 5 to 8 of the</p>

	<p>generating station after which Yearly Transmission Charge for the dedicated transmission line shall be considered in accordance with Regulations 5 to 8 of these regulations.”</p>		<p>regulations and the balance transmission charges shall continue to be paid by the generating station as bilateral charges.</p> <p>For such existing generators, as per the amendment Sharing Regulations, GNA is deemed granted for the capacity that LTA was operationalized. <b>For balance capacity upto its connectivity, if the generator does not apply for additional GNA upto its connectivity. It needs to be clarified in SOR that Generator will not be given Injection Schedule beyond deemed GNA and it will be monitored by NLDC/RLDC.</b></p>
<p><b>9</b></p>	<p>12.Amendment to Regulation 13 of the Principal Regulations:</p> <p>“(10) Regional entity Generating stations (a) drawing start-up power or (b)drawing power during shutdown after COD or (c) for REGS drawing power during non-generation hours or <b>(d) injecting infirm power, through ISTS</b>, shall pay transmission charges for injection or drawl beyond its T-GNA , at the rate of Transmission Deviation Rate for the State in which they are located:</p>	<p><b>This may be modified as below:</b></p> <p>“(10) Regional entity Generating stations (a) drawing start-up power or (b)drawing power during shutdown after COD or (c) for REGS drawing power during non-generation hours or <b>(d) injecting infirm power, through ISTS</b>, shall pay transmission charges for injection or drawl beyond its T-GNA , at the rate of Transmission Deviation Rate for the State in which they are located:</p> <p><b>Provided Generating stations injecting infirm power shall pay transmission charges at the rate of Transmission Deviation Rate for the State in which they are located:</b></p>	<p>Under the Regulation 26(Eligibility for Temporary GNA) in GNA Regulations, as per the sub-Regulation 26.1. (Entities eligible as Applicants to apply for T-GNA to ISTS:), T-GNA for Injection of infirm power is not available in the T-GNA eligibility list. Also T-GNA is required only for Buyers for drawing power by Regional entities. Hence the generators cannot avail T-GNA for injection of infirm power as per the GNA Regulations. Else in SOR of GNA Regulations it can be clarified that Infirm Injection will be considered as deemed TGNA with applicable charges.</p>

<p><b>10</b></p>	<p><b>17. Amendment to Regulation 23 of the Principal Regulations:</b>  (1) A new Clause (4) shall be added after Clause (3) of Regulation 23 of the Principal Regulations as under:  “(4) The Implementing Agency shall, within 45 (forty five) days of the notification of this amendment, publish the revised detailed procedures for implementation of the provisions of this amendment after stakeholder consultation.”</p>	<p><b>This may be modified as below:</b></p> <p>“(4) The Implementing Agency and the <b>Central Transmission Utility</b> shall, within 45 (forty five) days of the notification of this amendment, publish the revised detailed procedures for implementation of the provisions of this amendment after stakeholder consultation.”</p>	
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