

**Comments of Statkraft Markets Private Limited on Central Electricity
 Regulatory Commission (Sharing of Inter-State Transmission Charges and
 Losses) (First Amendment) Regulations, 2022**

S.No.	Clause No & Details	Suggestion/Clarification Requested	Rationale for Suggestion
1.	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 Medium Term Open Access or Long Term Access to ISTS;	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, ESS and any other entity directly connected to the ISTS and shall include an intra-State entity or a trading licensee that has obtained GNA and/or T-GNA Medium—Term Open Access or Long Term Access to ISTS;	ESS may be defined as DIC, for bringing in more clarity. Post GNA, long term/medium term open access will no longer be used
2.	Clause 10 (2) (2) Drawal schedule of DICs shall be prepared as per provisions of the Grid Code taking into account the transmission losses of the week preceding the last week as calculated in accordance with	May be modified as below: (2) Drawal schedule of DICs shall be prepared as per provisions of the Grid Code taking into account the transmission losses of the week	As Clause 13 (1) has been deleted in the proposed amendment the Provisio to the current Clause shall also be deleted to avoid any confusion

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	Clause (1) of this Regulation: Provided that while preparing drawal schedule of DICs in respect of projects covered under Clause (1) of Regulation 13, transmission losses shall be considered as zero.	preceding the last week as calculated in accordance with Clause (1) of this Regulation: Provided that while preparing drawal schedule of DICs in respect of projects covered under Clause (1) of Regulation 13, transmission losses shall be considered as zero.	
3.	Clause 11. Transmission charges for T-GNA (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: 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.)”	May be modified as below: (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: 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.)”	Ministry of Power (MoP) in its draft National Electricity Policy (NEP) issued in April-2021, has mentioned to increase the share of short term market to 25% by 2023-2024. Higher charges for T-GNA (as compared to GNA) will be an impediment to encouraging short term transactions. Hence, T-GNA charges shall be made equal to GNA charges
4.	Clause 11 (2)	May be modified as	T-GNA can be applied by

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	(2) Transmission charges for T-GNA shall be payable by drawee embedded entities located in the State, as per the last published T-GNA rate for the State, along with other charges or fees as per GNA Regulations and the Transmission Deviation charges, if any, as per these regulations	below: (2) Transmission charges for T-GNA shall be payable by drawee embedded entities located in the State & other T-GNA grantees as per Regulation 26 (1) of CERC GNA Regulations located in the State , as per the last published T-GNA rate for the State, along with other charges or fees as per GNA Regulations and the Transmission Deviation charges, if any, as per these regulations	and granted to entities other than embedded entities in the State. Hence, the proposed changes
5.	Clause 12 (1) (a) Provided that for a hydro-generating station, schedules for overload capacity of 10% during peak season shall not be charged under transmission deviation. Provided that for a hydro-generating station, schedules for overload capacity of 20% 10% during peak season shall not be charged under transmission deviation.	Due to inherent machine capability (as certified by manufacturer) some of the hydro projects have an overload capacity of 20% (which can be used only during peak season). Such overload capacity shall be allowed to be injected and shall not be treated as transmission deviation
6.	Clause 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:	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	Proposed transmission deviation rate is quite high and the same shall be equal to the present transmission deviation rate

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	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 of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)	as under: 1.35 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 of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)	
7.	Clause 13 (3) (3) Where COD of a Connectivity grantee is delayed from start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity, the Connectivity grantee shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to Connectivity capacity which have not achieved COD: Provided that Yearly Transmission Charges in respect of Associated Transmission System corresponding to the Connectivity capacity which have achieved COD shall be	(3) Where COD of a Connectivity grantee is delayed from start date of Connectivity, except due to Force Majeure events being suffered by Connectivity Grantee (Provided that such Force majeure request has been granted by relevant authorities) & in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity, the Connectivity grantee shall pay Yearly Transmission Charges for the Associated Transmission	Connectivity Grantees shall not be burdened with transmission charges if COD is delayed due to Force Majeure events and such Force Majeure events have been approved by relevant authorities (like MNRE granting COD extension due to COVID-19)

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	included for determination of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations.”	System corresponding to Connectivity capacity which have not achieved COD: Provided that Yearly Transmission Charges in respect of Associated Transmission System corresponding to the Connectivity capacity which have achieved COD shall be included for determination of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations.”	