

Statkraft Markets Private Limited

CIN: U51909DL2011PTC228692 Registered and Corporate office address: 401, 4th Floor, Salcon Rasvilas Building, Saket District Centre, New Delhi-110 017. Office: +91 11 6616 1200

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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	Rationale for Suggestion
		Requested	
1.	2.1 (j)	Designated ISTS	ESS may be defined as
	'Designated ISTS Customer' or	Customer' or 'DIC' means	DIC, for bringing in more
	'DIC' means the user of any	the user of any	clarity.
	transmission element(s) of the	transmission element(s)	Post GNA, long
	Inter-State Transmission	of the Inter-State	term/medium term open
	System (ISTS) and shall include	Transmission System	access will no longer be
	generating station, State	(ISTS) and shall include	used
	Transmission Utility (STU),	generating station, State	
	distribution licensee including	Transmission Utility	
	State Electricity Board or its	(STU), distribution	
	successor company, Electricity	licensee including State	
	Department of State and any	Electricity Board or its	
	other entity directly connected to	successor company,	
	the ISTS and shall include an	Electricity Department of	
	intra-State entity or a trading	State, ESS and any other	
	licensee that has obtained	entity directly connected	
	Medium Term Open Access or	to the ISTS and shall	
	Long Term Access to ISTS;	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;	
2.	Clause 10 (2)	May be modified as	As Clause 13 (1) has been
	(2) Drawal schedule of	below:	deleted in the proposed
	DICs shall be prepared as per	(2) Drawal schedule	amendment the Provisio to
	provisions of the Grid Code	of DICs shall be prepared	the current Clause shall
	taking into account the	as per provisions of the	also be deleted to avoid
	transmission losses of the week	Grid Code taking into	any confusion
	preceding the last week as	account the transmission	
	calculated in accordance with	losses of the week	



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	Clause (1) of this Regulation:	preceding the last week	
	Provided that while preparing	as calculated in	
	drawal schedule of DICs in	accordance with Clause	
	respect of projects covered	(1) of this Regulation:	
	under Clause (1) of	Provided that while	
	Regulation 13, transmission	preparing drawal	
	losses shall be considered as	schedule of DICs in	
	zero.	respect of projects	
		covered under Clause	
		(1) of Regulation 13,	
		transmission losses	
		shall be considered as	
		zero.	
3.	Clause 11. Transmission	May be modified as	Ministry of Power (MoP) in
	charges for T-GNA	below:	its draft National Electricity
	(1) T-GNA Rate (in	(1) T-GNA Rate (in	Policy (NEP) issued in
	Rs./MW/block) shall be	Rs./MW/block) shall be	April-2021, has mentioned
	published for each billing month	published for each billing	to increase the share of
	by the Implementing Agency	month by the	short term market to 25%
	which shall be calculated State-	Implementing Agency	by 2023-2024. Higher
	wise as under:	which shall be calculated	charges for T-GNA (as
	Transmission charges for GNA	State-wise as under:	compared to GNA) will be
	for entities located in the State,	Transmission charges for	an impediment to
	for the billing month, under first	GNA for entities located	encouraging short term
	bill (in rupees) X 1.10 / (number	in the State, for the billing	transactions. Hence, T-
	of days in a month X 96 X GNA	month, under first bill (in	GNA charges shall be
	quantum, in MW, for all such	rupees) X 1.10 / (number	made equal to GNA
	entities located in the State	of days in a month X 96 X	charges
	considered for billing, for the	GNA quantum, in MW, for	
	corresponding billing period.)"	all such entities located in	
		the State considered for	
		billing, for the	
		corresponding billing	
		period.)"	
4.	Clause 11 (2)	May be modified as	T-GNA can be applied by



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



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	1.35 X (transmission charges for	as under:	
	GNA of entities located in the	1.05 1.35 X (transmission	
	State, under first bill for the	charges for GNA of	
	billing month in Rs.)/ (GNA	entities located in the	
	quantum in MW of such entities	State, under first bill for	
	located in the State, considered	the billing month in Rs.)/	
	for billing, for the corresponding	(GNA quantum in MW of	
	billing period X number of days	such entities located in	
	in a month X 96)	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 Grantees
	(3) Where COD of a	Connectivity grantee is	shall not be burdened with
	Connectivity grantee is delayed	delayed from start date of	transmission charges if
	from start date of Connectivity in	Connectivity, except due	COD is delayed due to
	terms of GNA Regulations, and	to Force Majeure events	Force Majeure events and
	the Associated Transmission	being suffered by	such Force Majeure
	System has achieved COD,	Connectivity Grantee	events have been
	which is not earlier than such	(Provided that such	approved by relevant
	start date of Connectivity, the	Force majeure request	authorities (like MNRE
	Connectivity grantee shall pay	has been granted by	granting COD extension
	Yearly Transmission Charges	relevant authorities) &	due to COVID-19)
	for the Associated Transmission	in terms of GNA	
	System corresponding to	Regulations, and the	
	Connectivity capacity which	Associated Transmission	
	have not achieved COD:	System has achieved	
	Provided that Yearly	COD, which is not earlier	
	Transmission Charges in	than such start date of	
	respect of Associated	Connectivity, the	
	Transmission System	Connectivity grantee shall	
	corresponding to the	pay Yearly Transmission	
	Connectivity capacity which	Charges for the	
	have achieved COD shall be	Associated Transmission	



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	included for determination of	System corresponding to	
	transmission charges of DICs in	Connectivity capacity	
	accordance with Regulations 5	which have not achieved	
	to 8 of these regulations."	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."	