

Date: 03.10.2022

To,  
Secretary,  
**Central Electricity Regulatory Commission,**  
3<sup>rd</sup> & 4<sup>th</sup> Chanderlok Building 36, Janpath Rd,  
New Delhi, Delhi 110001

**Subject:** Comments on Draft Central Electricity Regulatory Commission (Sharing of Interstate Transmission Charges and Losses) (First Amendment) Regulations, 2022 and Draft Supplementary Amendment

Dear Sir,

This is with reference to the above subject where Hon'ble **Central Electricity Regulatory Commission (CERC)** has invited comments and suggestions on Draft Central Electricity Regulatory Commission (Sharing of Interstate Transmission Charges and Losses) (First Amendment) Regulations, 2022 and Draft Supplementary Amendment. Our comments on the same has been annexed as Annexure-1.

We request the Hon'ble CERC to take our views on record.

Thanking You  
Yours Sincerely,



Balaji Sivan,  
Director- Policy Advocacy & Regulatory Affairs,  
Sterlite Power, Gurugram, 122008, Haryana

**Annexure-1**

Sl. No.	Clause/ Page No.	Language as per Draft	Suggested modification in language	Rationale/ Remarks
1	4. Clause (1) of Regulation 13	<p>“(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNARE), for scheduling power from</p> <p>(i) REGS or RHGS based on wind or solar sources</p> <p><b>Or</b></p> <p>(ii) ESS charged with REGS or RHGS based on wind or solar sources:</p> $GNA_{RE} \text{ (in MW)} = GNA \times \frac{\sum_{n=1}^T \left( \frac{SDR_G}{SDT_G} \right)}{T}$ <p>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 “SDT<sub>G</sub>” shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p>	<p>“(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNARE), for scheduling power from</p> <p>(i) REGS or RHGS based on wind or solar sources</p> <p>Or</p> <p>(ii) ESS charged with REGS or RHGS based on wind or solar sources:</p> <p><b><u>For self-consumption or sale to any entity either through competitive bidding, power exchange or through bilateral billing.</u></b></p> $GNA_{RE} \text{ (in MW)} = GNA \times \frac{\sum_{n=1}^T \left( \frac{SDR_G}{SDT_G} \right)}{T}$ <p>Provided that in case total drawl schedule (<b>in MWh</b>) under GNA through ISTS from (i) &amp; (ii) above all <del>sources</del>, for <b>a year</b> nth-time block, is less <del>75% of</del> <b>than quantum as defined below:</b></p> <p><b><u>For Solar -25%</u></b></p> <p><b><u>For Wind- 30%</u></b></p> <p><b><u>For Hybrid-35%</u></b></p> <p>of Maximum schedule corresponding to GNA <b><u>calculated in MWh for a year</u></b>, the “SDT<sub>G</sub>” shall be taken as quantum as defined above, as portion of maximum</p>	<p>Request to modify the formula to include complete waiver on quantum of power being imported from solar or wind or hybrid sources or Storage, in line with the Ministry of Power’s order dated 14.06.2017, 13.02.2018, 06.11.2019, 05.08.2020, 15.01.2021, 21.06.2021, 23.11.2021 and 30.11.2021</p> <p>The threshold of 75% is impractical owing to the inform nature of generation from solar, wind and solar wind hybrid project. The threshold needs to be rationalized based on the generation pattern of the solar and wind generation calculated at cumulative basis for a year.</p> <p>Solar and wind generation are infirm in nature, dependent on the weather condition. The generation varies on day-to-day basis and month to month so the calculation of GNA<sub>RE</sub> should be done on cumulative generation in a year</p> <p>This will help in easing the unwanted burden of consumers who are procuring power only from renewable source for meeting their renewable purchase obligation or to reduce their carbon footprints.</p>

Sl. No.	Clause/ Page No.	Language as per Draft	Suggested modification in language	Rationale/ Remarks
2	4. Clause (2) of Regulation 13	<p>“(1) No transmission charges for the use of ISTS shall be levied for the following T-GNA quantum, for scheduling power from</p> <p>(iii) REGS or RHGS based on wind or solar sources</p> <p><b>Or</b></p> <p>(iv) ESS charged with REGS or RHGS based on wind or solar sources:</p> $T-GNA_{RE} \text{ (in MW)} = T-GNA \times \frac{\sum_{n=1}^T \left( \frac{SDR_{TG}}{SDT_{TG}} \right)}{T}$ <p>Provided that in case total drawl schedule (in MW) under T-GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule corresponding to T-GNA, the “SDT<sub>TG</sub>” shall be taken as 75% of maximum schedule corresponding to T-GNA.</p>	<p>schedule corresponding to GNA for <del>the nth</del> block <b>the year</b>.</p> <p>“(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNARE), for scheduling power from</p> <p>(i) REGS or RHGS based on wind or solar sources</p> <p>Or</p> <p>(ii) ESS charged with REGS or RHGS based on wind or solar sources:</p> <p><b><u>For self-consumption or sale to any entity either through competitive bidding, power exchange or through bilateral billing.</u></b></p> $T-GNA_{RE} \text{ (in MW)} = T-GNA \times \frac{\sum_{n=1}^T \left( \frac{SDR_{TG}}{SDT_{TG}} \right)}{T}$ <p>Provided that in case total drawl schedule (<b><u>in MWh</u></b>) under GNA through ISTS from (i) &amp; (ii) above <del>all Sources</del>, for <b>the T-GNA Period</b> nth time block, is less <del>75% of</del> <b><u>than quantum as defined below:</u></b></p> <p><b><u>For Solar -25%</u></b></p> <p><b><u>For Wind- 30%</u></b></p> <p><b><u>For Hybrid-35%</u></b></p> <p>of Maximum schedule corresponding to T-GNA <b><u>calculated in MWh for the period</u></b>, the “SDT<sub>TG</sub>” shall be taken as quantum as</p>	<p>Request to modify the formula to include complete waiver on quantum of power being imported from solar or wind or hybrid sources or Storage, in line with the Ministry of Power’s order dated 14.06.2017, 13.02.2018, 06.11.2019, 05.08.2020, 15.01.2021, 21.06.2021, 23.11.2021 and 30.11.2021</p> <p>The threshold of 75% is impractical owing to the inform nature of generation from solar, wind and solar wind hybrid project. The threshold needs to be rationalized based on the generation pattern of the solar and wind generation calculated at cumulative basis for a year.</p> <p>Solar and wind generation are infirm in nature, dependent on the weather condition. The generation varies on day-to-day basis and month to month so the calculation of GNA<sub>RE</sub> should be done on cumulative generation in a year</p> <p>This will help in easing the unwanted burden of consumers who are procuring power only from renewable source for meeting their renewable purchase obligation or to reduce their carbon footprints.</p>

Sl. No.	Clause/ Page No.	Language as per Draft	Suggested modification in language	Rationale/ Remarks															
			<p>defined above, as portion of maximum schedule corresponding to GNA for the <del>nth</del> block <u>the period</u>.</p> <p><del>Provided that in case total drawl schedule (in MW) under T-GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule corresponding to T-GNA, the "SDT<sub>TG</sub>" shall be taken as 75% of maximum schedule corresponding to T-GNA</del></p>																
3		Request to include the provision for gradual increase in transmission charges commissioned after 30.06.2015, as provided in MOP Order and reiterated as below:	<table border="1"> <thead> <tr> <th>Sl. No</th> <th>Period of Commissioning</th> <th>Inter- State Transmission Charges</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>01.07.2025 to 30.06.2026</td> <td>25% of Applicable Transmission Charges</td> </tr> <tr> <td>2</td> <td>01.07.2026 to 30.06.2027</td> <td>50% of Applicable Transmission Charges</td> </tr> <tr> <td>3</td> <td>01.07.2027 to 30.06.2028</td> <td>75% of Applicable Transmission Charges</td> </tr> <tr> <td>4</td> <td>From 01.07.2028</td> <td>100% of Applicable Transmission Charges</td> </tr> </tbody> </table>	Sl. No	Period of Commissioning	Inter- State Transmission Charges	1	01.07.2025 to 30.06.2026	25% of Applicable Transmission Charges	2	01.07.2026 to 30.06.2027	50% of Applicable Transmission Charges	3	01.07.2027 to 30.06.2028	75% of Applicable Transmission Charges	4	From 01.07.2028	100% of Applicable Transmission Charges	<p>This will assure interest of developers who have a long term investment plan in the country, as these gradual increase in transmission charge will allow ample time for developer to adjust their growth plans without compromising on the pace of growth</p>
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1	01.07.2025 to 30.06.2026	25% of Applicable Transmission Charges																	
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