



TRANSMISSION CORPORATION OF TELANGANA LIMITED
VIDYUT SOUDHA::HYDERABAD - 82
Website:www.tstransco.in CIN No.U40102TG2014SGC094248

From
Chief Engineer/SLDC,
TSTransco, Room No.613,
Vidyut Soudha, Khairatabad,
Hyderabad- 500082.

To
Secretary, CERC.
3 rd & 4 th Floor, Chanderlok Building
36, Janpath, New Delhi- 110001.

Lr.No.CESLDC/SESLDC/DE(DS&S-II) /F.POC/D.No. 56/22, Dt: 11.10.2022

Sir,

Sub: TSTransco -SLDC - Supplementary Draft Notification on Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) (First Amendment) Regulations, 2022 - Submission of comments & Observations - Reg.

Ref: 1) Public Notice No. No. L-1/250/2019/CERC, Dt: 11.06.2022.

2) Lr.No.CESLDC/SESLDC/DE(DS&S-II) /F.POC/D.No. 35 /22, Dt: 08.07.2022

3) Public Notice No. No. L-1/250/2019/CERC, Dt: 18.08.2022.

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With reference to the above, I am directed to submit the views on the proposed Supplementary Draft Notification on Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) (First Amendment) Regulations,2022. Condoning the delay in the submission the views are herewith enclosed for your kind consideration.

Encl: TSTransco Views (4 Pages)

Yours faithfully,


Chief Engineer/SLDC (FAC)

Copy submitted to:

Director (Grid Operations)/TSTransco for favour of kind Information.

Copy to:

Member Secretary/SRPC/29, Race Course Cross Road/Bengaluru-560009

Executive Director/SRLDC/ 29, Race Course Cross Road/Bengaluru-560009

} for favour of
information

TSTRANSCO SLDC-Supplementary Draft Notification on Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) (First Amendment) Regulations, 2022 - Submission of comments & Observations

S.No	Existing Regulations	Proposal as per Draft (First Amendment) Dt: 11.06.2022	Supplementary Draft Notification (First Amendment) Dt: 18.08.2022	Status/Views of SLDC,TSTRANSCO on supplementary Draft Notification (First Amendment)
1	5(4), 6(2) & 6(3) & 893) & 8(5) Yearly Transmission Charges for National Component, Regional Component and AC System Component shall be shared by <i>all drawee DICS and injecting DICS</i> with untied LTA in proportion to their <i>quantum of Long Term Access plus Medium Term Open Access and untied LTA respectively.</i>	The Yearly Transmission Charges for the National Component, Regional Component and AC System Component shall be shared by all the drawee DICS in proportion to their quantum of GNA		With the proposed draft amendment, the entire Yearly Transmission Charges will be levied only on Drawee DICS which may increase Monthly Transmission Charges of Entities/DICs. It is requested to levy transmission charges to Generators to the extent of unscheduled /unused/untied power to share Transmission Charges to Generators along with Drawee DICS.
2	11) Transmission charges Short Term Open Access Rate (in paise/kWh) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under: Transmission charges of the State for the billing month (in rupees) / (7200 X the quantum, in MW, of Long Term Access plus Medium Term Open Access of the State for the corresponding billing period)	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: 1.1 X Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) / (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.)		With proposed Draft amendment, T-GNA price will be higher compared to existing methodology. With this the Power purchase cost of Discoms will increase in turn increase in tariff of end consumer. Hence, the present methodology may be continued for the quantum of T-GNA.
3	12) Transmission Deviation Transmission Deviation, in MW, shall be computed as under: For a State net metered ex-bus injection or net metered drawal, in a time block, in excess of the sum of Long Term Access and Medium Term Open Access. 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: 1.05 X (transmission charges of the State for the billing month in Rs.)/(quantum in MW of Long Term Access plus Medium Term Open Access of the State for the corresponding billing period X 2880)	For a State net metered injection or net metered drawal, in a time block, in excess of the sum of GNA and T-GNA for the State including all drawee intra-state entities. 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 of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)		It is requested to examine the deviation charges in line with MoP rules regarding Transmission Planning Development and Recovery of ISTS Charges Rules 2021, Dt:01-10-2021, Clause of 5(5) with respect to deviation. It is requested to continue existing penal charges of 5% instead of 35% as which will impact Power purchase cost of Discoms in turn increase in tariff of end consumer.

S.No	Existing Regulations	Proposal as per Draft (First Amendment) Dt: 11.06.2022	Supplementary Draft Notification (First Amendment) Dt: 18.08.2022	Status/Views of SLDC,TSTRANSCO on supplementary Draft Notification (First Amendment)
4	<p>13. Treatment of transmission charges and losses in specific cases.</p> <p>13(1) Transmission Charged related to RE Projects</p>	<p>Clauses (1) and (2) of Regulation 13 of the Principal Regulations shall be deleted.</p>	<p>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 (GNARE), 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: Where • SDRG is drawl schedule (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block. • SDTG is total drawl schedule(in MW) under GNA 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 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.</p> $GNA_{RE} \text{ (in MW)} = GNA \times \frac{\sum_{n=1}^T \left(\frac{SDR_G}{SDT_G} \right)}{T}$	<p>It is requested to continue with existing methodology for exemption of full capacity on Round the Clock (RTC) basis for RE(Solar, Wind, Hybrid & ESS) Component, as the network built so far is by considering total LTA capacity of RE. Also, it is requested to ensure that the exemption quantum given to all the entities is same as the quantum which is considered in NC-RE component.</p>

S.No	Existing Regulations	Proposal as per Draft (First Amendment) Dt: 11.06.2022	Supplementary Draft Notification (First Amendment) Dt: 18.08.2022	Status/Views of SLDC,TSTRANSCO on supplementary Draft Notification (First Amendment)
5	<p>13. Treatment of transmission charges and losses in specific cases.</p> <p>13(1) Transmission Charged related to RE Projects</p>	<p>Clauses (1) and (2) of Regulation 13 of the Principal Regulations shall be deleted.</p>	<p>(2) NO transmission charges for the use of ISTS shall be levied for the following T-GNA quantum, 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: SDRTG is drawl schedule (in MW) through ISTS under T-GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block. • SDTTG is total drawl schedule(in MW) under T-GNA 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 or part of the month, as the case may be. Provided that in case total drawl schedule (in MW) under T-GNA through ISTS from all sources for a time-block, is less than 75% of maximum schedule corresponding to T-GNA for the time-block, the "SDTTG" shall be taken as 75% of maximum schedule corresponding to T-GNA. Provided further that the reimbursement, from the already paid T-GNA charges, on account of T-GNARE shall be made ex-post on finalization of schedules, by 15th day of the next month.</p> $T-GNA_{RE} \text{ (in MW)} = T-GNA \times \frac{\sum_{n=1}^T \left(\frac{SDR_{TG}}{SDT_{TG}} \right)}{T}$ <p>(3) Clauses (1) and (2) of this Regulation shall be applicable for scheduling of 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 which have declared commercial operation upto 30.6.2025.</p>	<p>Exemption of full capacity RE in T-GNA may be considered.</p>

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6	13(11) Where a generating station is connected to both ISTS and intra-State transmission system, only ISTS charges and losses shall be applicable on the quantum of Long Term Access and Medium Term Open Access corresponding to capacity connected to ISTS.	Clause (11) of Regulation 13 of the Principal Regulations shall be deleted.		As per the CERC Sharing of ISTS Charges and Losses 2020 Regulations and also as per the MoP's letter on the Policy for connectivity to Generating Stations on Central Public Sector Enterprise with Inter State Transmission System vide Dt: 19-07-2022. Exemption of GNA share whose evacuation is done through State network may be continued.
Additional	As per Clause of 13 (13) , An intra-State transmission system for which tariff is approved by the Commission shall be included for sharing of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations, only for the period for which such tariff has been approved.	Nil		As per the MoP's letter on the Policy for connectivity to Generating Stations on Central Public Sector Enterprise with Inter State Transmission System vide Dt: 19-07-2022 clarifies that when host state has more than 50% share in CPSE Generating stations(ISGS), then connecting intra state transmission line from CPSE Generating Station to the State for drawal of State's Share may form part of ISTS. In view of above,it is reiterated to designate a authority to certify yearly Non-ISTS lines. Clarification & Methodology on certification of Non-ISTS (Intra State transmission system) which carries ISTS as suitable Software is available at respective agencies only.