



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

From
Chief Engineer/SLDC,
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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. 35 /22, Dt: 08.07.2022

Sir,

Sub: TSTRansco - Draft Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) (First Amendment) Regulations, 2022 - Submission of comments & Observations - reg.

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

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With reference to the above, I am directed to submit the views on the proposed draft Amendment on Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) (First Amendment) Regulations. The views are herewith enclosed for your kind consideration.

Encl: TSTRansco Views (5 Pages)

Yours faithfully,


Chief Engineer/SLDC (FAC)

Copy submitted to:

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

Copy to:

Superintending Engineer/Tech. to Chairman & Managing Director/ TSTRansco.

P.S.to Joint Managing Director (Finance, Comml., & HRD)/TSTRansco.

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

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

} for favour of
information

Views of TSTransco on Draft Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) (First Amendment) Regulations:

S.No.	Existing Regulations	Proposal as per Draft (First Amendment)	Views of SLDC
1	<p>Clause of 2 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;</p>	Nil	<p>The words Medium Term Open Access or Long Term Access may be replaced with GNA as per Proposed Draft.</p>

2

5(4), 6(2) & 6(3) & 8(3) & 8(5) Yearly Transmission Charges for National Component, Regional Component and AC System Component shall be shared by *all drawee DICs and injecting DICs* with untied LTA in proportion to their *quantum of Long Term Access plus Medium Term Open Access and untied LTA respectively.*

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.

3

10) Sharing of Transmission Losses
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:

$$\frac{[(In - Dr) / (Ir)] \times 100}{100}$$

Where:

'In' denotes sum of injection into the ISTS at regional nodes for the week;

10) Sharing of Transmission Losses

$$\frac{[(In - Dr) / (Ir)] \times 100}{100}$$

Where:

'In' denotes sum of injection into the ISTS at regional nodes for the week;

'Dr' denotes sum of drawal from the ISTS at regional nodes for the week;

Where:

'Ir' denotes sum of injection into the ISTS at regional nodes".

With the proposed draft amendment, for losses calculation **Ir** and **In** are same.

As per MOP order dt.23.11.2021, the Transmission losses are exempted for the RE Generators whose bidding completed before 01.01.2021.

Under these conditions how the exemptions are worked with modified formula.

<p>'Dr' denotes sum of drawal from the ISTS at regional nodes for the week;</p> <p>'Ir' denotes sum of injection into the ISTS at regional nodes less injection from projects covered under Clause (1) of Regulation 13 of these regulations for the week.</p>		<p>Clarification may please be given.</p>
<p>4</p> <p>11) Transmission charges for Short Term Open Access/T-GNA 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:</p> <p>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)</p>	<p>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:</p> <p>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</p>	<p>With proposed Draft amendment, T-GNA price will be higher compared to existing methodology. With this the Power purchase cost of Discoms will increase inturn increase in tariff of end consumer.</p> <p>Hence, the present methodology i,e without any additional charges may be continued for the quantum of T-GNA.</p>

		billing period.)	
5	<p>12) Transmission Deviation</p> <p>Transmission Deviation, in MW, shall be computed as under:</p> <p>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.</p> <p>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:</p> $1.05 \times (\text{transmission charges of the State for the billing month in Rs.}) / (\text{quantum in MW of Long Term Access plus Medium Term Open Access of the State for the corresponding billing period} \times 2880)$	<p>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.</p> <p>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:</p> $1.35 \times (\text{transmission charges for GNA of entities located in the State, under first bill for the billing month in Rs.}) / (\text{GNA quantum in MW of such entities located in the State, considered for billing, for the corresponding billing period} \times \text{number of days in a month} \times 96)$	<p>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.</p>
6	13. Treatment of transmission charges and	Clauses (1) and (2) of Regulation 13 of the Principal Regulations shall	Clarification needed as requested at Sl.(3)

	losses in specific cases. 13(1) Transmission Charged related to RE Projects	5 be deleted.	
7	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 there was no ISTS network planned for the quantity of drawl of Power from ISGS stations connected to ISTS and State (STU), Hence the exemption clause may be continued. Further, while arriving GNA quantity these drawls also factored. Hence, a methodology may be arrived for exemption of this type of drawl and calculation of GNA in a coordinated manner.
8	(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	It is requested to designate an 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 (RPC & CTU)


Chief Engineer/SLDC (FAC)