

for copy

Tamil Nadu Transmission Corporation Ltd

(Subsidiary of TNEB Ltd)

Er. M. Ramachandran, B.E., M.C.A.,
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144, Anna Salai,
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To
The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building,
36, Janpath,
New Delhi - 110 001.

Lr. No: CE/GO/SE/LD&GO/EE/G/AEE/G/AE2/F. Sharing/D. 268/2022, dt. 18.08.2022

Sir,

Sub: SLDC- Central Electricity Regulatory Commission (Sharing of inter-state Transmission Charges and Losses) (First Amendment) Regulations, 2022 – Draft Notification – Comments submission – Regarding.

Ref: CERC's Public Notice L-1/261/2021-CERC dt 11.06.22

The comments / suggestions /objections on the draft regulations of CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 with respect to SLDC, TANTRANSCO are given below:

1. Clause (1) of Regulation 11 of the Principal Regulations.

T-GNA rate (Transmission charges for quantum purchased under short-term open access) has been increased to 10% of normal transmission charges.

Since the T-GNA is permitted within the Available Transfer capability of existing transmission system, T-GNA rate may be fixed as equal to normal transmission charges for States/Discoms.

2. Clause (2) of Regulation 12 of the Principal Regulations.

The Transmission deviation charges for the beneficiaries has been increased from 5% to 35% of normal transmission charges.

The above 30% is huge raise in the transmission deviation rate for a state. Hence, it is requested that the existing 5% may be retained for the transmission deviation charges.

3. Clause (1) & (2) of Regulation 13 of the Principal Regulations.

The clause 1 & 2 of Regulation 13 of Principal Regulation related to the provision for exemption of transmission charges and losses for the use of ISTS line for availing the power from solar & wind power resources has been removed and stated that the transmission charges shall be settled between buyer and generator.

In the present regulation, the transmission charges for the assets developed for RE projects is recovered through National component – Renewable Energy. In the draft amendment regulation, it has not been mentioned about the methodology of collecting transmission charges for such RE projects and no modification in the National –RE component.

Based on the proposed amendment, the contracted quantum if any with interstate RE generators will be included in the GNA quantum of beneficiary in future which will increase the transmission charges payable by the beneficiary.

Hence, it may kindly be clarified that how the asset developed for RE projects specified in the present regulations will be considered for calculating the transmission charges and apportioned to beneficiaries through National RE component or AC component.

4. Clause (11) of Regulation 13 of the Principal Regulations

The clause related to determining the ISTS and STU capacity when a generator connected to both ISTS and intra-State transmission system has been removed in the draft amendment. Due to removal of this clause the investment made by STU in developing the transmission system for connecting the CGS stations along with the ISTS has not been considered and hence drawee entity has to pay transmission charges for the full share capacity when a CGS is connected to both ISTS and STU lines. This will reflect in the transmission deviation and scheduling loss quantum also.

Hence, it is requested that the clause 13(11) of present regulations may be suitably modified for giving exemption of transmission charges for the power drawn through the state network.

Your kind consideration is very much appreciated.

Yours sincerely,



Managing Director / TANTRANSCO (a/c)

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