

Date: 03.10.2022

To,
Chairperson,
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001.

Ref: Public notice No. L-1/250/2019/CERC dated 11.06.2022

Subject: Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations,2022.

Dear Sir,

This is with reference to the above subject wherein Hon'ble Central Commission by way of the Notice cited under ref above dated 11.06.2022 sought comments on the proposed Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations,2022.

Thus, Vedanta Limited hereby submits comments on draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations,2022. Comments are annexed here and marked as **Annexure-I**

Thanking you.

Yours faithfully,

For Vedanta Limited



(Signing Authority)

Manager, Power Regulatory

Vedanta Limited

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>Or</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_G” 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><u>For self-consumption or sale to any entity either through competitive bidding, power exchange or through bilateral billing.</u></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 MWh) under GNA through ISTS from (i) & (ii) above all Sources, for a year nth time block, is less 75% of <u>than quantum as defined below:</u></p> <p><u>For Solar -25%</u></p> <p><u>For Wind- 30%</u></p> <p><u>For Hybrid-35%</u></p> <p>of Maximum schedule corresponding to GNA <u>calculated in MWh for a year</u>, the “SDT_G” 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 infirm 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_{RE} 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>Or</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_{TG}” shall be taken as 75% of maximum schedule corresponding to T-GNA.</p>	<p>defined above, as portion of maximum schedule corresponding to GNA for the nth block the year.</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><u>For self-consumption or sale to any entity either through competitive bidding, power exchange or through bilateral billing.</u></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 MWh) under GNA through ISTS from (i) & (ii) above all sources, for the T-GNA Period nth time block, is less 75% of than quantum as defined below:</p> <p><u>For Solar -25%</u></p> <p><u>For Wind- 30%</u></p> <p><u>For Hybrid-35%</u></p> <p>of Maximum schedule corresponding to T-GNA <u>calculated in MWh for the period,</u></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_{RE} 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>

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			<p>the “SDT_{TG}” shall be taken as quantum as defined above, as portion of maximum schedule corresponding to GNA for the nth block <u>the period</u>.</p> <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_{TG}” shall be taken as 75% of maximum schedule corresponding to T-GNA</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> <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>	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
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