



BSES Yamuna Power Limited

Shakti Kiran Building, Karkardooma,
Delhi - 110032, India
CIN : U40109DL2001PLC111525
Tel. : +91 11 4124 7111
Fax : +91 11 4124 9765
www.bsesdelhi.com

Ref No: RA/BYPL/2023-24/95

Date: 12.07.2023

To,

The Secretary,
Central Electricity Regulatory Commission,
Third Floor, Chanderlok Building,
36, Janpath, New Delhi-110001

Sub: Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Third Amendment) Regulations, 2023.

Ref: Hon'ble CERC's Public Notice No. L-1/250/2019/CERC dated 12.06.2023.

Sir,

We write in reference to the aforesaid Public Notice, wherein comments have been sought from the stakeholders.

Accordingly, BYPL comments on the same are enclosed as Annexure-A for kind consideration of the Hon'ble Commission.

Thanking You,

Yours faithfully

For BSES Yamuna Power Limited

Sameer Singh
(Authorized Signatory)

Encl: As above

BYPL Comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Third Amendment) Regulations, 2023.

Regulation No.	Draft CERC (Sharing of Inter-State Transmission Charges and Losses (Third Amendment) Regulations, 2023	BYPL comments
Regulation 5 Clause 3 (d)	<p>Addition in 5(3)(d):</p> <p><i>"Provided that % of Yearly Transmission Charges shall be 30% or more in accordance with sub-clause (a) of clause (1) of Regulation 6 of these regulations."</i></p>	<p>HVDC lines were planned/ constructed based on commitment from generators/ States for enabling evacuation of contracted power from one region to the targeted region.</p>
Regulation 6 Clause 1 (a)	<p>Addition in 6(1)(a):</p> <p><i>"Provided that where an interregional HVDC transmission system planned to supply power to a particular region is operated to carry power in reverse direction due to system requirements, the percentage Yearly Transmission Charges of such transmission system to be considered in the regional component and the National component shall be calculated as follows:</i></p> $HVDC_r \text{ (in \%)} = \frac{\sum_{k=1}^n \text{Maximum power flow in reverse direction (in MW) in any time block on kth day} \times 100}{\text{Capacity of HVDC transmission system in forward direction (MW) X number of days in a month}}$ <p>Where k, is a day of a month with total 'n' days</p>	<p>The usage of Lines for reverse direction is mainly attributed to demand of that region .</p> <p>Therefore, sharing of such HVDC elements in reverse direction should not be under National Component. rather it should be under Regional component.</p>

	<p>where HVDCr >30%, the Yearly Transmission charges corresponding to HVDCr shall be considered in the National component and the balance in the regional component.</p> <p>where HVDCr is \leq 30%, 30% of Yearly Transmission Charges shall be considered in the National component and 70% in the Regional component.”</p>	
--	---	--