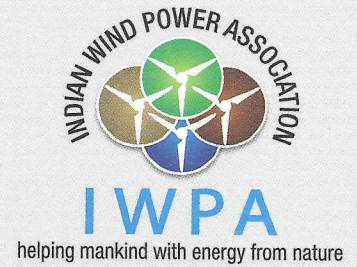


July 11, 2023

IWPA/CERC/2023-24/014

To

The Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building, 36, Janpath
New Delhi - 110001
Email: secy@cercind.gov.in, shilpa@cercind.gov.in



Dear Sir,

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

1. The IWPA welcome the draft Amendment which has proposed to increase the “National component” of Sharing of Inter-State Transmission Charges and Losses for the HVDC lines based on reverse power flow. Para 1.11 of the Explanatory Memorandum to the draft depicts the following power flow in the Raigarh-Pugalur HVDC bi-pole line for the period from April 2022 to April 2023.

Month	Quantum of Power Flow in Fwd. direction (WR to SR) in MW		No. of days/ hours of power flow in fwd. direction	Quantum of Power Flow in rev. direction (SR to WR) in MW		No. of days/ hours of power flow in rev. direction
	Max.	Min.		Max.	Min.	
Apr-22	5628	143	29.58 days	999	307	10 hours
May-22	3287	127	11 days	3006	157	20 days
Jun-22	2408	424	6 days	3005	201	24 days
Jul-22	2880	141	9 days	3001	148	22 days
Aug-22	3001	149	9 days	3002	61	22 days
Sept-22	3509	149	14 days	2883	144	16 days
Oct-22	2001	149	26 days	2402	279	5 days
Nov-22	4500	301	30 days	Nil	Nil	Nil
Dec-22	4414	149	19 days	2878	138	12 days
Jan-23	5505	149	26 days	2401	142	05 days
Feb-23	5008	150	27.8 days	577	281	04 hours
Mar-23	6137	151	30.40 days	1444	138	14 hours
Apr-23	6600	600	30 days	Nil	Nil	Nil

Indian Wind Power Association

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It shows that there is more than 50% (capacity of the line) reverse power flow for more than 88 days in a year in the said HVDC line. Transmission lines are designed for the maximum capacity and they are not designed taking into account the loads in different days of the year or for the average load. Hence, in as much as there is a reverse power flow in a HVDC line, the “maximum capacity of reverse power flow” has to be considered as the sharing criteria for “National component or Regional Component”.

2. For example, in this specific case of **Raigarh-Pugalur HVDC line**, the reverse power flow exceeds 50% of the line capacity. Further, the line should have safety margin for the growing RE power in the South India, especially the proposed offshore wind power etc. Apart from taking care of 50% of reverse power flow, such HVDC lines also provides more flexibility and stability to the overall Grid. Hence, once a HVDC line exceeds 50% of reverse power flow there is a strong case to account the entire charges and losses of the line into the National component. If at all the proposed formula has to be retained, it can be retained till such time the reverse power flow is less than 50 % of the line capacity.

3. In light of the above facts, the following exceptional proviso may be inserted to the draft Regulations.

“Provided that once the reverse power flow of a HVDC line exceeds 50% of its capacity, the entire Inter-State Transmission Charges and Losses shall be accounted into the “National component” of the ISTS”.

We request that the proposed amendment may be modified accordingly.

Thanking you,

Yours sincerely,
For Indian Wind Power Association



Ajay Devaraj
Secretary General

Indian Wind Power Association

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