



KERALA STATE ELECTRICITY BOARD LIMITED

Incorporated under the Companies Act, 1956

Corporate identity Number: U40100KL201 ISGC0272424

Regd Office: VidyuthiBhavanam, Pattom, Thiruvananthapuram – 695004

Office of the Deputy Chief Engineer, Tariff and Regulatory Affairs Cell

IX Floor, Phone (O) +91 471 2514617, 2514317, 2514650

E-mail: trac@kseb.in, web: www.kseb.in

KSEB/TRAC/CG/Draft Regulations/CERC Regulations/2023-24/236

12 -7-2023

To
The Bench Officer,
Central Electricity Regulatory Commission,
Chanderlok Building, Janpath Marg,
New Delhi.

Sir,

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

Ref: Notification No. No. L-1/250/2019/CERC Dated: 12.06.2023 of CERC.

Kind attention of the Hon'ble Commission is invited to the draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Third Amendment) Regulations, 2023. KSEBL comments on the same are submitted below for kind consideration. It is requested that the comments may kindly be considered while issuing final regulation.

**Sub-clause (a) of Clause (1) of Regulation 6 of the Principal Regulations: :
Sharing of transmission charges of HVDC lines:**

As per the draft amendment to Regulation 6 of the CERC (Sharing of Inter-State Transmission Charges and Losses) (Third Amendment) Regulations, 2023, transmission charges for 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 is related to the percentage of power flow in the reverse direction.

The proposed amendment is made to deal with the sharing of Raigarh-Pugalur-Thrissur HVDC system. Whereas in the case of other similar HVDC systems , Hon'ble

Commission has taken a different stand and has declared them 'National Asset' with sharing of 100% transmission charges on all India basis.

It is submitted that the proposal of the Raigarh Pugalur Thrissur HVDC System was conceptualized for the first time in the 35th meeting of Standing Committee meeting of Western Region held on 03.01.2013. It is to be noted that originally (prior to the 35th Meeting), this System was planned as +- 600 kV 4000 MW, Raigarh (Kotra) – Dhule HVDC line, as the transmission system associated with evacuation of power from new Independent Power Producer ("IPP") projects in Chhattisgarh. It is submitted that the Chhattisgarh IPP's had not indicated any firm beneficiaries for power generated from their plants. Considering the power shortage that existed in Southern Region at that time, it was proposed in the said meeting to shift the converter station at Dhule in Western Region to any suitable location in Southern Region. **Thus, the project for +- 600 kV, 4000 MW HVDC Bipole between Raigarh pooling station (near Kotra) to a suitable location in Southern Region was conceptualized - as the transmission system associated with new IPPs in Chhattisgarh.**

Thereafter, the proposal was subsequently modified in the 37th Standing Committee meeting held on 31.07.2014 as Raigarh (HVDC Stn) – Pugalur (HVDC Stn) 6000MW HVDC bipole, which was further extended to Thrissur as 2000MW. Subsequently, considering the Right of Way ("RoW") problems in Kerala and dispersal of power beyond Pugalur, establishment of VSC (Voltage Source Converter) based 2000 MW HVDC link between Pugalur and North Thrissur was proposed - which was approved in the Joint meeting of the Standing Committee on Power System Planning of Southern Region and Western Region held on 20.04.2015.

It is respectfully submitted that, generally, the transmission lines are planned and constructed based on the Long-Term Access applications submitted by the beneficiaries. However, the RPT HVDC system was not planned on the basis of the LTA Applications, rather it was planned in anticipation of setting up of huge capacity of generating stations in the State of Chhattisgarh and in anticipation of increased demands in the southern region of the country, i.e. as a system strengthening scheme.

In the meanwhile, the Government of India came out with various policies for promotion of Renewable Energy ("RE") generation and laid down norms for RE purchase obligations on the State Utilities with the target of 175 GW by the year 2022. With the evolving policies, there has been a huge increase in setting up of Renewable Energy Generating Systems in the southern regions.

Resultantly, in view of the substantial addition of RE generation capacity in the southern region, there is a surplus of RE power in the southern region. The RPT HVDC

system, while originally planned for transmission of power from Chhattisgarh to the southern region – however, by the time it stood operationalized, it has been found to actually be utilized also for transmission of RE power from the southern region to the National Grid for further transmission to the other regions of the country.

In other words, the beneficiaries of this system are all the States and regions, and not just the southern region. It squarely falls within the concept of "National Component".

Therefore, it is requested that instead of monitoring the reverse flow of power and determining the percentage sharing of transmission charges, the entire transmission charges of Raigarh-Pugalur-Thrissur HVDC system may be shared under 'National Component'.

Yours faithfully,



Chief Engineer (Commercial & Tariff)

3/11
12/12