Ref. No: CE/PP/Sharing Reg/3rd Amend/20792          Date: 11/07/2023

To,
The Secretary,
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110 001.

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

**Reference:** 1) Draft Central Electricity Regulatory Commission (Sharing of Inter- State Transmission Charges and Losses) (Third Amendment) Regulations, 2023.
2) Public notice dated 12.06.2023

Respected Sir,

Hon'ble Central Electricity Regulatory Commission has notified Draft Central Electricity Regulatory Commission (Sharing of Inter- State Transmission Charges and Losses) (Third Amendment) Regulations, 2023.

CERC vide notice dated 12.06.2023 has invited comments, suggestions and /or objections on Draft Central Electricity Regulatory Commission (Sharing of Inter- State Transmission Charges and Losses) (Third Amendment) Regulations, 2023. Accordingly, MSEDCL is hereby submitting the comments and are attached herewith as **Annexure-A**

It is requested that the above MSEDCL comments in the matter, may please be taken on record & be placed before Hon'ble Commission for kind consideration please.

Thanking You.

Yours faithfully,

Chief Engineer (Power Purchase),
MSEDCL

Copy s.w.r.t.
Director (Commercial) MSEDCL.

**MSEDCL Comments on Draft Central Electricity Regulatory (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2020 (Third Amendment) Regulations, 2023**

| Clause/ Ref. Page | Existing Clause in Regulation | Clause proposed in Second Amendment | MSEDCL Comments |
|---|---|---|---|
| 6 (1) (a) | (1) Regional Component shall be sum of the following components:<br><br>(a) Regional Component of HVDC (RC-HVDC) comprising of 70% of Yearly Transmission Charges of HVDC transmission systems planned to supply power to the concerned region, except HVDC transmission systems covered under sub clauses (a),(b) and (c) of Clause (3) of Regulation 5; | Following provision shall be inserted in sub-clause (a) of Clause (1) of Regulation 6 of the Principal Regulations<br><br>"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:<br><br>$$\text{HVDCr (in \%)} = \sum_{k=1}^{n}$$<br><br> (Maximum  power flow in reverse direction (in MW) in any time block on kth day x 100)/( Capacity of HVDC transmission system  in forward direction (MW) X number of days in a month)<br><br><br>Where k, is a day of a month with total 'n' days<br><br>where   HVDCr  >30%,   the   Yearly   Transmission | It is submitted that when power flows in reverse direction instead of considering the Maximum Power Flow in reverse direction in any time block, Average Power flow in reverse direction for the day should be considered.<br>As per the Explanatory Memorandum of Draft third Amendment, from power flow pattern on the Raigarh-Pugalur HVDC line, it is observed that there are only few hours of the day wherein power flows in reverse direction with higher quantum. For remaining time blocks, quantum of power flow in reverse direction seems to be very less. Therefore, it would be not be justifiable to apply the proposed formula in such a scenario when considerable Power flows only in few time blocks of any day. This would unnecessary result in higher quantum of 'National Component' of the transmission charges thereby increasing the burden on DICs of other region. Therefore, Average Power flow for the day should be considered in the given formulae. |

| | | charges corresponding to HVDCr shall be considered in the National component and the balance in the regional component.<br><br>where HVDCr is < 30%, 30% of Yearly Transmission Charges shall be considered in<br>the National component and 70% in the Regional component." | MSEDCL proposes the formula of HVDC regional component (HVDCr) as below;<br><br>HVDCr (in %) =<br><br>$\sum\limits_{k=1}^{n}$<br><br>(Average power flow in reverse direction (in MW) on kth day x 100) / ( Capacity of HVDC transmission system in forward direction (MW) X number of days in a month) |