



APPCC/APDISCOMs.

Presentation to the Hon'ble CERC:

On Proposed Third Amendment to CERC-Sharing of Inter State
Transmission Charges - Regulations.

Proposed Amendment

Following provision shall be inserted in sub-clause (a) of Clause (1) of Regulation 6 of the Principal Regulations:

- “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:

HVDCr (in %) =

$$\frac{\sum_{k=1}^n \text{Maximum power flow in reverse direction (in MW) in any time block on kth day} \times 100}{\text{Capacity of HVDC transmission system in forward direction (MW)} \times \text{number of days in a month}}$$

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Where k, is a day of a month with total 'n' days

where HVDCr >30%, the Yearly Transmission charges corresponding to HVDCr shall be considered in the National component and the balance in the regional component.

where HVDCr is \leq 30%, 30% of Yearly Transmission Charges shall be considered in the National component and 70% in the Regional component.”

Views of APPCC/APDISCOMs. Contd..

- Illustrative example in the explanatory Memorandum is referring to Raigarh-Pugulur HVDC Line.
- As confirmed Raigarh-Pugulur HVDC system is capable of operating in reverse direction.
- Quantity of flow in the reverse direction (3000 MW) is limited by the downstream network condition but not by any technical constraint in basic capacity of HVDC System & Line (6000MW).
- The proposed formula is a function of time block wise reverse flow and quantum of capacity in forward direction. $\text{Sigma of time block wise reverse flow} \div \text{forward capacity} \times \text{time duration}$

Views of APPCC/APDISCOMs. Contd...

- This HVDC r (%) factor in Raigarh-Pugulur case will never reach more than 50% since even in the case where reverse flow is continuous at peak capacity of 3000 MW (since restricted by downstream network), the max forward flow is 6000 MW.
- This condition is not tested for other Inter regional HVDC Transmission Systems, already placed in National Component.
- Even the HVDC Back to Back Stations which are presently covered in National Component are in the normal course/ major duration of the time in a year except in some seasons, operate in Uni-direction.
- Southern States are shouldering the responsibility of fulfillment of INDC Goals of Govt. of India, in Wind Sector.
- This Line is useful to export RE energy during Wind season to rest of India from SR.

Views of APPCC/APDISCOMs. Contd...

- Further, it is to submit that SR beneficiaries are battling legally for consideration of this Line as National Component.
- Hon'ble APTEL in their Order on IA No. 1985 of 2022 in th July 2023 Appeal No. 433 of 2022 Dt.

We, therefore, find it appropriate to set aside the Impugned Order and direct the Central Commission to pass fresh order in the light of the observations recorded in the foregoing paragraphs and also duly consulting the statutory authorities i.e. CEA, CTU and POSOCO in the matter and also considering the aforementioned MoP's letter dated 30.05.2022.
- Hon'ble Commission is prayed to consider this Raigarh-Pugulur line also into National Component and all HVDC Interregional Systems except those meant for Power Evacuation in the National Component.

Thank You for the Opportunity