



BSES Rajdhani Power Limited

BSES Bhawan, Nehru Place,
New Delhi - 110 019, India.
CIN : U40109DL2001PLC111527
GST : 07AAGCS3187H2Z3
Tel. : +91 11 4920 9999
Fax : +91 11 4920 7888
www.bsedelhi.com

Ref No: HOD (PMG)/BRPL/2024-25/465

Date: 26.11.2024

To,
The Secretary,
Central Electricity Regulatory Commission,
World Trade Centre, 6th, 7th and 8th Floor,
Tower-B, Nauroji Nagar,
New Delhi-110029

Sub: Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.

Ref: Hon'ble CERC's Public Notice No. L-1/250/2019/CERC dated 11.11.2024.

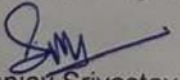
Respected Sir,

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

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

Thanking You,

Yours faithfully
For BSES Rajdhani Power Limited


Sanjay Srivastav
Head (PMG)

Encl: As above

ANNEXURE-A

BRPL Comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.

Regulation No.	Clause	BRPL comments
<p>3. Amendment to Regulation 12 of the Principal Regulations: (1) A new Proviso shall be added after the third Proviso of sub-clause (a) of Clause (1) of Regulation 12 of the Principal Regulations as under:</p>	<p>“Provided also that for a Generating Station having dual connectivity to both inter-State transmission system and intra-State transmission system, the transmission deviation shall be computed as net metered ex-bus injection, in a time block in excess of (GNA to the inter-State transmission system + Connectivity with STU system)”</p>	<p>Said proposed provision is introduced to compute to Transmission Deviation for Generating Station having dual connectivity to both inter-State transmission system and intra-State transmission system.</p> <p>It is submitted that said state shall be scheduling such generator having dual connectivity as per its requirement.</p> <p>Further the generator shall receive the schedule from RLDC or its inter-state beneficiaries as per their requirement within the limit of their respective allocated capacity and the total of such inter-state schedules shall be within the limit of generators ISTS GNA.</p> <p>Now if, the Deviation of Generator is allowed in excess of (GNA to the inter-State transmission system + Connectivity with STU system) and Dual Connectivity State gives schedule to Generator as per its requirement below its connectivity, the generator shall be free to inject more power into the ISTS system over and above its ISTS GNA without any liability of Deviation charges.</p> <p>Therefore the proposed Proviso should be modified as below; “Provided also that for a Generating Station having dual connectivity to both inter-State transmission system and intra-State transmission system, the transmission deviation shall be computed as net metered ex-bus injection, in a time block in excess of (GNA to the inter-State transmission system + Schedule Generation from STU system)”</p>
<p>Regulation 4 (3)</p>	<p>(a-i) Hydro PSP ESS, which has awarded the contract on</p>	<p>1. Current Scenario and Challenges:</p>

<p>New sub-clauses (a-i) and (a-ii) shall be inserted after sub-clause (a) in Clause (2) of Regulation 13 of the Principal Regulations:</p>	<p>or before 30.6.2025, shall be eligible for a waiver of transmission charges for a period of 25 years from the COD, subject to conditions as per sub-clause (c) of this Clause.</p>	<p>PSP projects currently in the early stages of development have faced delays due to extraordinary circumstances, such as prolonged clearance processes and other unavoidable challenges. Many of these projects could not enter into contract agreements within the stipulated timeline.</p> <p>To support such delayed projects and encourage their development, PSP Hydro projects should be eligible for a 100% waiver of transmission charges even after 30.06.2025, for a period of another 2 years. This extension will provide much-needed relief and promote investments in such projects.</p> <p>2. Proposed Clause Amendment:</p> <p>"Hydro PSP ESS, which has awarded the contract on or before 30.06.2025, shall be eligible for waiver of transmission charges for a period of 25 years from the COD, subject to the conditions laid out in Clause (c) of this provision."</p> <ul style="list-style-type: none"> • Additionally, a special provision should be introduced to extend the eligibility for transmission charge waivers by two additional years for projects unable to finalize contracts due to unforeseen delays.
	<p>(a-ii) REGS based on Offshore wind which has declared commercial operation on or before 31.12.2032 shall be eligible for a waiver of transmission charges for a period of 25 years, from the</p>	<p>ISTS waiver has been critical for expansion of renewable energy capacity as it reduces the cost of delivered power, translating into lower tariffs for the end consumer</p>

	COD of said REGS.	