



सेंट्रल ट्रांसमिशन यूटिलिटी ऑफ इंडिया लिमिटेड

(पावर ग्रिड कॉर्पोरेशन ऑफ इंडिया लिमिटेड के स्वामित्व में)

(भारत सरकार का उद्यम)

CENTRAL TRANSMISSION UTILITY OF INDIA LTD.
(A wholly owned subsidiary of Power Grid Corporation of India Limited)
(A Government of India Enterprise)

Ref: CTUIL/SR2020/4th Amend/Comments

Date: 25.11.2024

To,
Secretary
Central Electricity Regulatory Commission (CERC)
3rd & 4th Floor, Chanderlok Bhawan,
36, Janpath, New Delhi - 110001

Subject: Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission System Charges & Losses) (4th Amendment) Regulations, 2024 -Submission of comments reg.

Sir,

This has reference to public notice no. L-1/250/2019/CERC dated 09.10.2024 vide which comments/suggestions from the stakeholders were invited on the subject draft amendments.

In this regard, please find enclosed CTUIL's comments/suggestions on proposed "Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission System Charges & Losses) (4th Amendment) Regulations, 2024" for consideration of Hon'ble commission.

Thanking you,

Yours faithfully,

On behalf of CTUIL

(Kamal Kumar Jain)
Sr. GM (BCD & Regulatory), CTUIL

Encl: CTUIL's comments on subject amendments

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

Hon'ble CERC vide public notice ref: L-1/250/2019/CERC dated 09.10.2024 has issued draft notification of Fourth Amendment to Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, where CERC has proposed amendments to various clauses under Regulation 2, 12 & 13 of the Principal Regulations related to the following:

- Waiver of ISTS Charges for offshore wind power projects, Green Hydrogen/ Green Ammonia Plants, Hydro PSPs, and Hydro Projects,
- Calculation of transmission deviation for generators having dual connectivity to both inter-State and intra-State transmission systems,
- Treatment of mismatch transmission charges towards the terminal bay (s) &
- Calculation of availability for the ISTS, including the projects under tariff based competitive bidding.

1. Among the modifications proposed towards transmission charges of terminal bay under Clause (3) & (7) of Regulation 13, we understand that as terminal bay is not part of ATS as per the definition under the GNA Regulations, and therefore, in case terminal bay is constructed under ISTS by a Transmission Licensee and COD of Connectivity Grantee is delayed then YTC of the terminal bay is to be recovered from the Connectivity Grantee in all applicable scenarios viz., Terminal bay with ATS or without ATS and Terminal bay under existing margins. Comments/ suggestions are provided keeping the above in view.

2. Further, with regard to the new clause (13) as per the proposed amendment regarding **Availability of the Transmission System** the following are observed:

- Under the erstwhile CERC Sharing Regulations, 2010, a separate Transmission Service Agreement was provided and agreements already signed are still applicable. Therefore, to differentiate between the said Transmission Service Agreement with Transmission Service Agreement under TBCB, suitable changes are proposed. It is also to mention that "Transmission Service Agreement" is already referred to at multiple places in the Principal Regulations and everywhere the term **"Transmission Service Agreement under tariff based competitive bidding"** is used. Therefore, in order to maintain uniformity, the change is proposed.
- Further, the changes which are proposed are related to **"Procedure for Calculation of Transmission System Availability Factor for a Month"**. Therefore, for better clarity it is suggested that the term Availability may be replaced with the term **"Transmission System Availability Factor"**



- As Regulation 13 (13) is already there in the Principal Regulations, the Proposed Regulation may be numbered as Regulation 13(14).

In line with above, the detailed Comments of CTUIL in this regard are as follows:

Clause	Existing clause	Amendment proposed in the draft (Shown in Yellow)	Modifications proposed by CTUIL in the draft (Shown in blue)
13 (3)	<p>Where COD of a Connectivity grantee other than Renewable Power Park Developer has not been achieved on or before start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than start date of Connectivity, the Connectivity grantee shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to Connectivity capacity which has not achieved COD:</p> <p>Provided that where a Connectivity grantee is Renewable Power Park Developer and the generation capacity within the Renewable Power Park has not declared COD on or before start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than start date of Connectivity, the Renewable Power Park Developer shall pay Yearly Transmission Charges for the Associated Transmission System</p>	<p>Where COD of a Connectivity grantee other than Renewable Power Park Developer has not been achieved on or before start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than start date of Connectivity, the Connectivity grantee shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to Connectivity capacity which has not achieved COD:</p> <p>Provided that where a Connectivity grantee is Renewable Power Park Developer and the generation capacity within the Renewable Power Park has not declared COD on or before start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than start date of Connectivity, the Renewable Power Park Developer shall pay Yearly Transmission Charges for the Associated Transmission System</p>	<p>Where COD of a Connectivity grantee other than Renewable Power Park Developer has not been achieved on or before start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System <u>and terminal bay constructed under ISTS by Transmission Licensee</u> has achieved COD, which is not earlier than start date of Connectivity, the Connectivity grantee shall pay Yearly Transmission Charges for the Associated Transmission System <u>and terminal bay</u> corresponding to Connectivity capacity which has not achieved COD:</p> <p>Provided that where a Connectivity grantee is Renewable Power Park Developer and the generation capacity within the Renewable Power Park has not declared COD on or before start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System <u>and terminal bay constructed under ISTS by Transmission Licensee</u> has achieved COD, which is not earlier than start date of Connectivity, the Renewable Power Park Developer shall pay Yearly Transmission Charges for the Associated Transmission System</p>

13 (7)	<p>corresponding to generation capacity which has not achieved COD:</p> <p>Provided that Yearly Transmission Charges in respect of Associated Transmission System corresponding to the Connectivity capacity which have achieved COD shall be included for determination of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations.</p>	<p>System corresponding to generation capacity which has not achieved COD:</p> <p>“Provided further that for cases of augmentation without ATS and where the Terminal Bay(s) at the ISTS sub-station, in the scope of the transmission licensee have achieved COD, which is not earlier than the start date of Connectivity, and the COD of a Connectivity grantee or the Renewable Power Park Developer, as the case may be, has not been achieved, the Connectivity Grantee or the Renewable Power Park Developer, as the case may be, shall pay Yearly Transmission Charges for the Terminal Bay(s) corresponding to the Connectivity capacity which has not achieved COD:</p> <p>Provided also that Yearly Transmission Charges in respect of the Associated Transmission System and terminal bay(s) that have achieved COD shall be included for determination of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations.”</p>	<p>Yearly Transmission Charges for the Associated Transmission System and terminal bay corresponding to <u>connectivity quantum</u> for which generation capacity <u>which</u> has not achieved COD:</p> <p>“Provided further that for cases of augmentation without ATS and where the Terminal Bay(s) at the ISTS sub-station, in the scope of the transmission licensee have achieved COD, which is not earlier than the start date of Connectivity, and the COD of a Connectivity grantee or the Renewable Power Park Developer, as the case may be, has not been achieved, the Connectivity Grantee or the Renewable Power Park Developer, as the case may be, shall pay Yearly Transmission Charges for the Terminal Bay(s) corresponding to the Connectivity capacity which has not achieved COD:</p> <p>Provided also that Yearly Transmission Charges in respect of the Associated Transmission System and terminal bay(s) that have achieved COD shall be included for determination of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations.”</p>
	Where Connectivity is granted to a Connectivity grantee other than Renewable	Where Connectivity is granted to a Connectivity grantee other than Renewable	Where Connectivity is granted to a Connectivity grantee other than Renewable

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<p>Power Park Developer, on margins of existing system or on the augmented system with no ATS, and if the COD of such Grantee is delayed beyond start date of connectivity, the Connectivity grantee shall, corresponding to the capacity that is delayed, pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000/MW/month:</p> <p>Provided that where a Connectivity grantee is Renewable Power Park Developer and the generation capacity within the Renewable Power Park has not declared COD on or before start date of Connectivity in terms of GNA Regulations, the Renewable Power Park Developer shall pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000/MW/month corresponding to generation capacity which have not achieved COD:</p> <p>Explanation: Such amount received in a billing month, shall be reimbursed to the drawee DICs in proportion to their share in the first bill in the following billing month.</p>	<p>Power Park Developer, on margins of existing system or on the augmented system with no ATS and where the terminal bay is not constructed under ISTS, and if the COD of such Grantee is delayed beyond start date of connectivity, the Connectivity grantee shall, corresponding to the capacity that is delayed, pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000/MW/month:</p> <p>Provided that where a Connectivity grantee is Renewable Power Park Developer and the generation capacity within the Renewable Power Park has not declared COD on or before start date of Connectivity in terms of GNA Regulations, the Renewable Power Park Developer shall pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000/MW/month corresponding to generation capacity which have not achieved COD:</p> <p>Explanation: Such amount received in a billing month, shall be reimbursed to the drawee DICs in proportion to their share in the first bill in the following billing month.</p>	<p>Power Park Developer, on margins of existing system or on the augmented system with no ATS and where the terminal bay is not constructed under ISTS, and if the COD of such Grantee is delayed beyond start date of connectivity, the Connectivity grantee shall, corresponding to the capacity that is delayed, pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000/MW/month:</p> <p>Provided that where a Connectivity grantee is Renewable Power Park Developer and the generation capacity within the Renewable Power Park has not declared COD on or before start date of Connectivity in terms of GNA Regulations, the Renewable Power Park Developer shall pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000/MW/month corresponding to generation capacity which have not achieved COD:</p> <p><u>Provided that where the terminal bay is constructed under ISTS by Transmission Licensee and achieved COD, which is not earlier than start date of Connectivity, the Connectivity grantee shall also pay the Yearly Transmission Charges of the terminal bay, corresponding to the generation capacity which has not achieved COD.</u></p>
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<p>New clause 13(13)</p>		<p>(13) Availability of the Transmission System: Notwithstanding any provisions to the contrary in the Transmission Service Agreement, the Availability of a transmission system or an element thereof shall be calculated as specified in the Tariff Regulations.</p>	<p>“(13) (14) Availability of the Transmission System Notwithstanding any provisions to the contrary in the Transmission Service Agreement under tariff based competitive bidding, the Availability <u>Transmission System Availability Factor</u> for a month of a transmission system or an element thereof shall be calculated as specified in the <u>applicable Tariff Regulations amended from time to time.</u></p>

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