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Cc: seppmsedcl@gmail.com
Sent: Mon, 25 Nov 2024 18:10:42 +0530 (IST)
Subject: MSEDCL Comments on Draft Central Electricity Regulatory Commission (Sharing of inter-state Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024

Dear Sir/Madam,

Please find herewith comments from MSEDCL on Draft Central Electricity Regulatory Commission (Sharing of inter-state Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.

Thanks and Regards
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Reg.No.	Existing Regulations	Amended Regulations	Comments
12(1)	<p>For a generating station including ESS and captive generating plant, transmission deviation shall be net metered ex-bus injection, in a time block in excess of GNA of such entity:</p> <p>Provided that for a hydro-generating station, schedules for overload capacity as permissible under the Grid Code during peak season shall not be considered for computing the transmission deviation:</p> <p>Provided further that transmission deviation charges shall not be levied for the quantum of over-injection for providing primary response by a generating station, subject to verification of such over-injection by concerned RPC:</p> <p>Provided also that each RPC shall issue necessary guidelines for furnishing the data by the generating stations regarding their primary response</p>	<p>Addition of new clause:</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>Provided that the Generator should have connectivity/GNA as per the capacity of their plant.</p>
13(2)a)	<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>New Clause added:</p> <p>“(a-i) Hydro PSP ESS, which has awarded the contract on 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>(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 COD of said REGS.”</p>	<p>The deadline for award of construction work for Hydro PSP ESS should be extended to 30.06.2026.</p>

13(2)g)	<p>New Clause added</p> <p>13(2)h) added</p>	<p>Any REGS based on wind or solar source which is eligible for a waiver of inter-state transmission charges under Regulation 13(2) of these regulations and is having its scheduled date of commissioning on or before 30th June 2025 is granted extension of time to achieve COD by the competent authority in terms of the Power Purchase Agreements (where PPA has been entered into with, a Renewable Energy Implementing Agency or a distribution licensee or an authorized agency on behalf of distribution licensee, consequent to tariff based competitive bidding) or the Commission (for cases other than specified PPA, on an appropriate application made by the entity), on account of any Force Majeure event including non-availability of transmission or for reasons not attributable to the REGS, and the project achieves COD before the extended date, it shall be eligible for a waiver of inter-state transmission charges as if the said REGS had achieved COD on 30.6.2025: Provided that, for the purpose of this Clause, such extension shall not exceed a period of six months at a time and not more than two times.”</p>	<p>Extensions should be given after prudent checks of delay events, by appropriate Commission.</p>

13(3)	<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 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>“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: Provided also that Yearly Transmission Charges in respect of the Associated Transmission System and terminal bay(s) corresponding to the Connectivity capacity 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>Licensee constructing terminal bay should match the COD of other associated system, to avoid burden on generators/TSUs.</p>
13(12)	<p>New Clause Added</p> <p>13(13) added</p>	<p>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>Outages for multiple works should be coordinated to be minimized.</p>

