



# Punjab State Power Corporation Limited

(Regd. Office: PSEB Head Office, The Mall, Patiala-147001, Punjab, India, Website: [www.pspcl.in](http://www.pspcl.in))  
Corporate Identity Number (CIN): U40109PB2010SGC033813, GSTIN: 03AAFCP5120Q1ZC

Office of the Chief Engineer / PP&R,

D-3 Shed, Shakti Vihar, PSPCL, Patiala- 147001 (Punjab)

Tel No. 0175-2970894, E-mail: [ce-ppr@pspcl.in](mailto:ce-ppr@pspcl.in), [cepprpspcl@gmail.com](mailto:cepprpspcl@gmail.com)

To

Secretary,  
Central Electricity Regulatory Commission (CERC),  
6th, 7th & 8th Floors, Tower B, World Trade Centre,  
Nauroji Nagar, New Delhi- 110029

E-mail: [secy@cercind.gov.in](mailto:secy@cercind.gov.in)  
[mmchaudhari@cercind.gov.in](mailto:mmchaudhari@cercind.gov.in)

Memo no. 1298 /ISB-710

Date: 4/11/24

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

Kindly refer to your Public Notice No. L-1 /250/2019/CERC dated 09.10.2024, vide which comments/suggestions/objections of the stakeholders and interested persons on the subject cited draft regulations were invited.

Accordingly, comments/ suggestions of Punjab State Power Corporation Ltd. (PSPCL) are as under:

*“The aforementioned draft amendment dated 09.10.2024 proposes inclusion of waiver of Inter-State Transmission Charges to facilitate the execution of offshore wind power projects, Green Hydrogen/ Green Ammonia Plants, Hydro PSPs, and Hydro Projects in line with Ministry of Power orders dated 29.05.2023 and 09.06.2023.*

*In this regard, it is submitted that as per the provisions of CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2023, the existing waiver of transmission charges on account of energy scheduled by DICs from REGS/ RHGS based on wind/solar/ ESS and New Hydro Projects is being apportioned among all DICs in proportion to transmission charges of each drawee DIC in line with Clause 1 (f) of Annexure-III for aforementioned First Amendment of Sharing Regulations.*

*With the inclusion of waiver on account of energy scheduled by DICs from offshore wind power projects, Green Hydrogen/ Green Ammonia Plants, such apportionment shall further increase, causing additional financial implications to the DICs, which are not scheduling or scheduling less energy from such RE sources qualified for waiver.*

*The apportioning of waiver allowed by MoP for promotion of certain RE sources, among the DICs, defeats the whole purpose of waiver/ exemption, as is evident from following example:-*

*Say the Monthly ISTS Transmission Charges for Punjab = Rs. 200 Cr. (A)*

*Monthly Waiver in Transmission Charges for Punjab due to RE =  
5% i.e. Rs. 10 Cr. (B)*

*Total Monthly ISTS Transmission Charges for all DICs = Rs. 4000 Cr. (C)*

*Total Monthly Waiver for all DICs = Rs. 200 Cr. (D)*

*Apportioned Waiver amount for Punjab =  $A \times D / C$*

*=  $200 \times 200 / 4000 = \text{Rs. } 10 \text{ Cr. (E)}$*

*Net Waiver for Punjab =  $B - D = 10 - 10 = \text{Nil}$*

*(The Net Waiver may also be negative i.e. payable by Punjab, if the waiver of Punjab is on lower side as compared to the average waiver of rest of States)*

*It is worth mentioning that this Hon'ble Commission, while issuing Supplementary Draft Notification dated 18.08.2022 to the Draft CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022, had proposed to work out  $GNA_{RE}$  for each DIC based on the drawal schedule of such DIC from REGS or RHGS based on wind or solar sources or ESS and deduct such  $GNA_{RE}$  from the total GNA quantum of DIC to allow waiver of transmission charges, which seemed a more rational approach. However, without issuing any Statement of Reasons (SoR), the Commission itself revised the approach for calculation of waiver in the final CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 and by allowing apportionment of waiver among DICs.*

*As such, it is proposed that the provision for apportioning of waiver under Clause 1 (f) of Annexure-III of Sharing Regulations may be done away and/ or the provision of working out  $GNA_{RE}$  for each DIC based on the drawal schedule of such DIC from REGS or RHGS based on wind or solar sources or ESS and deduct such  $GNA_{RE}$  from the total GNA quantum of DIC, may be restored in order to avoid financial implications to DICs on account of apportionment of waiver."*

**This is for your information and further necessary action please.**

  
**Chief Engineer/ PP&R,  
PSPCL, Patiala**