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Sent: Mon, 11 Nov 2024 17:48:55 +0530 (IST)  
Subject: Comments on Draft CERC(Sharing of ISTS charges and  
losses)regulations, 2020 (Fourth ammendment- comments of APPCC-  
regarding

Sir/madam,

          Please find the comments from APPCC on behalf of APDISCOMS on  
the  
Draft CERC(Sharing of interstate Transmission charges and  
losses,)Regulations, 2020 (Fourth amendment) for your kind  
consideration  
please.

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Regards,  
O/o DGM/CGS & PGCIL/APPCC

**Comments of APPCC on Draft CERC(Sharing of ISTS charges and losses)Regulations, 2020 (Fourth Ammendment)**

**Proposed amendment of regulation 13:**

As a drawee DIC, a Green Hydrogen or Green Ammonia Plant having drawl schedule from (i) REGS or RHGS based on wind (including off shore wind) or solar source, (ii) ESS which is meeting at least 51% of its annual electricity requirement for pumping of water or charging of battery with electricity generated from REGS or RHGS based on wind or solar source and (iii) hydro generating station, shall be eligible to waiver considering drawl schedule as per Table under sub-clause (f-iii) or as per sub-clauses(a) to (f-i) of Clause (2) of this Regulation, whichever is higher.

**Illustration:**

(i) A Green Hydrogen plant, which declares COD on 01.01.2032 (eligible for 50% waiver as per Table under sub-clause (f-iii)), is scheduling power from a REGS based on wind source which has declared commercial operation on 01.07.2025 (eligible for 75% waiver under sub-clause (f)). In this case, the drawl schedule from such REGS to such Green Hydrogen plant will be considered @ 75% under Annexure-III.

(ii) A Green Hydrogen plant, which declares COD on 01.01.2030, is scheduling power from a REGS based on a wind source, which has declared commercial operation on 01.07.2027. In this case, the drawl schedule from such REGS to such Green Hydrogen plant will be considered @ 100% under Annexure-III.

**Proposed Ammendment from APPCC:**

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(i) Waiver of transmission charges for the use of ISTS shall be applicable for Green Hydrogen or Green Ammonia Plant as a drawee DIC as follows:

Period of COD (1)	Number of years from COD (2)	% of drawl Schedule to be considered under Annexure-III* (3)
Upto 31.12.2030	25 years	100
01.01.2031 to 31.12.2031	25 years	75
01.01.2032 to 31.12.2032	25 years	50
01.01.2033 to 31.12.2033	25 years	25
After 01.01.2034		0

As a drawee DIC, a Green Hydrogen or Green Ammonia Plant having drawl schedule from (i) REGS or RHGS based on wind (including off shore wind) or solar source, (ii) ESS which is meeting at least 51% of its annual electricity requirement for pumping of water or charging of battery with electricity generated from REGS or RHGS based on wind or solar source and (iii) hydro generating station, shall be eligible to waiver considering drawl schedule as per Table under sub-clause (f-iii) or as per sub-clauses(a) to (f-i) of Clause (2) of this Regulation, *“whichever is latest as per the date of COD”*.

*“Provided, the tenure of the waiver should be in line with the COD of the green Hydrogen plant or in line with the source of REGS depending on which the waiver percentage is being given”*

### **Remarks of APPCC :**

As the drawal is scheduled from the date of COD, it is apt to consider the waiver from the date of COD of the Green Hydrogen plant. It is also to mention that the tenure of the waiver so given is also to be mentioned clearly to avoid any ambiguity and also additional burden on the DICs. As different sources have different time periods for waiver from the respective dates of COD.

### **Illustration:**

If a Green Hydrogen plant whose COD is 01.01.2030 and it is scheduling its power from a Solar plant whose COD is 01.06.2025, what will be the tenure for which it is eligible for waiver i.e is it till year 2050(25 years from 01.06.2025) or till year 2055 (25 years from 01.01.2030)?. The clarification on this is necessary to be mentioned in the regulation.