



Comments of TNPDC on

**Proposal to revise the rate of Congestion
Charge in real-time operation in Inter-State
Transmission of Electricity
vide CERC order dated 13.03.2026 in
Suo Motu Petition No. 1/SM/2026**

Public Hearing on 13.05.2026



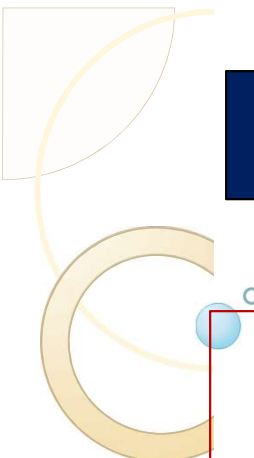
TNPDCL's comments on Applicability of Congestion Charge

The objective of Congestion Charge:

- To maintain Grid Reliability & Security
- To discourage injection or drawal beyond the Available Transmission Capability.

Applicability of Congestion Charge:

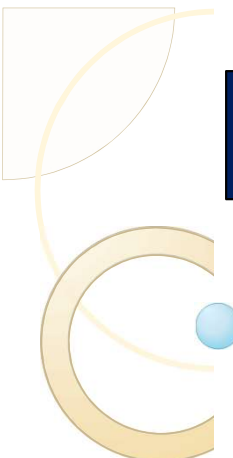
- All entities contributing congestion shall be treated equally and made accountable for their actions.
- So, Congestion Charges shall be applicable to all entities including RE generators to achieve the objective.



TNPDCL's comments on Congestion Charge based on DSM Rates

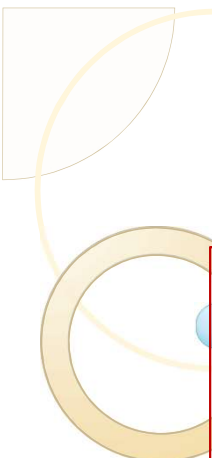
Hon'ble Commission has proposed Congestion Charge based on DSM rates. However, there is disparity in DSM base rates as below:

- **Normal Rate (NR) of Charges for Buyers** – Linked to Market Price & Ancillary Service Charge(highest)
- **Reference Charge Rate (RR) for General Sellers** – Energy Charge adopted/determined/approved by the commission
- **Contract Rate (CR) for VWS or MSW Sellers** - Tariff adopted/determined/ approved by the commission



TNPDCL's comments on Congestion Charge based on DSM Rates (contd...)

- NR is much higher than RR and CR, for the same quantum of deviation.
- General Sellers are allowed to deviate in the frequency band of 49.97 Hz to 50.03 Hz without any penalty, whereas buyers are penalised for any deviation from standard frequency 50 Hz.
- DSM rates for RE generators are not linked to the frequency.
- DSM Regulations 2024 have been challenged before High Courts of Madras, Kerala, Karnataka and Andhra Pradesh and pending.



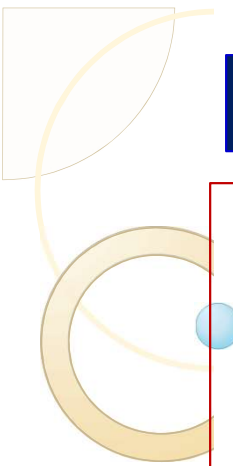
Revision of Generation Schedules under T-GNA to minimise the deviation

The clause pertaining to revision of TGNA in GNA regulation is read as below:

“ 32.1.TGNA granted under exigency application category (or) under advance application category for a period not exceeding one month cannot be revised.”

32.2. TGNA granted under advance application category for a period of more than one month may be reduced for the balance period, with a notice period of one month by the TGNA grantee.”

- GNA Regulations do not prohibit backing down or revision of schedules
- There is restriction in NOAR portal for revision of generation schedules under TGNA
- To maintain grid discipline and ensure real-time balancing, it is imperative to revise generation schedules under T-GNA.



Suggestions of TNPDC

Adoption of discriminatory DSM base rates for computation of congestion charges would further aggravate the financial stress on Discoms, ultimately impacting consumers adversely.

In view of the above, TNPDC requests:

- To adopt a uniform DSM rate in turn congestion rate for all grid-connected entities to ensure equity and non-discrimination.
- Since congestion charges are over and above DSM charges, the same may be restricted to the base rate, instead of the proposed 1.5 times multiplier.
- Issuance of necessary clarification to permit revision of generation schedules under T-GNA, to enable better grid balancing and operational efficiency.

