

**CENTRAL ELECTRICITY REGULATORY COMMISSION
NEW DELHI**

**IA. No. 19/2025
in
Petition No. 319/MP/2022**

**Coram:
Shri Jishnu Barua, Chairperson
Shri Ramesh Babu V., Member
Shri Harish Dudani, Member
Shri Ravinder Singh Dhillon, Member**

Date of Order 02.02.2026

In the matter of:

Application seeking directions against Grid Controller of India Limited (Grid-India) (POSOCO) – NLDC to place on record node-wise drawal details on ISTS and Intra-STS from ISGS concerning Petitioner

And

In the matter of:

1. Tamil Nadu Power Distribution Corporation Ltd.,
(Erstwhile TANGEDCO), NPKRR Maaligai,
144, Anna Salai, Chennai-600 002 Petitioner

Versus

1. Grid Controller of India Limited (GRID-INDIA),
(POWER SYSTEM OPERATION CORPORATION LIMITED (NLDC)),
B-9 (1st Floor), Qutab Institutional Area,
Katwaria Sarai, New Delhi - 110016 Respondent No.1
2. Central Transmission Utility of India Ltd.,
Saudamini, Plot No.2, Sector 29, Near IFFCO
Chowk, Gurgaon - 122001 (Haryana), India Respondent No.2
3. Southern Regional Power Committee,
29, Racecourse Cross Road,
Bengaluru - 560 009 Respondent No.3
4. Powergrid Corporation of India,
Saudamini, Plot No.2, Sector 29, Near IFFCO
Chowk, Gurgaon - 122001 (Haryana), India Respondent No.4
5. Tamil Nadu Transmission Corporation Ltd
NPKRR Maaligai, 144, Anna salai,



Parties Present:

Shri Amit Kapur, Advocate, TANGEDCO
Shri S. Vallinayagam, Advocate, TANGEDCO
Shri Avdesh Mandloi, Advocate, TANGEDCO
Shri Alok Shankar, Advocate, CTUIL
Dr. R. Katihraavan, TANGEDCO
Dr. G. Balamurali, TANGEDCO
Shri Gajendra Sinh V., NLDC
Ms. Sonali Mangal, NLDC
Shri Akshayvat Kislay, CTUIL

ORDER

Tamil Nadu Generation and Distribution Corporation Limited (TANGEDCO) has filed the instant Interlocutory Application (IA) seeking directions against Grid Controller of India Limited (Grid-India) (POSOCO) – NLDC to place on record node-wise drawal details on ISTS and Intra-STS from the ISGS concerning the Petitioner.

2. The Petitioner has made the following prayers in the present IA :

- (a) *Direct NLDC to bring on record before this Hon'ble Commission, block-wise drawal details of the applicant using an inter-state transmission system and ISTS and Intra-STS from ISGS for the period from 2018-2019 to 2023-2024.*
- (b) *Direct NLDC to provide the list of state-wise ISGS which are connected to both ISTS and Intra-STS along with their block wise drawl details for the period from 2018-2019 to 2023-2024.*
- (c) *Pass any other order or further relief(s) as may be deemed fit in the present facts and circumstances of the case.*

Prayers in the Main Petition

- a) *Admit the present petition and direct the Respondent No.1 NLDC to exclude the entire quantum of power allocated to TANGEDCO from NLC TPS II- Stage II (350.59 MW), NTECL Vallur (998 MW), NTPL (388 MW) and part quantum of 300 MW in KKNPP drawn through TANTRANSCO network from the total LTA of TANGEDCO considered for calculation of ISTS transmission charges and losses.*
- b) *Direct the respondent No. 1 to revise the computation of transmission charges and losses and with effect from 1.11.2020 and notify the revised charges payable by the DICs.*
- c) *Direct SRPC to notify the revised RTA/RTDA based on revised LTA notified by respondent no.1.*

- d) *Direct the respondent no.3 to revise the calculation of transmission loss corresponding to the excluded capacity drawn using TANTRANSCO network and to refund the transmission losses corresponding to the excluded capacity at applicable rate for the four generating stations mentioned in this petition for the corresponding period.*
- e) *Direct the respondents to compensate the indirect loss incurred by the petitioner on account of purchase of power from other sources to meet the “quantum of power” reduced by respondents on account of ISTS losses due to non-compliance of Regulation 13(11) of Sharing Regulation 2020.*
- f) *Direct the defaulting respondents (1) & (2) to bear the petition filing fee.*
- g) *Pass any other order or orders as this Hon'ble Commission may deem fit and proper in the facts and circumstances of the case.*

The pleadings made in the IA has been considered in the instant Order. However, the Prayers made in the main Petition have been included only for reference.

Submissions of Petitioner

3. The Petitioner has made the following submissions:

- a) The Commission notified the CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2020, vide notification dated 04.05.2020 (hereinafter 'the Sharing Regulations, 2020'). These Regulations are required to be complied with by all statutory bodies and Designated ISTS Customers (DICs).
- b) NLDC, being nominated as the Implementing Agency (IA), has notified the Procedure for computation and sharing of Inter-State Transmission System Charges in September 2020. As per the NLDC procedure, transmission charges and losses in respect of ISTS lines are required to be calculated on the basis of the LTA / MTOA quantum relating to the ISTS network used by a DIC for the drawal of power from the CGSs using ISTS lines. This quantum of LTA /MTOA is required to be furnished by CTUIL to NLDC.
- c) Based on the information notified by NLDC, the monthly Regional Transmission Account (RTA) is prepared and published by the Southern Regional Power Committee (SRPC) for the Southern Regional beneficiaries.
- d) TNPDC (Erstwhile TANGEDCO) had entered into a Power Purchase Agreement with various Central Generating Stations / Inter-State Generating Stations. Among the generating stations, four generating stations have connectivity with ISTS

as well as Intra State Transmission Lines, and one station is connected exclusively through the Intra State Transmission Network. The details are as below:

Sl. No.	Name of the Generating Station	Capacity in MW	Ex-Bus power excluding Aux	TANGEDCO's share of MW	Evacuation/ connectivity
1	Madras Atomic Power Station	440	393.8	296.14	Only Intra State
2a.	NLC TPS-II- Stage I	630	521.98	169.95	Both ISTS and Intra State
2b.	NLC TPS-II- Stage II	840	711.02	253.69	
3	NTECL, Vallur	1500	1406.25	998.29	
4a.	NPCIL, Kudankulam NPP (KKNPP) Unit I	1000	922	543.06	
4b.	NPCIL, KKNPP Unit II	1000	922	518.63	
5	NTPL	1000	942.5	388.78	
	Total Share			3168.54	

e) In respect to MAPS, evacuation is done only through the State Network. With respect to NLC TPS II-Stages I and II, though there are both ISTS and State connectivity, the entire quantum of TANGEDCO's allocation is drawn only through the State Network. The capacity of the State Network is more than adequate to draw TNPDC's (Erstwhile TANGEDCO) allocation.

f) NTECL Vallur, the 400 kV D/c line (twin moose) between NTECL Vallur and NCTPS Stage II owned by TANTRANSCO is adequate to transfer the full allocation of 998 MW. The two 230 kV lines owned by TANTRANSCO emanating from KKNPP are capable of transferring 300 MW, i.e., part capacity allocation to TNPDC (Erstwhile TANGEDCO).

g) The Sharing Regulations 2020 came into force on 01.11.2020 allocate the ISTS charges and losses primarily based on the LTA+MTOA quantum.

h) As per the Procedure for Collecting Data and Information for determining Inter-State Transmission Charges and Losses, CTUIL is required to furnish the break-up details of LTA/MTOA for all the generating stations connected to both the ISTS and intra-State transmission systems. However, without following the provisions of the Regulations and its own Detailed Procedure, the first respondent notified the ISTS transmission charges and losses by including the quantum of power drawn from CGS through the TANTRANSCO network as "deemed LTA". Not excluding the quantum of allocated capacity using State Transmission Lines is in direct violation of the Sharing Regulations 2020.

- i) During the 39th TCC/SRPC meetings held on 3rd and 6th December 2021, the matter was deliberated. Despite the repeated request from TNPDC (Erstwhile TANGEDCO) to consider all four cases in line with the Commissioner's various orders and in line with the provisions of THE Sharing Regulations, CTUIL and SRPC were not inclined to consider the views of TNPDC (Erstwhile TANGEDCO). Upon the vehement insistence of TNPDC (Erstwhile TANGEDCO), the committee agreed to recommend only the MAPS and NLC TPS-II stage-I cases.
- j) There is no correlation between the exclusion of the quantum drawn through the State network and approval during the originally planned scheme. The regulatory framework for these evacuation lines during the planning stage is entirely different from the regulatory provisions under the present scenario.
- k) In addition, CTUIL cannot insert any new term or word to suit its convenience in a subordinate legislation. The term "Originally planned" is sought to be referred to and read in the regulation by CTUIL. Such an endeavour on the part of a nodal agency like CTUIL is highly objectionable and illegal. The intention of CTUIL is to introduce a new concept and treat the Intra-State transmission lines/ system planned for evacuating power directly from CGS stations as lines not intended for power evacuation. CTUIL cannot seek to include the quantum of power drawn by the petitioner using the STU, planned and commissioned at the cost of consumers of the State of Tamil Nadu.
- l) Based on the recommendation of SRPC and CTUIL, vide letter dated 21.01.2022, NLDC, vide notification dated 31.01.2022, has exempted the LTA quantum in respect of MAPS and NLC TPSII Stage-I alone for the computation of transmission charges for the billing month February 2022. The deemed LTA associated with other stations has not been excluded.
- m) The Ministry of Power (MoP), vide letter dated 28.03.2022, has reallocated the surrendered share of Telangana State in NLC TPS-II (stage I & II) for 149.27 MW. In this regard, the revised shares of Telangana in Stages I & II are 0.93% and 0.92%, respectively, and the total allocation of TNPDC (Erstwhile TANGEDCO) in Stages I & II has been revised to 38.73% MW and 45.56 % MW, respectively.
- n) The Petitioner, vide letter dated 01.04.2022, requested Respondent No.1, NLDC, to exclude the total share of TNPDC (Erstwhile TANGEDCO) in respect of Stage-I, including the additional quantum for computation of ISTS transmission

charges and losses, as well as for computing the RTDA in line with the Sharing Regulations, 2020

o) Respondent No.1 NLDC, vide notification dated 05.04.2022, exempted the additional 52.37 MW drawn through the State network regarding Stage I in line with the Sharing Regulations, 2020. However, NLDC did not exempt the additional 96.90 MW of power drawn through the State network from Stage II.

p) The respondents refuse to calculate the ISTS charges and losses applicable to the quantum of LTA and MTOA corresponding to the capacity connected with the ISTS alone. Similarly, the respondents refuse to calculate transmission deviation charges for the actual injection in the CTUIL system, in excess of LTA+MTOA+STOA, on the CTU system.

q) The applicant is making payment of the transmission charges based on the quantum of transmission charges notified by SRPC. However, no supporting data is on record used in the Regional Transmission accounting provided to the applicant. The transmission charges are calculated based on the quantum of power drawn at each node from the ISTS system, as noted by NLDC. SRPC uses this data to arrive at the regional transmission account.

r) The drawal details at every node from Interstate Generating Stations using ISTS lines and Intra-STS concerning the applicant are required to be brought on record by NLDC for the proper adjudication of the issues raised by the applicant in the accompanying Petition seeking to exclude the entire quantum of power allocated to the applicant from the Central Generating Stations where electricity is drawn using that State Transmission Utility transmission network.

s) The applicant is seeking a direction against NLDC [POSOCO] to bring on record the node-wise data relating to the LTA quantum drawn through the ISTS and Intra-STS from ISGS. This data is just and necessary for adjudicating the relief sought in the petition, namely excluding the entire quantum of power allocated to TNPDC (erstwhile TANGEDCO) from the total LTA of TNPDC (erstwhile TANGEDCO) considered for calculation of ISTS transmission charges and losses. The NLDC be directed to place on record the node-wise drawal data relating to the applicant through ISTS and Intra-STS from ISGS.

Hearing dated 28.04.2025



4. RoP for the hearing dated 28.04.2025 is as under:

“Learned counsel for the Petitioner submitted that, despite the directions of the Commission vide previous RoPs, the CTUIL did not furnish the data pertaining to a detailed breakup of the LTA/MTOA in respect of all the generating stations connected with both the ISTS and intra-State transmission system in terms of Regulation 13(11) of the 2020 Sharing Regulations. He further submitted that the Petitioner had also filed an Interlocutory Application No. 19/2025 seeking block-wise drawal data for the period from FY 2018-2019 to FY 2023-24 from the NLDC.

2. Learned counsel for the Central Transmission Utility of India Limited (CTUIL), sought permission to upload/file an affidavit on the e-filing Portal in compliance with the Record of Proceedings (RoP) dated 19.2.2025, wherein the Commission had directed CTUIL to submit the details of the quantum of LTA/MTOA in respect of all regional entity generating stations connected with both the ISTS and intra-State transmission systems located in the State of the Petitioner and covered under the instant Petition for the period from 1.11.2020 till 30.9.2023. He further submitted that the said affidavit has been served upon all the concerned parties, including the Petitioner.

3. After the hearing, the Commission acceded to the request of CTUIL and directed the Registry to open the portal to enable CTUIL to file its compliance affidavit.”

Submissions of Respondent CTUIL

5. The CTUIL, vide affidavit dated 24.04.2025, has submitted the following allocation (in MW) of power to TANGEDCO from the respective generators, has been considered for billing for the period from November, 2020 to September, 2023:

Allocation (in MW) of TANGEDCO considered in billing for the period from November, 2020 to September, 2023

Name of the generating station / Month	Madras Atomic Power Station (MAPS)	NTECL Vallur	NLC TPS II- Stage I	NLC TPS II- Stage II,	Kudankulam APS,	NTPL Tuticorin	Total
Nov-20	295.5868	995.2683	169.4133	252.8010	543.2884	385.8544	2642.212144
Dec-20	295.8200	996.9853	169.0432	252.2236	543.2190	390.7620	2648.053059
Jan-21	296.1050	998.9667	167.0577	248.4407	543.1190	385.6556	2639.344732
Feb-21	296.131248	997.308	169.964838	253.651935	543.119	388.027	2648.202021
Mar-21	296.142	982.319397	169.052477	252.269259	543.095411	376.284	2619.162544
Apr-21	296.138	1001.993713	170.846546	253.741933	543.057411	389.666587	2655.44419
May-21	296.138	998.454	168.125119	251.708982	543.057411	384.547	2642.030512
Jun-21	296.138	994.655	169.538496	252.091972	543.057411	388.605	2644.085879
Jul-21	296.138	991.40941	169.289162	252.296968	543.057411	387.600411	2639.791362
Aug-21	296.138	985.894402	170.044515	251.283638	543.057411	387.595	2634.012966
Sep-21	296.138	997.78371	170.414203	253.437227	543.057411	390.118	2650.948551
Oct-21	296.138	939.980668	161.296871	237.107331	543.057411	350.883139	2528.46342
Nov-21	296.138	998.900421	170.460531	254.138209	543.057411	386.671	2649.365572
Dec-21	296.138	1001.033712	169.69	253.123948	543.057411	388.914	2651.957071



Jan-22	296.138	996.563291	169.51635	253.080593	543.057411	383.915	2642.270645
Feb-22	296.138	989.724408	168.991324	252.098618	543.057411	387.203	2637.212761
Mar-22	296.138	987.186702	172.775	258.827447	543.057411	374.789	2632.77356
Apr-22	296.138	975.269	215.742	338.756424	543.057411	354.870623	2723.833458
May-22	296.138	965.987374	206.153395	314.629035	543.057411	315.163331	2641.128546
Jun-22	296.137	991.052705	213.455	334.829994	543.058	371.21	2749.742699

Hearing on 10.11.2025

6. RoP for the hearing dated 10.11.2025 is as under:

*“At the outset, the learned counsel for the Petitioner, referring to the Record of Proceedings (RoP) dated 19.2.2025, submitted that the Petitioner has filed Interlocutory Application (IA) No. 19 of 2025 seeking a direction to **NLDC to place on record the block-wise drawl data for the period from 2018-2019 to 2023-24, as well as to provide a list of State-wise ISGS connected with both ISTS and intra-STS, along with their block-wise drawl details for the same period.** He further submitted that, according to CTUIL’s submissions, block-wise data was not available with it, and NLDC has not yet responded to the issuance of data. He also stated that, in compliance with the directions of the Commission vide RoP dated 19.2.2025, CTUIL, through an affidavit dated 24.4.2025, furnished the quantum of the LTA/MTOA only with respect to **regional entity generating stations connected with both ISTS and intra-State transmission systems.** Learned counsel urged the Commission to dispose of the IA No. 19 of 2025 based on the documents available on the record.*

2. The learned counsel for the CTUIL submitted that CTUIL is raising the bills based on the data made available to it.

3. After the hearing, the Commission reserved the order on the IA No. 19 of 2025.”

Analysis and Decision

7. We have considered the submissions of the Petitioner, Respondent and perused the facts available on record.

8. The Petitioner in the instant IA No. 19/2025 has reiterated its submission made under the main Petition and prayed that the Commission directs NLDC to furnish (i) the block-wise drawal details of the applicant using an inter-State transmission system and Intra-STS from ISGS for the period from 2018-2019 to 2023-2024, and (ii) list of State-wise ISGS, which are connected with both ISTS and Intra-STS along with their block wise drawal details for the period from 2018-2019 to 2023-2024.

9. We have considered the submissions of the Petitioner. Under this Order, only the prayers made in the IA have been discussed.



10. The Sharing Regulations, 2020, came into force from 01.11.2020, provides as under:

“4. Components of Transmission Charges

Transmission charges for DICs shall have the following components:

- a. National Component (NC);*
- b. Regional Component (RC);*
- c. Transformer Component (TC); and*
- d. AC System Component (ACC).*

.....
5. Components and sharing of National Component (NC)

.....
(4) The Yearly Transmission Charges for the National Component shall be shared by all drawee DICs and injecting DICs with untied LTA in proportion to their quantum of Long Term Access plus Medium Term Open Access and untied LTA respectively.

6. Components and sharing of Regional Component (RC)

.....
(2) Yearly Transmission Charges covered under sub-clause (a) of Clause (1) of this Regulation shall be shared by drawee DICs of the receiving region and injecting DICs with untied LTA in the receiving region, in proportion to their quantum of Long Term Access plus Medium Term Open Access and untied LTA, respectively.

.....
7. Components and sharing of Transformer Component (TC)

.....
(2) Transformer Component for a State shall be borne and shared by the drawee DICs located in the concerned State in proportion to their Long Term Access plus Medium Term Open Access.

8. Components and sharing of AC System Component (ACC)

.....
(5) Transmission charges under AC-BC shall be shared by all drawee DICs and injecting DICs with untied LTA in proportion to their quantum of Long Term Access plus Medium Term Open Access and untied LTA respectively.

9. Computation of share of transmission charges under AC-UBC

.....
(3) MTC covered under AC-UBC shall be apportioned on transmission lines of the Basic Network, whose charges have been included in the Yearly Transmission Charges. Such apportionment shall be made on per circuit kilometer basis for each conductor configuration at each voltage level as per the methodology specified in Annexure-I of these regulations, for obtaining transmission line-wise transmission charges for each conductor configuration at each voltage level.”

As per the above provisions, ISTS transmission charges to be recovered from the DICs is required to be calculated based on the LTA and MTOA of the corresponding DIC.

11. Regulation 13(11) of the Sharing Regulations, 2020 provides as under:

“(11) Where a generating station is connected to both ISTS and intra-State transmission system, only ISTS charges and losses shall be applicable on the quantum of Long-Term Access and Medium-Term Open Access corresponding to capacity connected to ISTS.”

The above provision provides that the ISTS charges and losses shall be applicable only for the quantum of LTA and MTOA corresponding to the capacity connected to the ISTS.

12. We note that the Petitioner under the main Petition has prayed to exclude the entire quantum of power allocated to TANGEDCO from NLC TPS II- Stage II (350.59 MW), NTECL Vallur (998 MW), NTPL (388 MW) and part quantum of 300 MW in KKNPP drawn through TANTRANSCO network from the total LTA of TANGEDCO considered for calculation of the ISTS transmission charges and losses, and accordingly, issue the direction for revision of the transmission charges, losses and RTA/RTDA with effect from 1.11.2020 and refund the transmission losses corresponding to the excluded capacity at applicable rate for the mentioned four generating stations. The Petitioner in the main Petition, has contended that TANGEDCO raised this issue with SRPC, POSOCO, and CTUIL through various correspondences and requested to exclude the quantum of power drawn through the State network. However, the POSOCO and CTUIL did not exclude the quantum of TANGEDCO's drawal of power from the Central Generating Stations (CGS), drawn using the TANTRANSCO network, for the purpose of computation of transmission charges and losses. The Petitioner has submitted that after a prolonged struggle by TANGEDCO, it was decided by SRPC during the 39th SRPC meeting to exclude the LTA quantum in respect of MAPS and NLC TPS-II-Stage-I alone.

13. We note that based on the request of the CTUIL and TANGEDCO in this matter, SRPC has convened a special TCC meeting on 18.10.2021, wherein it was decided to form a Sub-Group under SRPC Secretariat with the representatives from CTUIL, NLDC, SRLDC, and SLDCs of SR to formulate an Objective Methodology/ General Philosophy to be adopted for determining the Long Term Access and Medium Term Open Access corresponding to capacity connected with the ISTS in case of Generating Stations

connected with the both ISTS and intra-State transmission system and submit its recommendations to TCC within one month. Accordingly, a Sub-Group was formed with the representatives (Technical & Commercial) from APTRANSCO, KPTCL/PCKL, KSEBL, TANTRANSCO, TANGEDCO, TSTRANSCO, Puducherry ED, CTUIL, NLDC & SRLDC. This Sub-group vide its record notes of the Second meeting held on 22.11.2021 has given its recommendation to the TCC/SRPC, which is extracted as below:

“CONCLUSIONS/RECOMMENDATIONS OF THE SUB-GROUP

a) *Following methodology was agreed in principle by the Sub-Group for ascertaining the adequacy of intra-STU Network to evacuate their share from a GS connected to both STU system & ISTS:*

- i) The intra-STU network planned and implemented at the time of commissioning of the concerned Central Generating Station (CGS) only to be considered.*
- ii) ISTS Network connected to CGS may be taken out of service and CGS may be left connected with intra-state transmission system (STU network) of home state. If the home state STU system is meeting the all the criteria as per the transmission planning criteria to evacuate their share, then that quantum may be considered for exemption in the computation of sharing of transmission charges.*
- iii) Latest ATC/TTC All India Peak Base Case may be used for this purpose.*
- iv) Ex-Bus Firm + Un-allocated quantum of the beneficiaries (i.e., 100% of CGS net capacity) to be considered to evaluate whether the home state STU system is capable of evacuating their share.*

However, TANGEDCO has expressed the concern on considering only the originally approved transmission system and opined that it may be appropriate to consider the present Intra-State Transmission system connected to the Generating Station for evaluation of the capacity to be evacuated through Intra-State Transmission system for LTA exemption.

b) *Following Generating Stations of SR connected to both ISTS and intra-State Transmission System have been considered and concluded as below:*

SN	Generating Station	Observation	Conclusion/ Recommendation
1	NTPC Kudgi STPS	LTA was granted by CTU	These Generating Stations have not been considered by the Sub-Group for ascertaining the adequacy of intra-STU Network to evacuate their share from GS.
2	Neyveli New Thermal Power Station (NNTPS)	LTA was granted by CTU	
3	NTPC Simhadri STPS Stage I	CERC vide Order 30.03.2017 in petition No. 291/MP/2015 has exempted LTA.	
4	UPCL	LTA was granted by CTU	
5	NTPC Ramagundam STPS Stage I & II	In line with the agreed methodology, TSTRANSCO system is capable of evacuating Telangana share.	LTA may be exempted for Telangana for the quantum of its share from Ramagundam STPS Stage-I & II.

6	<i>NTPC Ramagundam STPS Stage III</i>	<i>RSTPS Stage III was planned to evacuate fully through the ISTS.</i>	<i>LTA exemption may not be considered.</i>
7	<i>NLC TPS II Stage I</i>	<i>In line with the agreed methodology, TANTRANSCO system is capable of evacuating Tamil Nadu share.</i>	<i>LTA may be exempted for Tamil Nadu for the quantum of its share from NLC TPS II Stage I.</i>
8	<i>NLC TPS II Stage II</i>	<i>400kV lines were identified for evacuation of power from NLC TPS II Stage II. However, TANGEDCO submitted that the entire Tamil Nadu share from NLC TPS II Stage I & Stage II can be evacuated through their intra-state transmission system.</i>	<i>LTA exemption for Tamil Nadu may not be considered.</i>
9	<i>NTECL, Vallur TPS</i>	<i>There was divergence of views as below: TANGEDCO: The interconnecting line (400 kV Vallur TPS – NCTPS St II D/c line) was considered for evacuation of power from NTECL as well as the reliability. CTUIL: The interconnecting line was planned as the ATS of NCTPS St-II and not in the evacuation scheme of NTECL Vallur TPS.</i>	<i>Case may be considered by TCC/SRPC.</i>
10	<i>NPCIL, KKNPP</i>	<i>KKNPP was planned to be evacuated fully through the ISTS</i>	<i>LTA exemption for Tamil Nadu may not be considered.</i>
11	<i>NPCIL, Kaiga GS Stage-I & II</i>	<i>400 kV ISTS were planned for evacuation of both the stages and no intra-State transmission system was considered for evacuation</i>	<i>LTA exemption for Karnataka may not be considered</i>

c) NPCIL MAPS Kalpakkam: Case may be considered by TCC/SRPC.

V. CONCLUSION

MS, SRPC thanked the members and participants for their active participation in the meeting. The outcome of the Sub-Group would be put up to TCC/SRPC in the 39th TCC/SRPC Meetings scheduled on 03.12.2021/06.12.2021.

14. We have also perused the MoM of the 39th meetings of TCC and SRPC held on 03.12.2021 and 06.12.2021, wherein the recommendations of the LTA sub-group were discussed. Extract of the Minutes of Meetings is as under:

“5.9 Decision/ Recommendation

- i) *The findings/ suggestions of TCC/ SRPC along with the recommendations of the LTA Sub-Group w.r.t. CGS/ ISGS in SR would be submitted to the Committee to be formed by CERC at National level.*



- ii) MS, SRPC to address a letter to Implementing Agency (NLDC) and CTUIL conveying the recommendations of the LTA Sub-Group and TCC/ SRPC decisions for consideration. NLDC may also be requested to consider LTA exemption of Tamil Nadu for its share from MAPS in line with the CERC orders of similarly placed generators.
- iii) NLDC to seek the clarification from CERC on the request/ recommendations of SRPC."

15. Subsequent to the 39th meetings of TCC and SRPC held on 03.12.2021 and 06.12.2021, SRPC vide letter dated 16.12.2021 requested the following to NLDC:

"

In the 39th meetings of TCC/ SRPC held on 03.12.2021/06.12.2021, the recommendations of the Sub-Group have been further deliberated and decided, the following:

- a) *The Implementing Agency (NLDC) may exempt deemed LTA quantum from the computation of monthly transmission charges in respect of the following:*
 - i. *Telangana quantum of share from Ramagundam STPS Stage I & II*
 - ii. *Tamil Nadu quantum of share from NLC TPS II Stage I.*
- b) *NLDC may be requested to exempt deemed LTA of Tamil Nadu from Madras Atomic Power Station (MAPS), NPCIL (connected to only TN STU system) in line with the CERC Orders of similarly placed generators.*

In view of the above, it is requested, that NLDC may kindly implement the above decisions of SRPC favorably.

While approving this letter, Chairperson, SRPC opined to exclude the deemed LTA of Tamil Nadu and Telangana in respect of the above three Stations and also to revise the ISTS transmission charges and losses from the effective date of implementation of the Sharing Regulations 2020 i.e. 01.11.2020."

16. We observe from the recommendation of the Sub-Group formed under SRPC Secretariat and the deliberation at SRPC, the methodology adopted by SRPC for determining the quantum of LTA and MTOA corresponding to the capacity connected to the ISTS for the dual connected generators, mainly lies on the principle that (i) the concerned intra-State transmission network should have been planned and implemented at the time of commissioning of the concerned Central Generating Station (CGS) only to be considered, and (ii) the intra- State Network should have been adequate to evacuate the State's share of power from CGS. Accordingly, SRPC has also requested NLDC to exempt the deemed LTA of Tamil Nadu from MAPS and NLC TPS II Stage I from the computation of transmission charges.

17. We have also perused the Commission's Order dated 18.01.2024 in Petition No. 224/MP/2022 on a similar matter, wherein the Petitioner, PCKL, had prayed to exclude the quantum of share of the Petitioner in UPCL drawn through the State Transmission Network from the total LTA considered for computation of ISTS charges and losses as per the provisions of the 2020 Sharing Regulations and Detailed Procedure for the period starting from 1.11.2020. The relevant extract of the Order dated 18.1.2024 is as below:

"26. We observe in the instant case that PPA was signed between Udupi and PCKL way back in 2005. The PPA clearly provided that KPTCL shall construct the transmission lines from Udupi (then Nagarjunasagar) to 220 KV Kemar/Kuvor and 400 kV Hassan. However, the moot question which arises for our consideration is how much capacity of Udupi is to be considered as connected to ISTS under Regulation 13(11) of the 2020 Sharing Regulations?"

27. In this regard, we have perused the principles of the adequacy of the STU system recommended by the sub-group of LTA for consideration under Regulation 13(11) of the 2020 Sharing Regulations quoted as follows:

"i) The intra-STU network planned and implemented at the time of commissioning of the concerned Central Generating Station (CGS) only to be considered. ii) ISTS Network connected to CGS may be taken out of service and CGS may be left connected with intra-state transmission system (STU network) of home state. If the home state STU system is meeting the all the criteria as per the transmission planning criteria to evacuate their share, then that quantum may be considered for exemption in the computation of sharing of transmission charges. iii) Latest ATC/TTC All India Peak Base Case may be used for this purpose. iv) Ex-Bus Firm + Un-allocated quantum of the beneficiaries (i.e., 100% of CGS net capacity) to be considered to evaluate whether the home state STU system is capable of evacuating their share."

28. We direct that NLDC shall calculate the quantum of LTA to be exempted for payment of ISTS charges towards the LTA quantum of Udupi from the date of effectiveness of the 2020 Sharing Regulations, based on the above quoted principles. Under clause (ii) of the above-quoted principles, Udupi generation may be assumed as connected to ISTS at Hassan and intra-state at Hassan & Udupi through 400/220 kV ICT.

29. NLDC is directed to calculate the quantum of such LTA to be exempted for payment of ISTS charges by the Petitioner within a period of one month of the date of issue of this Order. Accordingly, the RTA/ RTDA shall be revised by SRPC within a period of 30 days thereafter."

In the above order, to calculate the capacity connected with the ISTS, the principles suggested by the sub-group of SRPC have been relied upon. It is noted that the methodology to determine the capacity connected to the ISTS for Regulation 13(11) of Sharing Regulations, 2020, nowhere relies on actual drawal data by the State.

18. The issue involved in the Petition pertains to the period from 1.11.2020 to 31.10.2023 to determine the capacity connected to the ISTS for the purpose of Regulation 13(11) of the Sharing Regulations, 2020. The Petitioner has sought actual drawal data for its State as well as for all Indian States for the period from 2018-2019 to 2023-24. Regulation 13(11) of the Sharing Regulations provides that ISTS charges and losses shall apply only to the quantum of LTA and MTOA corresponding to the capacity connected to ISTS. The methodology for the determination of capacity connected to the ISTS for the purpose of Regulation 13(11) of the Sharing Regulations, as recommended by SRPC and considered by the Commission in Petition No. 224/MP/2022, has no relevance to the actual drawal by the State from the corresponding generators. Further, the actual drawal by the State, time-block-wise, at the inter-State-intra-State periphery, is already available with the State for the calculation of DSM accounts.

19. We also observe that the prayers made by the Petitioner under the main Petition are mainly pertaining to the exclusion of the entire quantum of power allocated to TANGEDCO from NLC TPS II - Stage II (350.59 MW), NTECL Vallur (998 MW), NTPL (388 MW), and a part quantum of 300 MW in KKNPP drawn through the TANTRANSCO network from the total LTA of TANGEDCO considered for calculation of the ISTS transmission charges and losses. Whereas under the instant IA, the Petitioner is seeking the block-wise drawal data of the applicant through the ISTS as well as intra-State transmission system, the list of State-wise ISGS, which are connected to both ISTS and Intra-STS, along with their block-wise drawal details for the period from 2018-2019 to 2023-2024.

20. Considering the above discussion and the prayers made under the main Petitions vis-à-vis the prayers made under the instant IA, no relevance of the actual drawal from ISGS connected to both ISTS and intra-STS is established for the instant matter. Therefore, we do not find any merit or relevance in providing the actual drawal data of the Petitioner from

the generating stations connected with ISTS as well as intra-State. Accordingly, the prayer (a) of the Petitioner in the instant IA is rejected.

21. Further, the Petitioner at prayer (b) has prayed to provide the list of the State-wise ISGS which are connected to both ISTS and Intra-STS along with their block-wise drawal details for the period from 2018-2019 to 2023-2024. Since the Petitioner has not established the requirement or any relevance of such drawal data of the other State in its prayers made under the main Petition, we do not find any relevance in providing such drawal data of the other State. Accordingly, the prayer (b) made under the instant IA is rejected.

22. IA.No.19/2025 in Petition No.319/MP/2022 is disposed of in terms of the above.

Sd/-
(Ravinder Singh Dhillon)
Member

Sd/-
(Harish Dudani)
Member

Sd/-
(Ramesh Babu V.)
Member

Sd/-
(Jishnu Barua)
Chairperson

