

20th Sept 2022

Shri Harpreet Singh Pruthi
Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi-110001

Subject: - Comments/Suggestions on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 and Supplementary Draft Notification

Dear Sir

Amp Energy India is India's First Truly Balanced Renewable Energy Company. With a current portfolio of about 2GWp+ spread across 15 states in the country, Amp Energy India is one of India's only triple play renewable developer having a balanced portfolio of C&I and utility customers.

Amp Energy India is one of the few developers that has the capability to provide diversified solutions to its customers in niche segments (Solar, Hybrid, Floating Solar) on a large scale. These solutions help utility customers to meet their renewable energy targets, reduce their power purchase cost and also fulfil their renewable purchase obligations. By building large scale renewable energy projects in India, Amp is supporting the Government of India's vision of Make in India by generating renewable power in India.

Amp Energy India is the Indian arm of the Amp Energy Group headquartered in Toronto, Canada. Having the backing of leading international institutional investors such as LGT Lightrock, CIP, SMBC, CBRE Caledon and CIIF/Kotak, Amp Energy India has a deep debt and equity financing expertise and adheres to high ESG and corporate governance standards in compliance with IFC standards.

This is with reference to the notice inviting suggestions/comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 dated 11th June 2022 and Supplementary Draft notification dated 18th August 2022. We are submitting our comments as **Annexure-I** for your reference.

We request Hon'ble CERC to kindly consider our comments/suggestions while finalizing the Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 and the Supplementary Draft.

Your Sincerely
For Amp Energy India Private Limited



Shriprakash Rai
Senior Director

ANNEXURE- I

COMMENTS ON PROPOSED DRAFT CENTRAL ELECTRICITY REGULATORY COMMISSION (SHARING OF INTER-STATE TRANSMISSION CHARGES AND LOSSES) (FIRST AMENDMENT) REGULATIONS, 2022

S.No.	Reference Clause	Proposed/Existing Clause	Recommended Clause	Rationale
1	2(1)(h)	<p>‘Connectivity Regulations, 2009’ means the Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium term Open Access in inter State Transmission and related matters) Regulations, 2009 and any subsequent amendments or re-enactments thereof;</p> <p>Drawee DIC’ shall mean the DICs which draw power through ISTS but does not include ESS</p>	<p>Connectivity Regulations, 2009’ means the Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium term Open Access in inter State Transmission and related matters) Regulations, 2009 and any subsequent amendments or re-enactments thereof;</p>	<p>The proposed amendment suggests substitution definition “Connectivity Regulations, 2009” with definition of Drawee DIC.</p> <p>We agree that the definition of Connectivity Regulations 2009 needs to be deleted as same is replaced by recently notified GNA Regulation. But, substituting it with definition of Drawee DIC will be create ambiguity as clause 2(1)(j) also defines DIC.</p> <p>We suggest that this substitution should be done at clause 2(1)(j).</p>
2	2(1)(j)	<p>‘Designated ISTS Customer’ or ‘DIC’ means the user of any transmission element(s) of the</p>	<p>Designated ISTS Customer’ or ‘DIC’ means the user of any transmission element(s) of</p>	<p>As per the proposed amendment and the GNA</p>

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		Inter-State Transmission System (ISTS) and shall include generating station, State Transmission Utility (STU), distribution licensee including State Electricity Board or its successor company, Electricity Department of State and any other entity directly connected to the ISTS and shall include an intra-State entity or a trading licensee that has obtained Medium Term Open Access or Long Term Access to ISTS	the Inter-State Transmission System (ISTS) and shall include generating station, State Transmission Utility (STU), distribution licensee including State Electricity Board or its successor company, Electricity Department of State and any other entity directly connected to the ISTS and shall include an intra-State entity or a trading licensee that has obtained Medium Term Open Access or Long Term Access to ISTS Drawee DIC' shall mean the DICs which draw power through ISTS but does not include ESS.	Regulations Transmission charges are now to be recovered from the drawee entities. Substitution for Drawee DIC definition in place of referred clause will be more appropriate.
3	3(4)	Sharing of transmission charges for DICs shall be based on the technical and commercial information provided by the DICs, inter-State transmission licensees, NLDC, RLDCs, SLDCs and CTU to the Implementing Agency.	Sharing of transmission charges for DICs shall be based on the technical and commercial information provided by the DICs, inter-State transmission licensees, NLDC, RLDCs, SLDCs and CTU to the Implementing Agency.	Transmission charges are to be shared by Drawee DICs only. We suggest to omit the word DICs
4	7(1)	Transformer Component for a State shall comprise of Yearly Transmission Charges for inter-connecting transformers (ICTs) along with their associated bays and downstream bays planned for drawal of power by the concerned State. A list of such transformers for each State shall be provided by the Central Transmission Utility to the Implementing Agency.	Transformer Component for a State shall comprise of Yearly Transmission Charges for inter-connecting transformers (ICTs) along with their associated bays and downstream bays planned for drawal of power by the concerned State. A list of such transformers and bays for each State shall be provided by the Central	The list should comprise of ICTs and associated bays for determination of the transformer component.

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			Transmission Utility to the Implementing Agency.	
5	11(1)	<p>T-GNA Rate (in Rs./MW/block) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under:</p> <p>Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) X 1.10/ (number of days in a month X 96 X GNA quantum in MW, for all such entities located in the State considered for billing, for the corresponding billing period.</p>	<p>T-GNA Rate (in Rs./MW/block) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under:</p> <p>Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) X 1.10 1.00/ (number of days in a month X 96 X GNA quantum in MW, for all such entities located in the State considered for billing, for the corresponding billing period.)</p>	<p>The charges incurred in development of the ISTS system will be recovered from the Drawee DICs on monthly basis in accordance with these regulations. As the T-GAN will be granted on the existing margins available in the ISTS network, charges for it should be equivalent to the GNA charges.</p> <p>We would also like to draw your attention to following conditions under which corridor booking only under T-GNA makes commercial sense:</p> <ol style="list-style-type: none"> 1. Storage technology will be playing an important role in supply shifting and ancillary services market. The quantum of power to be stored in battery will be highly dependent on availability of natural resource and demand

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				<p>supply situations, ascertaining which on long term horizons is highly inaccurate and require real time interventions.</p> <p>2. Considerable power demand of States is variable in nature and highly dependent upon seasonal variation, industrial cycles etc. Due to which the states will be forced to buy power under short-term contract contracts.</p> <p>Charging 10% more on T-GNA will inflate the costs under the above situations. We request you to continue with the earlier regime and keep the charges for T-GNA and GNA same.</p>
6	12(2)	Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for	Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the	We agree to the fact that transmission deviations rate need to kept at value higher

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		<p>a time block during a billing month shall be computed as under:</p> <p>1.35 X (transmission charges for GNA of entities located in the State, under first bill for the billing month in Rs.)/ (GNA quantum in MW of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)</p>	<p>State, for a time block during a billing month shall be computed as under:</p> <p>1.051 1.35 X (transmission charges for GNA of entities located in the State, under first bill for the billing month in Rs.)/ (GNA quantum in MW of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)</p>	<p>than normal transmission charges to ensure seriousness while obtaining GNA. SOR issued with the ISTS charges sharing regulations mentioned following for higher rate of transmission deviations charges:</p> <p>“an entity which has not obtained adequate LTA or MTOA and uses the system over and above its LTA or MTOA, does not pay for such system on a regular basis, while other DICs bear charges for such system. Hence, charges for utilising the system over and above LTA+MTOA has been kept marginally higher.”</p> <p>Introduction of GNA has not changed the methodology of calculation of transmission charges, construct for calculation for transmission charges is still same.</p> <p>In view of above we request to kindly keep the earlier provision</p>
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				keeping transmission deviation charges 5% higher with normal transmission charges.
7	13(1)	<p>4. Clause (1) of Regulation 13 of the Principal Regulations shall be substituted with the provisions as under:</p> <p>“(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNA_{RE}), for scheduling power from (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources:</p> $GNA_{RE} \text{ (in MW)} = GNA \times \frac{\sum_{n=1}^T \left(\frac{SDR_G}{SDT_G} \right)}{T}$ <p>Where</p> <ul style="list-style-type: none"> • SDR_G is drawl schedule (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block. • SDT_G is total drawl schedule(in MW) under GNA through ISTS from all sources in nth block. • ‘n’ is the nth time block • T is number of time blocks in a month = 96X number of days in a month 	<p>4. Clause (1) of Regulation 13 of the Principal Regulations shall be substituted with the provisions as under:</p> <p>“(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNA_{RE}), for scheduling power from (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources:</p> <p>$GNA_{RE} \text{ (in MW)} = GNA \times (\text{Monthly avg } ADR_G) / (\text{Monthly avg } ADT_G)$</p> <p>Where</p> <ul style="list-style-type: none"> • SDR_G is the average of daily maximum actual schedule drawl (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in the nth block • SDT_G is the average of daily maximum actual total actual drawl schedule(in MW) under GNA through ISTS from all sources in nth block of the day. • ‘n’ is the nth time block 	<p>1. “Renewable Hybrid Generating Station” or “RHGS” is defined in CGNA Regulation 2022 as a generating station based on hybrid of two or more renewable source(s) of energy with or without Energy Storage System, connected at the same inter-connection point”. Whereas, the waiver is allowed to renewable hybrid generating station with a combination of wind and Solar only, and not other renewable sources (PSS, SHP etc).</p> <p>In view of the above, ISTS charge waiver may be extended to RHGS as defined above</p> <p>2. Linking GNA_{RE} with daily maximum average drawl would be an optimum solution as RE is</p>

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		<p>Provided that in case total drawl schedule (in MW) under GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule corresponding to GNA, the “SDTG” shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p>	<p>• T is number of time blocks in a month = 96X number of days in a month</p> <p>Provided that in case total actual drawl schedule (in MW) under GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule corresponding to GNA, the “SDTG” shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p>	<p>not available throughout the day. It also suggested that actual drawl to be taken instead of scheduled drawl to improve the accuracy. Further, Proposed GNA for the States under GNA Regulation is derived from day-wise actual peak drawl hence it is requested that a similar methodology may be adopted for the calculation of GNA_{RE} also.</p>
8	13(3)	<p>Where COD of a Connectivity Grantee is delayed from start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity, the Connectivity Grantee shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to Connectivity capacity, which have not achieved COD:</p>	<p>Where COD of a Connectivity Grantee is delayed from start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity, the Connectivity Grantee shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to Connectivity capacity, which have not achieved COD:</p> <p><i>Provided that where the COD of the Connectivity Grantee is extended by the competent authority, the start date of Connectivity in terms of the GNA Regulations would be aligned to and commence from the extended COD of the</i></p>	<p>Ministry of Power’s has vide its direction (dated 15th January 2021) issued under Section 107 of EA’2003 has stated as follows:</p> <p><i>“Provided also that where a Renewable Energy generation capacity which is eligible for ISTS waiver in terms of the extant orders, is granted extension in COD by the competent authority, the commencement and the period of LTA shall also get extended accordingly, and it will be deemed that the period of ISTS waiver is extended by the said period.”</i></p>

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			Connectivity Grantee. The Connectivity Grantee shall pay the Yearly Transmission Charges for the Associated Transmission System corresponding to Connectivity capacity, which has not achieved the extended COD.	It is suggested that the start date of connectivity be extended and aligned with the extended SCOD of the RE project and transmission charges levied only if the commissioning of the RE project is delayed beyond the extended SCOD.
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Clarification required

S.No.	Reference Clause	Proposed Clause	Clarification required
1	12(1)(a)	For a generating station, net metered ex-bus injection, in a time block in excess of GNA: Provided that for a hydro-generating station, schedules for overload capacity of 10% during peak season shall not be charged under transmission deviation	<p>We understand that post GNA, only drawee entity can apply for GNA. Hence generators will not have any GNA (their connectivity will be their deemed GNA)</p> <p>Clarity is required how Transmission Deviation should be calculated in case of generators. We assume that ideally there should not be any such charges for generators.</p>

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