

**D B Power Limited comments/ suggestions/ objections on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022.**

S. No.	Regulation	As per draft GNA	Comments and Suggestions
1	3 (1)	<p><i>The transmission charges shall be shared amongst the DICs on monthly basis based on the Yearly Transmission Charges such that:-</i></p> <p>(a) <i>The Yearly Transmission Charges are fully recovered; and</i></p> <p>(b) <i>Any adjustment on account of revision of the Yearly Transmission Charges are recovered.</i></p>	<p>Our understanding from the Regulation 40 of GNA regulation and the proposed amendments of sharing regulation is that no transmission charges shall payable by injecting entity other than one-time GNA.</p> <p>Basis to our understanding, it is requested to suitably modify the clause as:a</p> <p>The transmission charges shall be shared amongst the <b>drawee</b> DICs on monthly basis based on the Yearly Transmission Charges such that:-</p> <p>(a) The Yearly Transmission Charges are fully recovered; and</p> <p>(b) Any adjustment on account of revision of the Yearly Transmission Charges are recovered.</p>
2	2 (1) (dd)	<p><b>Deleted regulation 2 (1) (dd) i.e. definition of Untied LTA</b></p> <p><del><i>‘Untied LTA’ means the quantum of Long-Term Access granted to a DIC less the quantum for which buyers have been identified under Long-Term Access or Medium-Term Open Access or both;</i></del></p>	<p>From the proposed amendments and Regulation 40 of GNA Regulation 2022, we understand that after implementation of GNA, injecting entity having operational untied LTA shall be deemed converted in to GNA after submission of requisite Bank Guarantee.</p>
	5 (4)	<p><del><i>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.</i></del></p> <p><i>The Yearly Transmission Charges for the National Component shall be shared by all the drawee DICs in proportion to their quantum of GNA.”</i></p>	<p>For example-</p> <p>DBPL has operational LTOA of 705 MW and the treatment of said LTOA under GNA shall be as below:</p> <p>(i) GNA equivalent to 705 MW LTOA (519 MW LTOA of identified buyer + 186 MW LTOA of unidentified buyer) shall be deemed grated to DBPL.</p>
	6 (2)	<p><del><i>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.</i></del></p> <p><i>Yearly Transmission Charges covered under sub-clause (a) of Clause (1) of this Regulation shall be shared by drawee DICs of the receiving region in proportion to their quantum of GNA.”</i></p>	<p>(ii) DBPL has to submit Conn BG-3 against 705 MW which will be returned to DBPL into five equal parts over the period of five year.</p> <p>(iii) DBPL has to pay one-time GNA charges @ Rs.1 Lakh/MW for 705 MW.</p>

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S. No.	Regulation	As per draft GNA	Comments and Suggestions
	6 (3)	<del>Yearly Transmission Charges covered under sub-clause (b) of Clause (1) of this Regulation shall be shared by drawee DICs of the region and injecting DICs (with untied LTA) of the same region, in proportion to their quantum of Long Term Access plus Medium Term Open Access and untied LTA, respectively.</del>  Yearly Transmission Charges covered under sub-clause (b) of Clause (1) of this Regulation shall be shared by drawee DICs of the region in proportion to their quantum of GNA.”	(iv) LC submitted by DBPL to CTUIL in lieu of 186 MW LTOA shall be returned by CTUIL to DBPL.  (v) DBPL is no longer liable to pay transmission charges, any other charges pertaining to 186 MW LTOA to CTUIL.  Injecting entity having operational un-tied LTA having no clarity on how such LTA will be treated after implementation of GNA.
	11 (4) and 11 (5)	<del>4) Transmission charges for Short Term Open Access, paid by a DIC with untied LTA shall be offset against the transmission charges payable by the said DIC for untied LTA in the following billing month.</del>  <del>(5) No transmission charges for Short Term Open Access for inter-State transmission system, shall be payable by a distribution licensee which has Long Term Access or Medium Term Open Access or both, or by a trading licensee acting on behalf of such distribution licensee:</del>  <del>Provided that other charges or fees as per Open Access Regulations, 2008 and the Transmission Deviation charges, if any, as per these regulations shall be payable.</del>	It is requested to incorporate suitable clarity on treatment of un-tied LTA i.e. liability of transmission charges any other charges after implementation of GNA.
	14 (1)	The Implementing Agency shall publish transmission charges payable by drawee DICs <u>and injecting DICs with untied LTA</u> for the billing month in Rupee terms.	