

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

SR.NO	Clause no. of Principal Regulation	Proposed Amendment in Draft regulation	Proposed change
1.	<p align="center">Transmission Deviation</p> <p align="center">12(2)</p>	<p>Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for 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>In the draft amendment, under the clause (1) of the Regulation 11, it is proposed that Short Term / TGNA charges is 1.10 times of transmission charge applicable to GNA, while under the clause (2) of the Regulation 12, it is proposed that the Transmission Deviation Charge by is 1.35 times of transmission charge applicable to GNA.</p>
2.	<p align="center">Transmission charges for Short Term Open Access</p> <p align="center">11(1)</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 / (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>In this regard, it is submitted that Intra-State entities or Bulk Consumers would be preferred to obtain TGNA for the shorter period and to avoid Long term payment liability of ISTS charges towards GNA, whereas State DISCOMs have committed towards Long Term ISTS / GNA charges. However, when the Intra-State entities or Bulk Consumers will be overdraw from ISTS network than approved GNA of the State, State DISCOMs being GNA customer(s) will be ending after paying Deviation Charges @ 1.35 times of GNA transmission charge on such overdraw quantum as against TGNA charges i.e. 1.10 times of GNA charges, payable / paid by Intra-State entities or Bulk Consumers. Therefore, it is requested to put TGNA & Transmission</p>

			Deviation Charges in similarity / at par to avoid any mistreatment .
3.	Transmission charges for Short Term Open Access 11(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:	The said clause is deleted in the proposed draft sharing regulation. This will lead to the increase in the transmission charges which will increase the burden on the Discoms. Hence, it is requested that no T-GNA charges should be levied on the Discoms upto the GNA quantum in line with the existing Sharing Regulation,2020.