



KERALA STATE ELECTRICITY BOARD LIMITED

Incorporated under the Companies Act, 1956

Corporate identity Number: U40100KL201 ISGC0272424

Regd Office: VydyuthiBhavanam, Pattom, Thiruvananthapuram – 695004

Office of the Deputy Chief Engineer, Tariff and Regulatory Affairs Cell

IX Floor, Phone (O) +91 471 2514617, 2514317, 2514650

E-mail: trac@kseb.in, web: www.kseb.in

KSEB/TRAC/CG/Draft Regulations/CERC Regulations/2022-23/206

6-7-2022

To

The Bench Officer,

Central Electricity Regulatory Commission,

Chanderlok Building, Janpath Marg,

New Delhi.

Sir,

Sub: Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 – Comments –reg:

Ref: Notification No. No. L-1/250/2019/CERC Dated: 11.06.2022 of CERC.

Kind attention of the Hon'ble Commission is invited to the draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022. KSEBL comments on the same are submitted below for kind consideration. It is requested that the comments may kindly be considered while issuing final regulation.

1. Regulation 10 : Sharing of Transmission Losses:

As per the draft amendment to Regulation 10 of the CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022, transmission losses are not waived for solar and wind. This is against the provisions in the policies of Ministry of Power which allowed waiver of transmission losses for solar and wind commissioned prior to 30th June 2023. (Notification of MoP 23/12/2016-R&R dated 5-8-2020).

KSEBL has already entered into contracts with solar and wind generators outside the State on the condition that transmission charges and losses will not be applicable for such purchase. Therefore, removing this clause in the draft Regulations will affect the financials of such PPAs. Therefore, **it is humbly requested that the waiver of transmission losses may be continued for solar and wind contracts who have entered PPAs prior to the notification of the Central Electricity Regulatory Commission (Sharing of**

Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022.

2. Transmission charges for T-GNA:

As per the draft Regulation, transmission charges for T-GNA for intra state entities in a State is 10% more than the transmission charges for GNA. It is not clear whether if STU is the T-GNA applicant and in such a case whether STU is liable for payment of the additional 10% transmission charges for T-GNA.

Also, if an embedded intra state entity draws power by applying for T-GNA within the GNA quantum of STU, how the transmission charges of T-GNA paid by that intra state entity is adjusted against the transmission charges payable by the STU for the State is not clear. It is requested that this aspect may be clarified in the Regulations.

3. Transmission Deviation charges:

As per the draft Regulations, the transmission deviation charges for drawal exceeding GNA+ T-GNA quantum is 35% more than the normal transmission charges. In the existing Regulations, it was only 5%. It is requested that such huge increase in transmission deviation charges may be avoided.

4. Treatment of transmission charges and losses in specific cases: Amendment to Regulation 13 of the Principal Regulations:

As per the proposed amendment, transmission charges and losses are not waived for solar and wind. This is against the provisions in the policies of Ministry of Power which allowed waiver of transmission charges and losses for solar and wind commissioned prior to 30th June 2025. (Notification of MoP 23/12/2016-R&R dated 21-6-2021).

KSEBL has already entered into contracts with solar and wind generators outside the State on the condition that transmission charges and losses will not be applicable for such purchase. Therefore, removing this clause in the draft Regulations will affect the financials of such PPAs. Therefore, **it is humbly requested that the waiver of transmission losses may be continued for solar and wind contracts who have entered PPAs prior to the notification of the Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022.**

Yours faithfully,


Chief Engineer (Commercial & Tariff)