

## Annexure

### Comments, views and suggestions of TANGEDCO on the draft first amendment of Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2020

Sl.No	Regulation no	Existing Regulation	Amended Regulation	TANGEDCO's Remarks
1	<b>2.Definitions clause (1)</b>	<b>Associated Transmission System' or 'ATS'</b> means the transmission system identified for a generating station by the Central Transmission Utility in the Long Term Access grant;	<b>Substitution:</b> “(b) ‘Associated Transmission System’ or ‘ATS’ shall have the same meaning as defined in GNA Regulations;”	ATS in respect of any generation project is developed only at the behest of the generator. The ATS should comprise of all the elements of the transmission system which are necessitated on account of the connectivity requested by the generator. The existing definition is clear and unambiguous. The immediate evacuation along with the network expansion system shall be treated as the ATS instead of considering only the transmission elements required for immediate evacuation. Hence, necessary amendment may be issued in GNA Regulation also.
			Sub-clause (h) of Clause (1) of Regulation 2 of the Principal Regulations shall be substituted as under: “(h) ‘Drawee DIC’ shall mean the DICs which draw power through ISTS but does not include ESS”	If the ESS is not treated as Drawee entity, then how the energy drawn by the ESS will be accounted? This will result in undue favour to the ESS developer at the cost of the Discoms. MoP vide

				notification No. 23/16/2020-R&R Part (1) dated 10.03.2022 has notified Guidelines for Procurement and Utilization of Battery Energy Storage Systems as part of Generation, Transmission and Distribution assets, along with Ancillary Services. There is a need to clarify on the treatment of ESS. Hence, it is requested that a detailed explanatory memorandum may be issued in this regard.
		<p><b>p) 'Open Access Regulations, 2008'</b> means the Central Electricity Regulatory Commission (Open Access in inter-State Transmission) Regulations, 2008 and any subsequent amendments or re-enactments thereof;</p> <p><b>s) 'Power Supply Regulations, 2010'</b> means the Central Electricity Regulatory Commission (Regulation of Power Supply) Regulations, 2010 as amended from time to time and any re-enactment thereof;</p> <p><b>y) 'Target Region'</b> means the region to which Long Term Access is granted to a DIC, without identified beneficiaries in the said region;</p> <p><b>dd) 'Untied LTA'</b> 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;</p>	Shall be deleted.	<p>----</p> <p>----</p> <p>----</p> <p>----</p>

2	<b>3. Principles of sharing transmission charges</b>	(1) The transmission charges shall be shared amongst the DICs on monthly basis based on the Yearly Transmission Charges such that	(1) The transmission charges shall be shared <del>amongst the DICs</del> on monthly basis based on the Yearly Transmission Charges such that	---
		(2) Yearly Transmission Charges for transmission system shall be shared on monthly basis by DICs in accordance with Regulations 5 to 8 of these regulations subject to the exceptions provided in Clauses (3), (6), (9) and (12) of Regulation 13 of these regulations.	(2) Yearly Transmission Charges for transmission system shall be shared on monthly basis by <u>drawee</u> DICs in accordance with Regulations 5 to 8 of these regulations subject to the exceptions provided in Clauses (3), (6), (9) and (12) of Regulation 13 of these regulations.	---
		(3) Long Term Access or Medium Term Open Access for projects covered under Clause (1) of Regulation 13 shall not be considered for apportionment of Yearly Transmission Charges under Regulations 5 to 8 of these regulations.	Substitution: “(3) Bills for transmission charges shall be raised on the buyer in terms of this clause notwithstanding any provisions in the PPA and the settlement of the transmission charges inter se between the buyer and the generating station or the seller, wherever necessary, shall be made in terms of the PPA or as per the mutual agreement.”	---
3	<b>5. Components and sharing of</b>	(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	Substitution: “(4) The Yearly Transmission Charges for the National Component shall be shared by all the drawee DICs in proportion to	---

	<b>National Component (NC)</b>	and untied LTA respectively.	their quantum of GNA.”	
4	<b>6. Components and sharing of Regional Component (RC) Clause (2)</b>	(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.	Substitution: “(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 in proportion to their quantum of GNA.”	What is the treatment for Injecting DICs (Generators) with untied quantum of power as per their Connectivity capacity? The provision for fixing liability to the Connectivity Grantee under Regulation 13(3) shall be included in Clause (2) of Regulation 6 also.
	<b>Clause (3)</b>	(3) 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.	Substitution: “(3) 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.”	What is the treatment for Injecting DICs (Generators) with untied quantum of power as per their Connectivity capacity? The provision for fixing liability to the Connectivity Grantee under Regulation 13(3) shall be included in Clause (3) of Regulation 6 also.
4	<b>7. Components and sharing of Transformer Component (TC)</b>	(1) Transformer Component for a State shall comprise of Yearly Transmission Charges for inter-connecting transformers (ICTs) 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.	(1) Transformer Component for a State shall comprise of Yearly Transmission Charges for inter-connecting transformers (ICTs) <u>along with their associated bays and downstream bays</u> 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.	
		(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.	(2) Transformer Component for a State shall be borne and shared by the drawee DICs located in the concerned State in proportion to their <del>Long Term Access plus Medium Term Open Access</del> <u>GNA</u> .	---
5	<b>8. Components and sharing of AC System Component (ACC)</b>	(3) The Yearly Transmission Charges of AC-UBC shall be shared by drawee DICs and injecting DICs with untied LTA corresponding to their respective usage of the transmission lines, in accordance with Regulation 9 of these regulations.	(3) The Yearly Transmission Charges of AC-UBC shall be shared by drawee DICs <del>and injecting DICs with untied LTA</del> corresponding to their respective usage of the transmission lines, in accordance with Regulation 9 of these regulations.	What is the treatment for Injecting DICs (Generators) with untied quantum of power as per their Connectivity capacity? The provision for fixing liability to the Connectivity Grantee under Regulation 13(3) shall be included in Clause (3) of Regulation 8 also.
		(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.	<b>Substitution:</b> “(5) Transmission charges under AC-BC shall be shared by all drawee DICs in proportion to their quantum of GNA.”	What is the treatment for Injecting DICs (Generators) with untied quantum of power as per their Connectivity capacity? The provision for fixing liability to the Connectivity Grantee under Regulation 13(3) shall be included in Clause (5) of Regulation 8 also.
6	<b>9. Computation of share of transmis</b>	(7) Transmission charges at each drawal node and each injection node with untied LTA shall be calculated as per Hybrid Methodology, using transmission line-wise usage-based	(7) Transmission charges at each drawal node <del>and each injection node with untied LTA</del> shall be calculated as per Hybrid	What is the treatment for Injecting DICs (Generators) with untied quantum of power as per their Connectivity capacity? The provision for

sion charges under AC-UBC	transmission charges obtained in accordance with Clause (6) of this Regulation.	Methodology, using transmission line-wise usage-based transmission charges obtained in accordance with Clause (6) of this Regulation.	fixing liability to the Connectivity Grantee under Regulation 13(3) shall be included in Clause (7) of Regulation 9 also.
	<p>(8) The Implementing Agency shall aggregate the transmission charges as obtained in accordance with Clause (7) of this Regulation at drawal nodes within the geographical boundary of the State to determine the transmission charges for the State under AC-UBC:</p> <p>Provided that drawee DICs other than the distribution licensees of the State, who have taken Long Term Access or Medium Term Open Access shall be apportioned the transmission charges under AC-UBC as per the transmission charges obtained at their drawl node(s) in accordance with Clause (7) of this Regulation and such transmission charges shall not be included in the aggregate transmission charges of the State.</p>	<p>(8) The Implementing Agency shall aggregate the transmission charges as obtained in accordance with Clause (7) of this Regulation at drawal nodes within the geographical boundary of the State to determine the transmission charges for the State under AC-UBC:</p> <p>Provided that drawee DICs other than the distribution licensees of the State, who <u>obtained GNA</u> shall be apportioned the transmission charges under AC-UBC as per the transmission charges obtained at their drawl node(s) in accordance with Clause (7) of this Regulation and such transmission charges shall not be included in the aggregate transmission charges of the State.</p>	---
	(9) Injecting DICs with untied LTA shall be apportioned transmission charges under AC-UBC as per the transmission charges obtained at their injection node in accordance with Clause (7) of this Regulation.	Deleted	What is the treatment for Injecting DICs (Generators) with untied quantum of power as per their Connectivity capacity? The provision for fixing liability to the



				Connectivity Grantee under Regulation 13(3) shall be included in Clause (9) of Regulation 9 also.
7	10. Sharing of Transmission Losses	<p>'Ir' denotes sum of injection into the ISTS at regional nodes less injection from projects covered under Clause (1) of Regulation 13 of these regulations for the week.</p> <p>(2) Drawal schedule of DICs shall be prepared as per provisions of the Grid Code taking into account the transmission losses of the week preceding the last week as calculated in accordance with Clause (1) of this Regulation: Provided that while preparing drawal schedule of DICs in respect of projects covered under Clause (1) of Regulation 13, transmission losses shall be considered as zero.</p>	<p><b>Substitution:</b> "Ir' denotes sum of injection into the ISTS at regional nodes".</p> <p>(2) Drawal schedule of DICs shall be prepared as per provisions of the Grid Code taking into account the transmission losses of the week preceding the last week as calculated in accordance with Clause (1) of this Regulation: <del>Provided that while preparing drawal schedule of DICs in respect of projects covered under Clause (1) of Regulation 13, transmission losses shall be considered as zero.</del></p>	<p>---</p> <p>---</p>
8	11. Transmission charges for Short Term Open Access Substitu	<p>(1) Short Term Open Access Rate (in paise/kWh) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under: Transmission charges of the State for the billing month (in rupees) / (7200 X the quantum, in MW, of Long Term Access plus Medium Term Open Access of the State for the corresponding billing period)</p>	<p>Substitution: "(1) 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: 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</p>	---

<p>ted as <u>Transmi</u> <u>ssion</u> <u>charges</u> <u>for T-</u> <u>GNA</u></p>		MW, for all such entities located in the State considered for billing, for the corresponding billing period.)”	
	(2) Transmission charges for Short Term Open Access shall be payable by generating stations and embedded entities located in the State, as per the last published Short Term Open Access Rate for the State, along with other charges or fees as per Open Access Regulations, 2008 and the Transmission Deviation charges, if any, as per these regulations.	<p><b>Substitution:</b></p> <p>“(2) Transmission charges for T-GNA shall be payable by drawee embedded entities located in the State, as per the last published T-GNA rate for the State, along with other charges or fees as per GNA Regulations and the Transmission Deviation charges, if any, as per these regulations.”</p>	---
	(3) Transmission charges for Short Term Open Access paid by an embedded intra-State entity during a month shall be reimbursed in the following billing month to the State in which such entity is located.	(3) Transmission charges for <del>Short Term Open Access</del> <u>T-GNA</u> paid by an embedded intra-State entity during a month shall be reimbursed in the following billing month to the State in which such entity is located.	---
	<p>(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.</p> <p>(5) No transmission charges for Short Term Open Access for inter-State transmission</p>	Deleted	---



		<p>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:</p> <p>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.</p>		
		<p>(6) Transmission charges for Short Term Open Access collected in a billing month, after adjustment as per Clauses (3) and (4) of this Regulation, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.</p>	<p><b>Substitution:</b></p> <p>“(6) Transmission charges for T-GNA collected in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.”</p>	---
9	<b>12. Transmission Deviation</b>	<p>Clause 1</p> <p>(a) For a generating station, net metered ex-bus injection, in a time block in excess of the sum of Long Term Access, Medium Term Open Access and Short Term Open Access:</p> <p>Provided that for a hydro-generating station, overload capacity of 10% during peak season shall be taken into account.</p> <p>(b) For a State net metered ex-bus injection or net metered drawal, in a time block, in excess of the sum of Long Term Access and Medium Term Open Access.</p> <p>(c) For any drawee DIC, which is a regional entity other than distribution licensees, net metered drawal in a time block in excess of the</p>	<p><b>Substitution:</b></p> <p>“(a) For a generating station, net metered ex-bus injection, in a time block in excess of GNA:</p> <p>Provided that for a hydro-generating station, schedules for overload capacity of 10% during peak season shall not be charged under transmission deviation.</p> <p>(b) For a State net metered injection or net metered drawal, in a time block, in excess of the sum of GNA and T-GNA for the State including all drawee intra-state entities.</p> <p>(c) For any drawee DIC, other than those covered under clause (b) of</p>	---

		sum of Long Term Access, Medium Term Open Access and Short Term Open Access.	<p>this Regulation, net metered drawal in a time block in excess of the sum of GNA and T-GNA:</p> <p>Provided that if a generating station including REGS having GNA, draws through ISTS under T-GNA, the net metered drawal of such generating station in a time block in excess of T-GNA shall be considered as transmission deviation.”</p>	
		<p>(2) 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>1.05 X (transmission charges of the State for the billing month in Rs.)/ (quantum in MW of Long Term Access plus Medium Term Open Access of the State for the corresponding billing period X 2880)</p>	<p>Substitution:</p> <p>“(2) 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>(3) The Transmission Deviation charges shall be recovered through the third bill and shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.</p>	<p>(3) The Transmission Deviation charges shall be recovered through the third bill and shall be reimbursed to the <u>drawee</u> DICs in proportion to their share in the first bill in the following billing month.</p>	---

10	<p><b>13. Treatment of transmission charges and losses in specific cases</b></p>	<p>(1) No transmission charges and losses for the use of ISTS shall be payable for:</p> <p>(a) generation based on solar power resource for the useful life of the projects commissioned during the period from 1.7.2011 to 30.6.2017.</p> <p>(b) generation based on solar or wind power resources for a period of 25 years from the date of commercial operation, fulfilling the following conditions:</p> <p>(i) Such generation capacity has been awarded through competitive bidding; and</p> <p>(ii) Such generation capacity has been declared under commercial operation during the period from 1.7.2017 to 12.2.2018 for solar based resources or during the period from 30.9.2016 to 12.2.2018 for wind based resources; and</p> <p>(iii) Power Purchase Agreement(s) have been executed for sale of power from such generation capacity to the Distribution Companies for compliance of their renewable purchase obligation.</p> <p>(c) generation based on solar or wind power resources , for a period of 25 years from the date of commercial operation, fulfilling the following conditions:</p> <p>(i) Such generation capacity has been awarded through competitive bidding process in accordance with the guidelines issued by the Central Government; and</p> <p>(ii) Such generation capacity has been declared under commercial operation during the period</p>	Deleted	---
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	<p>from 13.2.2018 to 31.12.2022; and</p> <p>(iii) Power Purchase Agreement(s) have been executed for sale of such generation capacity to all entities including Distribution Companies for compliance of their renewable purchase obligations.</p> <p>(2) Where a generating station or any other seller has been granted Long Term Access or Medium Term Open Access and has entered into Power Purchase Agreement(s) for supply of power under such Long Term Access or Medium Term Open Access, the transmission charges towards such Long Term Access or Medium Term Open Access for components identified under Regulations 5 to 8 of these regulations shall be determined at the drawal nodes, and billed to the buyer(s) after COD of generating station or unit(s) thereof:</p> <p>Provided that where the generating station or any other seller is responsible to pay the transmission charges in terms of the Power Purchase Agreements, bills for transmission charges shall be raised on the buyer in terms of this clause notwithstanding the provision in the PPA and settlement of the transmission charges <i>inter se</i> between the buyer and the generating station or the seller shall be made in terms of the PPA or as may be mutually agreed.</p>		
	<p>(3) Where COD of a generating station or unit(s) thereof is delayed and the Associated</p>	<p><b>Substitution:</b></p> <p>“(3) Where COD of a Connectivity grantee is delayed from start date of</p>	<p>As per Regulation 2(1)(b) of SR 2020, the Associated Transmission System is</p>

	<p>Transmission System has achieved COD, which is not earlier than its SCOD, the generating station shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to Long Term Access granted for the generating station or unit(s) thereof, which have not achieved COD:</p> <p>Provided that Yearly Transmission Charges in respect of Associated Transmission System shall be included for determination of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations upon the generating station or unit(s) thereof achieving COD.</p>	<p>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 <b>Associated Transmission System</b> corresponding to Connectivity capacity which have not achieved COD:</p> <p>Provided that Yearly Transmission Charges in respect of Associated Transmission System corresponding to the Connectivity capacity which have achieved COD shall be included for determination of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations."</p>	<p>defined as ATS means the transmission system identified for a generating Station by the Central Transmission Utility in the Long Term Access grant. Whereas in the draft GNA Regulations, the ATS is defined as</p> <p><i>"Any augmentation required, excluding terminal bay(s), to the existing ISTS identified under Regulation 6.1 of these regulations, shall be considered as the Associated Transmission System (ATS) for the Applicant(s)."</i></p> <p>However, the same is modified in the final notified GNA Regulations as</p> <p><i>"Of the augmentation requirement as identified under Regulation 6.1 of these regulations, <b>augmentation required for immediate evacuation of power of the Applicant (s),</b> excluding terminal bay(s), shall be considered as the Associated Transmission System (ATS) for the Applicant(s)."</i></p> <p>This is totally in contrary to</p>
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				<p>the fundamental planning philosophy. There is no justification for modifying the definition proposed in the draft Regulations which was in line with the existing provisions under various Regulations. This is clearly intended to safeguard the interest of the generators that are defaulting the provisions under the connectivity contract.</p> <p>The very purpose of the having indemnity through the Conn BG-2 will be defeated by the new definition for ATS. The defaulting Connectivity grantee will be let off scot free and the entire tariff burden will be imposed on the existing GNA holders.</p> <p>Hence, in order to safeguard the fundamental principles of Planning process and safe guard the legitimate interest of the Discoms and ultimately end consumers, the existing definition for ATS under Sharing Regulations should be retained. Accordingly, the erroneous modification of definition for ATS in GNA</p>
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			Regulations shall be amended.
	<p>(4) Where only some of the transmission elements of the Associated Transmission System have achieved COD before the COD of the Associated Transmission System and the generating station seeks part operationalisation of Long Term Access, the Central Transmission Utility shall part operationalize Long Term Access, subject to availability of transmission system and Yearly Transmission Charges in respect of such transmission elements of the Associated Transmission System shall be included for determination of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations.</p>	<p>Substitution:  “(4) Where only some of the transmission elements of the Associated Transmission System have achieved COD before the COD of the Associated Transmission System and the Connectivity grantee seeks part effectiveness of its Connectivity as per Clause (a) of Regulation 22.4 of GNA Regulations, Yearly Transmission Charges in respect of such transmission elements of the Associated Transmission System shall be included for determination of transmission charges of DICs in accordance with Regulations 5 to 8 of these regulations.</p>	---
	<p>(6) If any transmission element(s) of the Associated Transmission System is required by the generating station prior to COD of the Associated Transmission System, the Yearly Transmission Charges for such transmission element(s) shall be payable by the generating station from the COD of the said transmission element(s) of the Associated Transmission System till the generating station achieves COD.</p>	<p>(6) If any transmission element(s) of the Associated Transmission System is required by the <del>generating station</del> <u>Connectivity grantee</u> prior to COD of the Associated Transmission System, the Yearly Transmission Charges for such transmission element(s) shall be payable by the <del>generating station</del> <u>Connectivity grantee</u> from the COD of the said transmission element(s) of the Associated Transmission System till the</p>	---

		generating station <u>Connectivity grantee</u> achieves COD.	
	<p>(7) Where Long Term Access is granted to a generating station on existing margins and COD of the generating station or unit(s) thereof is delayed, the generating station shall, corresponding to the capacity that is delayed, pay transmission charges at the rate of 10% of transmission charge per MW for the State where such generating station is located:</p> <p>Provided that the amount so received in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.</p>	<p><b>Substitution:</b>  “(7) Where Connectivity is granted to a Connectivity grantee on existing margins and COD of such Grantee is delayed, the Connectivity grantee shall, corresponding to the capacity that is delayed, pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000 /MW/month:  Provided that the amount so received in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.”</p>	---
	<p>(8) In case a generating station or unit(s) thereof has achieved COD and the Associated Transmission System is delayed, the concerned inter-State transmission licensee(s) shall make alternate arrangement at its own cost for despatch of power of the generating station or unit(s) thereof in consultation with the Central Transmission Utility:  Provided that till such alternate arrangement is made, the inter-State transmission licensee(s) shall pay to the generating station, the Yearly Transmission Charge corresponding to the</p>	<p>(8) In case a generating station or unit(s) thereof has achieved COD and the Associated Transmission System is delayed, the concerned inter-State transmission licensee(s) shall make alternate arrangement at its own cost for despatch of power of the generating station or unit(s) thereof in consultation with the Central Transmission Utility:  Provided that till such alternate arrangement is made, the inter-</p>	---

	<p>quantum of Long Term Access for the period for which the transmission system has got delayed.</p>	<p>State transmission licensee(s) shall pay to the generating station, the Yearly Transmission Charge corresponding to the quantum of Long Term Access <u>Connectivity</u> for the period for which the transmission system has got delayed.</p>	
	<p>(9) Where a dedicated transmission line has already been constructed or is under construction by an inter-State transmission licensee under coordinated transmission planning of the Central Transmission Utility, the Yearly Transmission Charges for such dedicated transmission line shall be payable by the concerned generating station to the inter-State transmission licensee (including deemed inter-State transmission licensee) from the COD of the dedicated transmission line till operationalization of Long Term Access of the generating station. After operationalization of Long Term Access, Yearly Transmission Charge for the dedicated transmission line proportionate to the quantum of Long Term Access operationalized qua the quantum of Connectivity for the dedicated transmission line shall be considered in accordance with Regulations 5 to 8 of these regulations and the balance transmission charges shall continue to be paid by the generating station.</p>	<p><b>Substitution:</b>  “(9) Where a dedicated transmission line has already been constructed or is under construction by an inter-State transmission licensee under coordinated transmission planning of the Central Transmission Utility, the Yearly Transmission Charges for such dedicated transmission line shall be payable by the concerned generating station to the inter-State transmission licensee (including deemed inter-State transmission licensee) from the COD of the dedicated transmission line till COD of such generating station after which Yearly Transmission Charge for the dedicated transmission line shall be considered in accordance with Regulations 5 to 8 of these regulations.”</p>	---

		<p>(10) Generating stations drawing start-up power from ISTS shall pay transmission charges at the rate of Transmission Deviation Rate for the State in which they are located: Provided that the amount so received in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.</p>	<p><b>Substitution:</b>  “(10) Regional entity Generating stations (a) drawing start-up power or (b) drawing power during shutdown after COD or (c) for REGS drawing power during non-generation hours or (d) injecting infirm power, through ISTS, shall pay transmission charges for injection or drawl beyond its T-GNA , at the rate of Transmission Deviation Rate for the State in which they are located: Provided that the amount so received in a billing month, shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.</p>	
		<p>(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.</p>	<p>Deleted</p>	<p>As per the existing provisions of the GNA Regulations and Grid Code Regulations, the ISGS can have both Inter-State Connectivity and Intra-State Connectivity. The drawl nodes of Drawee having Intra-State connectivity to ISGS were considered as deemed ISTS drawl nodes for the purpose of calculation of ISTS</p>

				<p>charges. In order to avoid the ambiguity, Hon'ble Commission had introduced this provision under the Sharing Regulation 2020. <u>Further state Transcos have invested huge capital in creating intra state network facilities, the cost of which is shared by the Discoms. If the same is not excluded in the calculating the GNA quantum it will be additional financial commitment to Discoms.</u> Removal of this clause will create unnecessary confusion leading to litigations in allocation of transmission charges. Hence, it is requested that this clause may be retained.</p>
		<p>(12) In case of a transmission system where COD has been approved in terms of proviso (ii) of Clause (3) of Regulation 4 of the Tariff Regulations, 2014 or Clause (2) of Regulation 5 of the Tariff Regulations, 2019 or where deemed COD has been declared in terms of Transmission Service Agreement under Tariff based Competitive Bidding, the Yearly Transmission Charges for the transmission system shall be: (a) paid by the inter-State transmission licensee</p>	<p>(12) In case of a transmission system where COD has been approved in terms of proviso (ii) of Clause (3) of Regulation 4 of the Tariff Regulations, 2014 or Clause (2) of Regulation 5 of the Tariff Regulations, 2019 or where deemed COD has been declared in terms of Transmission Service Agreement under Tariff based Competitive Bidding, the Yearly Transmission</p>	---

		<p>whose transmission system is delayed till its transmission system achieves COD, or</p> <p>(b) paid by the generating company whose generating station or unit(s) thereof is delayed, till the generating station or unit thereof, achieves COD, or</p> <p>(c) shared in the manner as decided by the Commission on case to case basis, where more than one inter-State transmission licensee is involved or both transmission system and generating station are delayed.</p>	<p>Charges for the transmission system shall be:</p> <p>(a) paid by the <del>inter-State</del> transmission licensee whose transmission system is delayed till its transmission system achieves COD, or</p> <p>(b) paid by the generating company whose generating station or unit(s) thereof is delayed, till the generating station or unit thereof, achieves COD, or</p> <p>(c) shared in the manner as decided by the Commission on case to case basis, where more than one <del>inter-State</del> transmission licensee is involved or both transmission system and generating station are delayed.</p>	
11	<b>14. Accounting</b>	(1) The Implementing Agency shall publish transmission charges payable by drawee DICs and injecting DICs with untied LTA for the billing month in Rupee terms.	(1) The Implementing Agency shall publish transmission charges payable by drawee DICs and <del>injecting DICs with untied LTA</del> for the billing month in Rupee terms.	---
12	<b>15. Billing.</b>	<p>Clause 2:</p> <p>(b) The second bill shall be raised in the months of April, July, October and January every year for the quarter ending on 31st</p>	<p>(b) The second bill shall be raised in the months of <del>April, July, October and January</del> <u>June</u>.</p>	---



		March, 30th June, 30th September and 31st December respectively to adjust variations on account of any revision in transmission charges allowed by the Commission, including incentives as applicable:	<u>September, December and March</u> every year for the quarter ending on 31st March, 30th June, 30th September and 31st December respectively to adjust variations on account of any revision in transmission charges allowed by the Commission, including incentives as applicable:	
13	<b>19. Letter of Credit and other instrum ents of Payment Security Mechani sm</b>	(1) The Central Transmission Utility shall, at least 3 (three) months prior to the date of operationalization of Long Term Access or Medium Term Open Access, in respect of a DIC, give a notice to such DIC, indicating the date of operationalization of such Long Term Access or Medium Term Open Access and requiring the DIC to furnish an irrevocable, unconditional and revolving Letter of Credit through a scheduled bank or any other acceptable instrument of payment security mechanism in favour of the Central Transmission Utility. Not later than 1 (one) month prior to the date of operationalization of Long Term Access or Medium Term Open Access, the DIC shall open such Letter of Credit or provide such acceptable instrument of payment security mechanism that shall be operative from a date prior to the Due Date of its first bill.	(1) The Central Transmission Utility shall, at least 3 (three) months prior to the date of operationalization of Long Term Access or Medium Term Open Access, in respect of a DIC, give a notice to such DIC, indicating the <del>date of operationalization of such Long Term Access or Medium Term Open Access</del> <u>effective date of GNA</u> and requiring the DIC to furnish an irrevocable, unconditional and revolving Letter of Credit through a scheduled bank or any other acceptable instrument of payment security mechanism in favour of the Central Transmission Utility. Not later than 1 (one) month prior to the <del>date of operationalization of Long Term Access or Medium Term Open Access</del> <u>effective date of GNA</u> , the	---

			DIC shall open such Letter of Credit or provide such acceptable instrument of payment security mechanism that shall be operative from a date prior to the Due Date of its first bill.	
		(7) In case of failure on the part of any DIC to maintain the Letter of Credit or such other instrument of payment security mechanism for the required amount in accordance with Clause (2) of this Regulation or replenish the Letter of Credit or such other instrument of payment security mechanism in accordance with Clauses (3) and Clause (5) of this Regulation and renew the Letter of Credit or such other instrument of payment security mechanism in accordance with Clause (6) of this Regulation, CTU may regulate the power injection of or supply to the concerned DIC, as the case may be in accordance with the Power Supply Regulations, 2010.	Deleted	---
14	<b>21. Consequences of non-payment of dues by a DIC</b>	Failure on the part of a DIC to make payment, in full, against the bills by the due date under these regulations shall make such DIC liable for action for any or combination of the following, by the Central Transmission Utility, on behalf of inter-State transmission 28  licensee(s): (a) regulation of power supply in accordance	Deleted	---

		<p>with the Power Supply Regulations 2010;</p> <p>(b) denial of Short term Open Access by RLDC or NLDC in accordance with the Open Access Regulations, 2008;</p> <p>(c) suspension or termination of Long Term Access or Medium Term Open Access in accordance with Connectivity Regulations, 2009.</p>		
15	<b>23. Procedures to be framed under these Regulations</b>		<p><b>Addition of clause 4:</b></p> <p>“(4) The Implementing Agency shall, within 45 (forty five) days of the notification of this amendment, publish the revised detailed procedures for implementation of the provisions of this amendment after stakeholder consultation.”</p>	---
16	<b>24. Timeline for furnishing the information</b>	<p>Clause (4) Within 7 (seven) days after end of a billing period, DICs shall submit the following to the Implementing Agency for the billing period:</p> <p>(a) MW and MVAR data for actual injection or actual drawal at various nodes or a group of nodes for peak block.</p> <p>(b) Quantum for which buyers have been identified under Long Term Access or Medium Term Open Access or both along with details of such buyers;</p>	<p>Clause (4) Within 7 (seven) days after end of a billing period, DICs shall submit the following to the Implementing Agency for the billing period:</p> <p>(a) MW and MVAR data for actual injection or actual drawal at various nodes or a group of nodes for peak block.</p> <p><del>(b) Quantum for which buyers have been identified under Long Term</del></p>	---

		(c) Any other information as required by the Implementing Agency	<del>Access or Medium Term Open Access or both along with details of such buyers;</del> (c) Any other information as required by the Implementing Agency	
17	<b>25. Information to be published by the Implementing Agency</b>	Clause 1 : (g) Details of Long Term Access and Medium Term Open Access in respect of each DIC for the billing period;	Clause 1 : (g) Details of <del>Long Term Access and Medium Term Open Access</del> <u>GNA</u> in respect of each DIC for the billing period;	---
18	<b>Annexure-1</b> Sub-clause (d) of Clause 5.16.3 & 5.16.4	(d) Modify the Marginal Flow file obtained at clause (c) above as follows (illustration is at Clause 5.16.4 of this Annexure): <input type="checkbox"/> For generating stations or sellers having no untied LTA and having identified buyers for full capacity of the generating station, reduce values of Marginal Participation Factors to zero. <input type="checkbox"/> For generating stations or sellers having no identified buyers but having untied LTA, retain values of Marginal Participation Factor as obtained at sub-clause (c) of Clause 5.16.3 above. <input type="checkbox"/> For generating stations or sellers having part untied LTA and part capacity with identified buyers: o Retain values of Marginal Participation Factor as obtained at sub-clause	<b>Substitution:</b> “(d) Modify the Marginal Flow file obtained at clause (c) above as follows: <input type="checkbox"/> <input type="checkbox"/> For generating stations reduce values of Marginal Participation Factors to zero.”	---

	<p>(c) of clause 5.16.3 above for capacity corresponding to untied LTA; and o Reduce values of Marginal Participation Factor to zero for capacity corresponding to identified buyers.</p>		
	<p>5.16.4 Following illustration is for sub-clause (d) of Clause (5.16.3) above of this Annexure:  (1) Suppose a generating station "A" (with installed capacity of 1000 MW) is located in Western Region and it has taken Long Term Access to Northern Region as target region for 300 MW and Western Region as target region for 400 MW. Untied LTA for "A", therefore, shall be 700 MW i.e. 300 MW in Northern Region and 400 MW in Western Region. Suppose, later on, "A" enters into Power Purchase Agreement with a buyer in Northern Region, say, distribution licensees of Haryana for 250 MW. Consequent upon entering into Power Purchase Agreement with Haryana, untied LTA of "A" would become 450 MW i.e. 50 MW (= 300 MW – 250 MW) in Northern Region and 400 MW in Western Region.</p>	Deleted	---

	<p>(2) If "A" has actual injection of 900 MW for the peak block of the billing period, this injection has to be segregated into injection corresponding to untied LTA and injection corresponding to Power Purchase Agreement with Haryana. This shall be done as follows: 45</p> <p>(i) Injection corresponding to untied LTA of 450 MW = <math>450 \times 900 / 700 = 578.6</math> MW; and</p> <p>(ii) Injection corresponding to identified buyer = <math>250 \times 900 / 700 = 321.4</math> MW</p> <p>(3) For the capacity under 2(i) above i.e. 450 MW, Marginal Participation Factor of "A" shall be retained as obtained at sub-clause (c) of Clause 5.16.3 of this Annexure.</p> <p>(4) For the capacity under 2(ii) above i.e. 250 MW, Marginal Participation Factor of "A" shall be considered zero.</p>		
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