

20.09.2022

To
The Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001

Subject: Comments/Suggestions on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022

Reference: Public Notice on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 dated 11.06.2022

Dear Sir,

We wish to introduce ReNew Power Private Limited ("ReNew") which is among the top and fastest growing renewable IPPs in the country. ReNew is in the business of developing wind, solar and hydro power plants and has more than 12,000 MW of operational and under construction wind, solar and hydro projects spread over multiple states.

This is in reference to the public notice issued by this Hon'ble Commission on its website inviting comments/suggestions on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022 dated 11.06.2022. Accordingly, we are hereby enclosing our comments and suggestions as '**Annexure-I**' for your reference.

We request Hon'ble Commission to kindly consider our comments/suggestions while finalizing the draft regulations.

Thanking you.

Yours Sincerely,



Authorised Signatory
ReNew Power Private Limited

ReNew Power Private Limited

(Formerly Known as ReNew Power Limited and ReNew Power Ventures Private Limited)

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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 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</p>	<p>Designated ISTS Customer' or 'DIC' means the user of any transmission element(s) of 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</p>	<p>As per the proposed amendment and the GNA 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.</p>

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		licensee that has obtained Medium Term Open Access or Long Term Access to ISTS	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.	
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 Transmission Utility to the Implementing Agency.	The list should comprise of ICTs and associated bays for determination of the transformer component.
5	11(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 MW, for all such entities located in the State	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 1.00 / (number of days in a month X 96 X GNA quantum in MW, for all such entities located	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.

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		considered for billing, for the corresponding billing period.	in the State considered for billing, for the corresponding billing period.)	<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 supply situations, ascertaining which on long term horizons is highly inaccurate and require real time interventions. 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

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				<p>under short-term contract contracts.</p> <p>Charging 10% more on T-GNA will inflate the costs under the above situations.</p> <p>We request you to continue with the earlier regime and keep the charges for T-GNA and GNA same.</p>
6	12(2)	<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>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>1.051.35 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>We agree to the fact that transmission deviations rate need to kept at value higher 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>

S.No.	Reference Clause	Proposed/Existing Clause	Recommended Clause	Rationale
				<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 keeping transmission deviation charges 5% higher with normal transmission charges.</p>
7	13 (1)	<p>No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNARE), 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"> <i>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.</i> 	<p>No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNARE), 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"> <i>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.</i> 	<p>The objective of the MoP order dated 23.11.2021 extending ISTS waiver to certain set of RE and storage projects was to facilitate increased off-take of green power by all categories of consumers. Post introduction of GNA regime, this hon'ble commission has also proposed provision for implementation such incentives.</p> <p>It will be worth mentioning that inline with the intent with MoP order, the consumer procuring power from renewable power should be exempted from levy of transmission charges. Contrary</p>

S.No.	Reference Clause	Proposed/Existing Clause	Recommended Clause	Rationale
		<ul style="list-style-type: none"> 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>Provided that in case total 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 "SDT_G" shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p>	<ul style="list-style-type: none"> 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>Provided that in case total 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 "SDT_G" shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p> <p>Provided Further in time blocks where the SDR_G is equal to SDT_G the above proviso shall not be applicable.</p>	<p>to intent the proposed amendment subjects such consumer to levy of transmission charges.</p> <p>It will be worth mentioning that there is no provision allowing consumers to obtain different quantum of GNA based on time blocks, ensuring long term access availability complementing the PPA tenures. Due to this requirement consumers are constraint to obtain GNA for quantum equivalent to their base load/PPA capacity. Also, the generation from wind and solar source is variable in nature depending upon availability of resource and doesn't complement the GNA capacity.</p> <p>The proposed amendment while calculating The GNA RE puts a lower limit on total drawal schedule which 75% of GNA. As consumers are procuring power from variable generation sources schedule from which is less than 75% in considerable time-blocks, they are subjected to levy of</p>
9	13(2)	No transmission charges for the use of ISTS shall be levied for the following TGNA quantum, 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:	No transmission charges for the use of ISTS shall be levied for the following TGNA quantum, 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:	

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		$T-GNA_{RE} \text{ (in MW)} = T-GNA \times \frac{\sum_{n=1}^T \left(\frac{SDR_{TG}}{SDT_{TG}} \right)}{T}$ <p>Where</p> <ul style="list-style-type: none"> SDR_{TG} is drawl schedule (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block. SDT_{TG} 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>Provided that in case total 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 "SDT_{TG}" shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p>	$T-GNA_{RE} \text{ (in MW)} = T-GNA \times \frac{\sum_{n=1}^T \left(\frac{SDR_{TG}}{SDT_{TG}} \right)}{T}$ <p>Where</p> <ul style="list-style-type: none"> SDR_{TG} is drawl schedule (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block. SDT_{TG} 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>Provided that in case total 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 "SDT_{TG}" shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p>	<p>transmission charges. Despite of procurement of power only from wind & solar sources such consumers will be forced to pay transmission charges.</p> <p>To deal with the above situation we suggest that in all case where total power scheduled is from wind and solar sources, condition of 75% should be removed</p> <p>Further, in response to justification given by this Hon'ble commission in relation to considering 75% of GNA capacity, we would like to submit following:</p> <ol style="list-style-type: none"> For a DISCOMs in a time block, the scenario assumed where whole of the energy is assumed to be met from wind & solar source will negligible. Further, under all such scenario complete wavier should be allowed. We would like submit considering such

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			<p>Provided Further in time blocks where the SDR_{TG} is equal to SDT_{TG} the above proviso shall not be applicable.</p>	<p>improbable events bar these regulations to meet the objective.</p> <p>2. For a stand-alone open access consumer procuring power from wind and solar sources, if Extra GNA is booked with intention of gaming, they will be still be liable to pay the state transmission charges for such quantum making such actions practically impossible.</p> <p>3. Although, the assumed events are less probable, same needs to be dealt with. We suggest that CERC should develop a mechanism curtailing GNA in event of non-utilization clubbed with provision for penalties equivalent to relinquishment charges.</p>
8	13(3)	Where COD of a Connectivity Grantee is delayed from start date of Connectivity in	Where COD of a Connectivity Grantee is delayed from start date of Connectivity in	Ministry of Power's has vide its direction (dated 15th January

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		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>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 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.</i></p>	<p>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> <p>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.</p>

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>
2	13(2)	<p><i>transmission charges for the use of ISTS shall be levied for the following TGNA quantum, 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:</i></p> $T-GNA_{RE} \text{ (in MW)} = T-GNA \times \frac{\sum_{n=1}^T \left(\frac{SDR_{TG}}{SDT_{TG}} \right)}{T}$ <p><i>Where</i></p> <ul style="list-style-type: none"> <i>SDR_{TG} is drawl schedule (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block.</i> <i>SDT_{TG} is total drawl schedule (in MW) under GNA through ISTS from all sources in nth block.</i> <i>‘n’ is the nth time block</i> 	<p>The proposed clause suggests the methodology to calculate T-GNA RE. As T-GNA can be obtained from one-time block to 11 months. We would like clarification on how the monthly T-GNa quantum will be calculated.</p>

		<ul style="list-style-type: none"> • <i>T is number of time blocks in a month = 96X number of days in a month</i> <p>Provided that in case total 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 “SDT_{TG}” shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p>	
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