DAMODAR VALLEY CORPORATION
COMMERCIAL DEPARTMENT
DVC. TOWERS: V I P ROAD, KOLKATA- 700 054.

Tel. No: 033-2355-1172/7931 **FAX: 033-2355-2129**

No. Coml./CERC/ 3459 **Date:** 11 **/03/2022**

To

The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi -110 001

Sub: - Comments of Damodar Valley Corporation on the Draft CERC (Connectivity and General Network Access to the Inter-State Transmission System Regulations), 2021.

Dear Sir,

This is to bring to your kind information that comments of Damodar Valley Corporation on the draft CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2021 have been attached herewith as Annexure for your kind perusal and consideration.

Yours faithfully,

Enclo: As above.

Sandip Pal 11/3/22
Chief Engineer (Commercial)

Copy to: The Asstt. Chief (Legal), CERC, 4th Floor, Chanderlok Building, 36, Janpath, New Delhi - 110 001

Comments on Draft CERC (Connectivity and General Network Access to the Inter-State Transmission System Regulations), 2021.

1. To quote Cl. No. 1.3 (ii) of IEGC:

"For the purpose of IEGC, Damodar Valley Corporation (DVC) will be treated similar to a SEB, in view of the fact that DVC is a vertically integrated utility like a SEB and has its own generation, transmission and distribution in the identified command area".

For meeting up the bilateral schedules from different Generators, DVC has to inject through CTU Network. At the same time, DVC has to draw power from CTU Network to meet internal demand. So, from scheduling point of view at ERLDC, DVC Generators are being considered as embedded generators within the State and 'scheduling of Generators' (being considered in Net Schedule of DVC State) are excluded from the purview of ERLDC.

As per the consideration in draft GNA Regulations, in case of dual connectivity of Generator 'A generating station, already connected to or intending to connect to intra-State transmission system shall also be eligible for Connectivity to ISTS for a quantum not exceeding the balance of the installed capacity'.

DVC already commissioned 400/220 kV ICTs at 400 kV Switchyard of its export oriented stations (i.e. DSTPS, KTPS and BTPS-A). Further, commissioning of ICTs at MTPS 7&8 switchyard and RTPS switchyard is scheduled by 2024-25 alongwith interconnecting transmission lines, to cater to the projected internal load growth.

Under the GNA regime, considering DVC Generators as embedded entities in the State as a whole, DVC prays that, excepting for the quantum as specified in the draft GNA Regulations, DVC shall not be made liable to pay any other charges, which may become an extra burden on the customers of DVC.

2. Since DVC is guided by CERC Regulations, it is also proposed that DVC may be allowed to apply the provisions of GNA Regulation while granting of connectivity / recovery of transmission charges from its Intra-State entities.

Sandip Pal