



एनटीपीसी
NTPC
A Maharatna Company

NTPC Submission on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022





Power Drawl by Thermal Unit During Unit Tripping and Start Up

Amendment to Regulation 12 (1)(c) of the Principal Regulations Provides 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.***

Submission:

- As per Draft amendment a thermal unit is required to have TGNA for drawing the power from the grid otherwise Transmission Deviation charges @ 135% of normal Tr. Charges shall be payable.
- In case of thermal unit tripping, due to process requirement there would always be requirement to draw power instantaneously from the grid to run certain mandatory auxiliaries like Cooling water System, Turbine Lubricating oil system, Generator Seal Oil System, Air preheater, Station lighting, & Instrument air compressors. Stoppage of above auxiliaries may lead to equipment damage.
- Unit tripping cannot be anticipated in advance which may be due to outage of unit auxiliary or transmission lines.
- It is not feasible to wait to draw the such power by arranging through TGNA as the same shall be available only after 12^{th} time block while the unit shall continue to draw the power from the grid to run mandatory auxiliaries.
- If standby supply is kept tied up for such drawal from state Discom it shall add to the operational cost.

Power Drawl by Thermal Unit During Unit Tripping and Start Up

- Similarly thermal unit may be required to be start up immediately after tripping or may be required due to start up based on beneficiary requirement.
- The requirement of arranging the power through TGNA shall increase the process time. Further duration and quantum of drawl of power in each time block during the light up process may vary significantly due to process requirement which shall cause significant transmission deviation charges.
- It is submitted that requirement of TGNA otherwise, applicability of significant transmission deviation charges shall cause increase in cost of power for the beneficiaries availing power from the stations operating under the regulated regime.
- Considering drawl of power by thermal generator as process requirement and since DSM Regulation 2022 also envisages the drawal of power under DSM, Drawl may be allowed under DSM as deemed TGNA and levying transmission charges at normal rates.
- ***Regulation 12 (1)(c) following proviso may be provided :***

  Provided that if a thermal generating station having GNA, draws power through ISTS on account of unit tripping or unit starting shall be allowed considering as deemed T-GNA, and on payment of applicable TGNA charges on such drawl on net metered drawal in a time block.

Exchange of infirm Power by Thermal Power Stations before CoD

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Amendment to Regulation 13(10) of the Principal Regulations provides that:

*Regional entity Generating stations **(a) drawing start-up power** or **(d) injecting infirm power**, through ISTS, shall pay transmission charges for injection or drawl beyond its T-GNA , at the rate of Tr. Deviation Rate for the State in which they are located.*

Submission:

- As per draft Regulation for drawing the start up power and for injecting the infirm power a thermal generating unit is required to have TGNA otherwise Transmission Deviation charges @ 135% of normal Tr. Charges shall be payable.
- As per the GNA Regulation to be notified the generator is allowed to inject upto the installed capacity without any transmission charges. Further no such eligibility has been provided nor envisaged for TGNA by generator for infirm power injection.
- During the commission stage the quantum of start up power and injection of infirm power may vary significantly hence despite taking the TGNA, there may be significant deviations due to quantum and time variation.
- It is submitted that the requirement of taking TGNA during infirm power injection or withdrawal may please be dispensed with and exchange of infirm power may be allowed considering it as **Deemed TGNA** and after payment of transmission charges as applicable.
- ***Hence in Regulation 13(10) following may please be provided:***

  Provided that the exchange of infirm power shall be allowed considering it as deemed TGNA at the rate of Transmission charges for the State in which the generator is located.

Drawl of Power by Stations Under Shutdown due to Grid requirement

Amendment to Regulation 12 (1)(c) of the Principal Regulations provides that :

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."

- **Submission:** Hon'ble Commission in DSM Regulations, 2022 has pleased to mention that:

  (b) ***The charges for deviation for drawal of start-up power before COD of a generating unit or for drawal of power to run the auxiliaries during shut-down of a generating station shall be payable at the normal rate of charges for deviation.***

- Stations may be under shutdown condition due to grid requirement however power is required to be drawn to run the auxiliaries to run the mandatory auxiliaries.

- Since the unit may be required to be started as per the Grid requirement which can not be anticipated, hence such drawal may also be permitted under deemed TGNA and levying transmission charges at normal rates.

- ***Accordingly, the Regulation 12 (1)(c) may please be modified as:***

  Provided that if a generating station under shut down having GNA, draws power through ISTS, the same shall be permitted considering it as deemed TGNA and on payment of applicable TGNA charges on such drawl on net metered drawal in a time block.

Waiver of Transmission Charges Under Flexibility Scheme

- In order to promote bundling of cheaper Renewable Energy with costlier Thermal Power, MoP vide dt. 12.4.22 has issued revised ***"Scheme for Flexibility in Generation and Scheduling of Thermal/ Hydro Power Stations through bundling with Renewable Energy and Storage Power".***
- As per the scheme generating companies shall be allowed to utilize renewable energy for supplying power against their existing commitments/PPAs for replacement of Thermal/ Hydro power to procurers anywhere in India.
- The scheme envisages that no transmission charges for use of ISTS shall be levied when RE power from an RE power plant is being scheduled to the Thermal/Hydro generating stations as a replacement power.
- It is submitted that formula provided in supplementary amendment is suitable for Discoms wherein non RE power is drawn during non-solar hours under the same GNA quantum and accordingly Transmission charges should be applicable. However, in case of flexibility scheme the thermal generator shall not be scheduling any power during non-solar hours hence no transmission charges liability should occur to Thermal generator during these hours.
- As per the formulation provided in Supplementary amendment partial waiver of transmission charges shall be available however for viability of the scheme full waiver of transmission charges on such RE power scheduling is required.

Waiver of Transmission Charges Under Flexibility Scheme

The same is elaborated as follows:

- Suppose 100 MW Solar project capacity tied up for replacement of thermal power and accordingly GNA for scheduling of such RE power is also considered as 100 MW. Then waiver of transmission charges under different Scenario shall be as follows:

S.No.	Scenario	*RE Drawl Schedule (SDR_G)*	*Total Drawl Schedule (SDT_G)*	GNA_{RE} = GNA X (SDR_G / SDT_G)	Remarks
1.	100 MW scheduled for replacement of Thermal Power	100	100	= 100 x (100/100) = 100 MW	100% waiver of Transmission charges is available for the block
2.	60 MW scheduled for replacement of Thermal Power	60	60	= 100X (60/75) =80 MW	80% waiver of Transmission charges is available for the block
3.	0 MW Scheduled During Non Solar Hours/unit under shut down	0	0	= 100X (0/75) = 0 MW	No waiver of Transmission charges is available for the block

- Therefore it is submitted that the for scheduling of RE power Thermal generator may not be considered as drawee DIC and full waiver of Transmission charges may be provided for scheduling of such RE power by thermal Generator.

Extension in LTA / GNA effective Date

- Due to various Force Majeure situation like COVID, Geo-political situation and other conditions beyond the control of the RE generator, there may be delay in achieving the CoD of the station.
- Recognising the above facts MoP GoI in its order dt. 30.11.21 has mentioned that:

  "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 the LTA shall also get extended accordingly, and it will be deemed that the period of ISTS waiver is extended by the said period."

- *It is submitted that if extension in CoD has been granted by the competent authority, then the commencement of effectiveness of the GNA may also be extended without any transmission charges liability on the generator.*
- *Further, for the intervening period till the GNA is notified, the extension of LTA effectiveness date may also be provided if competent authority has granted extension in CoD of the Station.*

Migratory Birds at NTPC Dadri

Thank You

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