GRIDCO LIMITED

GRIDCO
Empowering Orissa

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CIN NO-L40109OR1995SGC003960

By E-mail

No-DC-CGM-PP-167/2019 186 Dated : 31.12.2019

To

The Secretary,
Central Electricity Regulatory Commission,
3rd Floor, Chandralok Building,
36, Janpath,New Delhi- 110001
E.mail: secy@cercind.gov.in

Sub: Request for extension of time for submitting views/comments/objections on the Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations,2019

Ref: 1. Public notice ref. L-1 / 250 / 2019 /-CERC dated 31.10.2019
2. Public notice ref. No.L-1/250/2019/CERC Dated 3rd December 2019

Sir,

With reference to above, it is to intimate you that a meeting was conducted at ERPC, Kolkata on 30.12.2019 to discuss on major changes in the proposed Draft **CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019** and its impact on sharing of Transmission charges on the DICs including constituents of E.R. Region.

Moreover it is learnt that a workshop is also being arranged on 06.01.2020 at CERC, New Delhi. Hence, it is requested to kindly allow GRIDCO Ltd. to submit their views/comments/objections by 15th January 2020 so that submission can be made in a meaningful and complete shape.

Thanking You.

Yours faithfully,

Sanayak 31/12/19

Chief General Manager (PP)

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Views of GRIDCO on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019

CERC has notified Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019 & has sought views on it from stake holders. Sharing of Inter-State Transmission Charges is one of the important aspect of power sector as the effective Transmission pricing signal the future investment decision & is a key factor for electricity market development. Hence design of electricity transmission charge allocation & the objectives of Regulatory instruments while framing such framework of Transmission pricing will shape the future of power sector in many profound ways. GRIDCO here by offers its considered views on the aforesaid draft Regulations:

These Draft regulation has been proposed by Honble CERC In exercise of the powers conferred under Section 178 read with Part V of the Electricity Act, 2003 (36 of 2003), and all other powers enabling it in this behalf. Sec 36 of Electricity Act clearly mentioned that **"The rates, charges and terms and conditions referred to in sub-section (1) of Sec 36 shall be fair and reasonable, and may be allocated in proportion to the use of such facilities." But the proposed draft regulation aims to allocate the major portion of ISTS charges on socialisation principle by compartmentalising the total transmission charge in to 4 components. Gridco humbly submits that such allocative principle as prescribed in proposed draft regulations in the form of National HVDC, National RE & Regional HVDC component is against the mandate of EA 2003 which distinctly prescribe for Transmission charge allocative principle in proportion to the use of ISTS facilities.**

3.0 Definitions

Existing provision in Proposed draft:

2.1. (d) 'buyer' means a person, including beneficiary, purchasing electricity through a transaction scheduled in accordance with the regulations applicable for short-term open access, medium-term open access and long-term access;.

2.1. (o) 'seller' shall have the same meaning as defined in Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2014

Gridco's view:

When Seller definition has been ascribed to have same meaning as per Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulation, 2014, instead of defining the Buyer definition separately, the same may be endorsed to the definition given in CERC Deviation Settlement Mechanism regulation. No need to define Buyer separately.

Existing provision in Proposed draft

2.1 (f) 'Designated ISTS Customer' or 'DIC' means the user of any element(s) of the Inter-State Transmission System (ISTS) and shall include generating station, State Transmission Utility, Distribution Licensee including State Electricity Board or its successor company, Electricity Department of State, Bulk Consumer and any other entity directly connected to the ISTS and shall further include any intra-State entity or any trading licensee who has obtained Medium Term Open Access or Long Term Access to ISTS;

Gridco's view:

The entity connected at ISTS & drawing power in Short Term Open Access need to be included in the definition of DIC as because no free riding should be allowed in the form of zero transmission charge for STOA & transferring the burden of higher transmission charges on other long term customers. At this stage of maturity in Indian power market cross subsiding in any form should not be allowed by allowing entity availing STOA from paying transmission charge & letting others LTA customers pay for them. Hence Gridco submits to include STOA customer in DIC definition.

Existing provision in Proposed draft

2.1 (V) **'Yearly Transmission Charges'** or 'YTC' means the Annual Transmission Charges as determined or adopted by the Commission for all elements of ISTS which have achieved COD as on the last day of Billing month, and for the transmission lines connecting two States and intra-State transmission lines certified by respective Regional Power Committee as being used for inter-State transmission of electricity;

Gridco's view:

Since the Peak Block has been considered as that block where sum of ISTS drawl of States are maximum, CoD of 765/ 400 kV line will significantly alter the flow pattern and accordingly the usage pattern of DICs will get altered. Hence Gridco proposes that in order to avoid such flow alteration in the Billing month, only those transmission element may be considered for YTC calculation which have achieved CoD till last day of the Month prior to Billing month so that in the billing month line flow stability won't get affected by new element addition.

Principles of sharing transmission charges

Existing provision in Proposed draft:

3 (1) The transmission charges shall be shared amongst the Designated ISTS Customers such that:-

(a) The Yearly Transmission Charges are fully recovered; and

(b) Any adjustment towards Yearly Transmission Charge on account of revision of transmission charges as allowed by the Commission are recovered.

Gridco's view:

The transmission service provider/ISTS licensee are now regulated firm which under cost-plus regulation regime has no incentive to reduce costs since they are authorized to recover its costs plus a fair return on its capital.

By regulatory assurance of the full cost recovery, without sufficient checks & balances (regulatory instruments) towards performance evaluation in terms of usage of Planed Transmission infrastructure, Gold Plating in Transmission Infra will be a natural consequence which will not only lead to huge suboptimal resource creation, but such redundancy will be forced on existing DIC in terms of hefty financial burden. (As TSP will always be inclined to capital enhancement so as to have higher profit over and above efficiency in an assured return regulatory regime).

The report of the Task force state that out of Monthly Transmission charge of approximately Rs. 2500 Crore, Lines worth Rs. 783 Crore were found to be marginally utilized. The aforementioned mandate will transfer the burden of unutilized lines to those DICs who have limited role either in planning and construction of these lines nor they are responsible for under utilization of line.

Hence Gridco submits that in order to restrain such unintentional but structured inefficiency, Regular performance review of the past decisions

(towards building transmission capacity, in meeting its intended objectives) may be kept as regulatory provision so that the investment in trans infra does not goes beyond any optimal efficiency point in the wake of higher profit

Accordingly it is requested to have a check against such Gold Plating.

Existing provision in Proposed draft:

3 (2) The computation of share of transmission charges for each DIC shall be based on the technical and commercial information provided by the DICs, inter-State Transmission Licensees, NLDC, RLDCs and SLDCs to the Implementing Agency.

Gridco's view:

Rather than generalising the overall data requirement, it would be better for a detail segregation of data requirement from individual entity/ stakeholders. Moreover Regulation 21.6 suggest for levy of penalty in the form of additional transmission charge @ 1% of the transmission charges under the First Bill for the month. Hence detailed segregation of accountability on part of individual entity towards specific data submission need to be spelled out. It will foster more accountability of part of individual entity.

Existing provision in Proposed draft:

3 (4) Long Term Access or Medium Term Open Access for projects covered under clause (1) of Regulation 11 shall not be considered for apportionment of transmission charges under Regulations 5 to 8 of these regulations.

Gridco's view:

It has been mentioned at 5.9 clause of Annexure-I to Draft regulations that the transmission system covered under National RE component shall be considered at Zero cost in the Line wise transmission charge calculation. Such exclusion of RE LTA/MTOA & Zero cost of Transmission system build for RE evacuation will definitely skew the transmission charge & Load flow pattern of the other DICs. Most RE evacuation planned at 400KV or 765 KV will definitely alter the ISTS drawl & flow pattern. Hence necessary provision may be kept to avoid such skewed effect.

Apart month wise Long Term Access or Medium Term Open Access for projects covered under clause(1) of Regulation 11 need to be uploaded in the CTU/ NLDC website so as to maintain transparency & avoid information asymmetry.

CHAPTER 2

COMPONENTS AND SHARING OF ISTS CHARGES AND LOSSES

Existing provision in Proposed draft:

5. Components and sharing of National Component (NC)

(1) National Component shall be the sum of following components:

(a) National Component-Renewable Energy (NC-RE); and

(b) National Component-HVDC (NC-HVDC).

(2) National Component-Renewable Energy shall comprise of transmission charges for transmission systems developed for renewable energy projects as identified by the Central Transmission Utility.

(3) National Component-HVDC shall comprise of the following:

(a) 100% transmission charges for "Back to Back HVDC" Transmission System;

(b) 100% transmission charges for Biswanath Chariali/Alipurdwar – Agra HVDC Transmission System;

(c) Proportionate transmission charges of Mundra–Mohindergarh HVDC Transmission System corresponding to 1005 MW capacity; and

(d) 30% of transmission charge for all other HVDC Transmission Systems

except those covered under sub-clauses (a), (b) and (c) of this Clause of these regulations.

(4) Transmission charges for the National Component shall be shared by the drawee DICs in the ratio of their quantum of Long term Access plus Medium Term Open Access.

(5) Transmission charges for National Component in respect of injecting DICs with untied LTA capacity shall be shared by such injecting DICs in the ratio of their untied LTA capacity.

Gridco's view:

Regarding National RE component : In order to achieve the target of 175 GW of RE capacities by year 2022, no doubt huge transmission capacity for evacuation of such RE power would be required to be added in the system. But With due regard to waiver declaration by MoP towards such RE evacuation for specific category of RE Generators, the respective funding should be as well met from Central budgetary support, by providing subsidy/grant to compensate waiver of transmission charges for wind and solar power projects connected to ISTS network. Instead CERC is proposing to endorse all those hefty burdens on existing DICs. Such financial promotion aimed at making RE competitive at par conventional power don't have any meaning when it immediately burdernise all other DICs, i.e. one group of stakeholders are benefited at the cost of others which is absolutely unfair.

Sec 36 (Charges for intervening transmission facilities) of Electricity Act 2003 clearly mandate appropriate commission to specify "The rates, charges and terms and conditions of such Charges for intervening transmission facilities

which shall be fair and reasonable, and may be allocated in proportion to the use of such facilities.". Moreover EA, 2003 mandate progressive reduction of Cross Subsidy, whereas the proposed Draft Sharing regulations 2019 suggest inclusion of cross subsidisation in Transmission charge allocation in progressively expounded manner by socialising the RE evacuation cost among those Users who may not use such transmission facilities at all.

Gridco strongly oppose such socialisation proposal which is baseless without any detailed study on impact of such waiver on the system. Only because some of the stake holders are opposing, can't be a ground to load all other stakeholders in the name of National component who may not be even user of such Transmission facilities.

Socialisation in any form is an unreasonable measure of usage.

Gridco humbly submit that when a waiver declaration is done by MoP for specific category of Generators viz. RE, the respective funding should be as well met from Central budgetary support, instead of socialising those charges which is not at all an equitable proposition & against the mandate of EA, 2003 as mention above.

Regarding National HVDC component:

Out of existing ISTS assets all over India, which category of asset constitute what proportion of cost that need to be published by Hon'ble CERC before coming up of such allocation principle. DIC per se don't have access to all India YTC data with such granularity & if at all NLDC is requested to give any information on Existing PoC data they are hesitant to give in proper format if Regulation don't explicitly state such data formats. Hence there is hardly any chance on part of DIC to analyse/Interpret the impact of such compartmentalisation of Transmission charge into four components.

But on principle basis, Gridco suggests that all HVDC including back to back HVDC, need to be shared by those entities only, for whom it has been created, i.e., **it should be shared strictly on causer pays principle basis rather than** unduly socializing such costs.

However 10 % YTC of all these HVDC charges may be considered towards reliability support/ component & shared by all DICs based on LTA/MTOA till a scientific method is evolved quantifying the reliability benefit availed by each DICs. Without quantification of benefit derived from certain HVDC project & naming those project as of national importance which are developed as a result of mere ineffective decision & uncoordinated planning, does not qualify those project (Viz. Biswanath Agra Cheriyali HVDC) for socialisation among all DICs. Gridco humbly request Hon'ble commission not to consider such unduly socialization of costs.

The sharing of HVDC between its beneficiaries regions should be on the Regional postage stamp method (rather than proposed sharing in National Components) depending upon the flow in the respective month in the HVDC system. Since primarily HVDC is planned & being used by beneficiaries of connecting two regions only, depending upon Load flow direction for a particular month the constituents of the specific drawee region may bear the charges based on their LTA & MTOA contract.

Existing provision in Proposed draft:

6. Components and sharing of Regional Component (RC)

(1) Regional Component shall be the sum of the following components:

(a) Regional Component of HVDC (RC-HVDC) -70% of transmission charges of HVDC Transmission Systems except those covered under clause (3) of Regulation 5 and clause (6) of Regulation 6;and

(b) Transmission charges for Static Compensator (STATCOM), Static VAR Compensator (SVC), Bus Reactors, and any other transmission element(s) identified by Central Transmission Utility being critical for providing stability, reliability and resilience in the grid.

Gridco's view (Regional HVDC component):

HVDC systems were developed as a specific transmission requirement built specifically for intended users & agreed in the respective Standing committee meeting of those utilities. When the cost has been caused/ imposed by a particular group of users/stakeholders & they have agreed to bear cost of such service in their respective Standing Committee meeting for such Transmission facilities, now there is no point in socialisation of such HVDC cost only because, over time such past decision are costing dearly on some DICs. Now CERC proposition on HVDC cost socialisation will force some entities to subsidize the costs for others.

Gridco suggests that without compartmentalising HVDC in to national & regional basis, all HVDC including back to back HVDC, need to be shared by those entities only, for whom it has been created, i.e., **it should be shared strictly on causer pays principle on basis rather than** unduly socializing such costs. 10 % YTC of all these HVDC charges may be considered towards reliability support/component & shared by all DICs based on LTA/MTOA till a scientific method is evolved quantifying the reliability benefit availed by each DICs.

Regarding the Transmission charges for Static Compensator (STATCOM), Static VAR Compensator (SVC), Bus Reactors, and any other transmission

element(s) identified by CTU being critical for providing stability, reliability and resilience in the grid, Gridco suggest that till quantification of reliability benefit drawn by each DIC is determined, such components may be included in the AC system as is being done presently. The recovery of cost would be as per Usage basis.

Existing provision in Proposed draft:

7. Components and sharing of Transformers Component (TC)

(1) Transformers Component shall comprise of transmission charges for inter-connecting transformers planned for drawal of power by the State. The list of such transformers for each State shall be provided by the Central Transmission Utility to the Implementing Agency.

(2) Transformers Component of transmission charges shall be borne by the State in which they are located.

Gridco's view

Transformer being part of the AC network the cost of these may be included in the Total AC system YTC & for recovery allocation may be done as per Usage basis.

Existing provision in Proposed draft:

8. Components and sharing of AC System Component (ACC)

(1) AC System Component shall comprise of transmission charges excluding transmission charges covered under Regulations 5 to 7 of these regulations.

(2) AC System Component shall be the divided into the following components:

(i) Usage Based Component (AC-UBC); and

(ii) Balance Component (AC-BC).

(3) Transmission charges for AC-UBC shall be shared by DICs corresponding to their respective usage of transmission lines, in accordance with Regulation 9 of these regulations.

Gridco's view:

In view of the efficacy of the existing PoC mechanism in meeting its objective as enshrined in Tariff Policy , reducing congestion & enabling power market, there is no need of segregating AC system component into AC –UBC & AC – BC part. Both AC –UBC & AC – BC component should be merged to one AC component& the sharing should be undoubtedly on usage basis. There is no rationality to in-build a socialisation component into AC system & allocating the balance component on the LTA & MTOA basis resulting in very low contribution of total transmission charges to be apportioned on usage basis & governed by PoC. Such segregated approach to allocation principle of AC component in order to bring more socialisation component into transmission tariff design is pointing question on basic intent of transmission tariff framework which is mandated to be sensitive towards Distance, Direction & Quantum of power flow i.e. to be reflective of actual usage.

Such attempt of socialisation will distort the economic signal that PoC mechanism has been successfully contributed till date. The option of disagreement of some stakeholders to such an efficient & effective allocative principle through PoC & thereby bringing in more socialisation component in to transmission pricing should be ruled out by Hon'ble commission.

In a process of combining conflicting positions into a common position, under a decision rule of unanimity, the rationality & efficacy of PoC methodology should not be compromised.

Existing provision in Proposed draft:

9. Computation of share of transmission charges under AC-UBC

(8) The Implementing Agency shall aggregate transmission charges at dawal nodes within the geographical boundary of the State to determine the allocation of charges for the State under AC-UBC.

(9) Any other injecting DIC with Long Term Access to target region with untied LTA capacity shall be apportioned charges under AC-UBC which shall be separately indicated by the Implementing Agency.

Gridco's view:

9 (8) As already stated above, Gridco submits that instead of only AC-UBC part coverage in Load flow related usage, the total AC system should be captured for computation of share of transmission charges.

9 (9) Allocating Merchant Generator cost by adding proportionately to all entities based on their base cost share is not just & fair, it will distort the other DIC's transmission charges. Merchant generators should be allocated charges based on generation at time of All India peak for the month for PoC component.

CHAPTER 4

ACCOUNTING, BILLING AND COLLECTION OF TRANSMISSION CHARGES

Existing provision in Proposed draft:

12. (5) **Timelines** for preparation of base case, notification of transmission charges, issue of Regional Transmission Accounts and raising bills shall be as under:

(a) Base case for the Billing month shall be prepared by the Implementing Agency by 15th day of the month following the Billing month.

(b) Payable transmission charges shall be notified by the Implementing Agency by 25th day of the month following the Billing month.

(c) Based on the notified allocation of charges by the Implementing Agency, Regional Power Committee Secretariat shall issue Regional Transmission Accounts by the end of the month following the Billing month.

(d) Central Transmission Utility shall raise bills on DICs based on Regional Transmission Accounts in first week of the second month following the Billing month.

Gridco's view:

12 (5) (a): Unlike the present practice, the base case prepared by IA need to be uploaded in NLDC website, which DIC can access. Hence Gridco proposes that such base case prepared by 15th day of the month following the Billing month need to be uploaded in NLDC website.

12 (5) (b) similarly the Payable transmission charges which shall be notified by the Implementing Agency by25th day of the month following the Billing month need to be uploaded in its website.

12 (5) (d) Gridco humbly submits that along with raising bills on DICs based on Regional Transmission Accounts in first week of the second month following the Billing month, Central Transmission Utility also need to update such Bills in the BCD portal with intimation to DIC.

Existing provision in Proposed draft:

13 (2)(c)(iii) **Transmission Deviation Rate** shall be calculated as follows:

a. Transmission Deviation Rate for a State shall be charged at 1.20 X (transmission charges of the State for the Billing month)/(quantum of Long Term Access plus Medium Term Open Access of the State for the Billing month)

b. Transmission Deviation Rate for generating stations and bulk consumers shall be charged @Transmission Deviation Rate for the State where the generating station or bulk consumer is located.

13 (2)(vii) The charges for transmission deviations shall be calculated for a State as a whole. The charges for transmission deviation for an embedded intra-State entity shall be as determined in accordance with the regulations or orders of the respective State Commission.

13 (3) No transmission Charges shall be levied for Inter-State transmission system in respect of Short Term Open Access transactions.

Gridco's view:

As per the above regulation provision, if there is any transmission deviations by a state and such deviations are attributable to some embedded entity/entities of the state, then the state should have its own set of approved rules/regulations or orders to reimburse such charge from such embedded entity/entities, i.e., it *rests squarely on respective State commission's shoulders to apportion such transmission deviation caused by an embedded intra-State entity.* But such premise has not addressed the following scenario such as

1. When the state is well within its LTA limit but the leftover cushion transmission capacity being used by intra state entities to avail their requirement through STOA & ultimately no transmission deviation by State. Under such circumstances the state will pay the total bill to the billing agency, but the embedded entity/entities got a free ride on state's cushion.
2. Moreover such provision will again complicate the sharing between state & embedded Intra-state entities when there are a no of embedded Intra-state entities as traceability of individual embedded customer towards such transmission deviation need to be identified. Till the apposite State regulations are in place, the States only be held responsible for paying transmission deviation charge which is not rationale.
3. Further since the proposed regulation vouch for "No transmission Charges for Inter-State transmission system in respect of Short Term Open Access transactions", it will be an encouragement to use of STOA route as a free rider rather than paying for long term commitment in term of LTA/MTOA for power requirement. This would in turn inhibit panned development of Transmission capacity for future & more importantly will lead to huge transmission deviation by DICs/State because of intra state embedded customers enhanced inclination to meet power requirement through STOA.
4. As such free riding through STOA will go against the mandate of Electricity Act 2003. Vide Sec 38 (2)(d), EA, 2003 mandate that "Non discriminatory Open Access to ISTS transmission system can only be provided for Use *on payment of the Transmission charge*.

Existing provision in Proposed draft:

19: Transition Period

(1) The Implementing Agency shall ensure smooth transition to the mechanism under these regulations.

Gridco's view:

The smooth transition should include providing necessary software, Knowledge &detailed procedure of calculation by IA etc., which need to be disseminated to DIC at every regional level.

CHAPTER 5

INFORMATION AND PROCEDURES

Existing provision in Proposed draft:

20. Procedures to be framed under these Regulations

20 (1) Implementing Agency shall notify detailed procedures and formats for collection of generation and demand data from each DIC, data pertaining to the Basic Network and for calculation of transmission charges within 90 (ninety) days of the notification of these Regulations and post it on its website.

(2) The software for the implementation of these regulations shall be audited or cause to be audited by the Commission before it is put to use, and thereafter from time to time as may be decided by the Commission.

(3) Central Transmission Utility in discharge of its functions under these Regulations may make such procedure and prescribe such forms as may be necessary for the purpose of Billing, Collection and Disbursement, which is not inconsistent with these regulations or any other regulations of the Commission.

Gridco's view:

The detailed procedure need to be discussed with DICs in the respective Regional level & then need to be approved by Hon'ble commission before finalisation & uploading in NLDC website. Sufficient provisions should be there for providing all input data to DICs for further verification & IA should maintain all transparency in this regard.

Thus proposed because DICs has faced hindrances in obtaining Input data from IA (NLDC) for running Webnet software at DIC (Gridco) level citing the reason that such provisions are not explicitly mandated in Regulation. Hence such operational issues faced by DICs can only be avoided if DICs are included in the detailed procedure part itself& no doubt inclusion of DICs at this level will enhance transparency.

1. Not to repeat the Black Box tag given to PoC calculation& methodology perse, the "methodology", "software" & "calculation" need to be disseminated at DIC level as well. Hence Gridco proposes that while auditing the software for the implementation of the proposed regulations, DICs from the regional level at least (if not all DICs) shall be made part of the auditing process along with NLDC/ Commission.
2. CTU should be mandated to maintain sufficient transparency while prescribing procedure & forms on Billing, Collection and Disbursement purpose.
3. Apart from the above the list of Untied LTA capacity (Generator wise) need to be updated every month by CTU/NLDC which is considered for calculation of Transmission charge of DICs.

Existing provision in Proposed draft:

21. Timeline for furnishing the information

On or before 7 (seven) days after end of Billing Month, DICs shall submit following data:

(a) MW and MVAR Data for injection or drawal at various nodes or a group of nodes for peak block for each Billing Month.

(b) Quantum of power tied up through PPAs for interchange of power under long term access or approved medium term open access.

(5) In the event of such information as required by the Implementing Agency is not made available within the stipulated timeframe or to the level of details required, the Implementing Agency shall compute transmission charges based on such information from available sources.

(6) If a DIC does not provide the required data, including injection or drawal data for intra-State points within stipulated time period, it shall be levied an additional transmission charge @ 1% of the transmission charges under the First Bill for the month.

Gridco's view:

Given time limit of 7 days would be difficult on part of DICs to process all the data of Various ISTS connected Nodes for peak block for each Billing Month if peak block happens to be in any block on the last day of the billing month.

More over in view of the *penalty provision of additional transmission charge @ 1% of the transmission charges under the First Bill for the month due to non-submission of data,* the time limit for DIC to submit MW and MVAR Data for injection or drawal nodes may be increased to 15 days.

Existing provision in Proposed draft:

22. Information to be published by the Implementing Agency

(1) The information to be made available, on its website, by the Implementing Agency shall include:

(a) The Basic Network, generation at nodes and drawal at nodes considered for the base case and the load flow results for each Billing Month, on its website, immediately after its finalization;

(b) Assumptions, if any;

(c) Details of transformers, transmission system for renewables, list of elements considered under Regional Component and corresponding transmission charge considered for the Billing Month;

(d) Schedule of transmission charges payable by each constituent for the Billing month with Component-wise break-up;

(e) Yearly Transmission Charges as submitted by the transmission licensees covered under this Regulation and computation by Implementing Agency;

(f) Zone-wise details of transmission charges with details of transmission lines being used by each DIC and consequent transmission charges being borne by each DIC under AC-UBC component;

(g) Details of Long Term Access and Medium Term Open Access for the Billing Month;

(h) New transmission lines or transmission systems added during the Billing Month

(i) Detailed calculations of indicative cost for arriving at the average cost in respect of each transmission line;

All information as at clause (1) above shall be available on website of the Implementing Agency in editable user friendly “Excel” format;

(3) An interactive “query” shall be designed to give results like (i) Given generator is meeting which loads and in what proportion, (ii) Given load(s) is met by which generators and in what proportion, (iii) Given DIC is using which transmission lines and in what proportion, (iv) Given transmission is serving which DICs and in what proportion etc.

(4) Implementing Agency shall provide sensitive data to the DICs with access control.

Gridco's view:

The Data Transparency & accessibility by DIC should be such that data retrieval method/ form should help DIC in further analysis & systematically decipher the transmission charge components/calculation part/statements without ambiguity and with due Traceability.

For example in current PoC regime it is observed that, though the implementing agency is providing the data in line with regulations, sometimes these data are found to be not at all user friendly or not even sufficient for further analysis and verification purpose at DIC end to take corrective measures if possible. Hence, IA may be mandated to provide information to DICs in a more user friendly and self- explanatory manner which shall be very helpful for further analysis.

Apart from the above data, Regulation 9(4) mention that while carrying out the load flow studies, the Implementing Agency may make minor adjustment in the generation and demand data, if required, to ensure load generation balance. Such changes done by IA in generation & demand data shall also need to be displayed on web portal of POSOCO & made available for DICs along with other information.

Further such data requirement by DICs to be reviewed by Hon'ble commission after implementation of Sharing regulation & if required necessary direction may be given to CTU & NLDC for providing additional data as required by DICs.

Comments/Views/Suggestion of GRIDCO:

For computation of Average Cost of conductors, a simpler method of calculation can be adopted as below. The table below shows the calculation for the Quarter 2016-17 Q1. The Indicative cost and the Ckt-km has been taken from CTU data. A Base value is determined considering the 400 kV D/C Quad moose as reference. Basing on this reference value the apparent Ckt-km of all other conductor configuration are determined. Then the MTC value is apportioned among each conductor configuration to get the Average cost.

Computation of Average MTC - a simpler method

Indicative Cost Levels for 1st Quarter of 2016-17 (As Provided by CTU)						**Average Cost (Rs per ckm)**	
Type of conductor	**Indicative Cost (Rs Lakh)**	**Cost/ Circuit (Rs Lakh)**	**Base Value**	**Ckt-km**	Ckt-km as per Base Value	Total MTC to be recovered through PoC	Avg. Cost (Rs/Ckm)
	a	**b**	**c= b/90**	**d**	e= c*d	f	g = f *e/ Total ckt-km
765 kV D/C	332	166	1.84	9,687	17,867	**15,75,04,11,038**	2,61,323
765 kV S/C	133	133	1.48	13,790	20,379		2,09,373
400 kV D/C Quad Moose	180	90	1.00	16,296	16,296		1,41,681
400 kV D/C Twin Moose	104	52	0.58	60,122	34,737		81,860
400 kV S/C Twin Moose	71	71	0.79	17,946	14,157		1,11,771
220 kV D/C	41	20.5	0.23	10,696	2,436		32,272
220 kV S/C	23	23	0.26	2,188	559		36,207
132 kV D/C	27	13.5	0.15	926	139		21,252
132 kV S/C	18	18	0.20	1,853	371		28,336
400 kV D/C Triple Snowbird	150	75	0.83	5,072	4,227		1,18,068
Total Ckt-km as per Base Value =					1,11,168		

The above calculation is done by excel sheet and seems to be much simpler. Moreover, the result is exactly identical to that of the calculation method adopted at present. Hon'ble Commission may consider to adopt the above calculation methodology, if found suitable.

GRIDCO reserves the right to offer additional views, if any, on or before Public Hearing on the above Draft Regulations.