



एनएलसी इंडिया लिमिटेड

(भारत सरकार का 'नवरत्न' उद्यम)

NLC INDIA LIMITED

(A 'NAVRATNA' Govt. of India Enterprise)

मुख्य महा प्रबंधक / वाणिज्यिक का कार्यालय

OFFICE OF THE CHIEF GENERAL MANAGER / COMMERCIAL



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Lr.No.CGM/Commercial/F-1133/Transmission Charges and Losses / 2019

Dt:28.12.2019

To

The Secretary,

Central Electricity Regulatory Commission,

3rd & 4th floor, Chanderlok Building,

36, Janpath Marg,

NEW DELHI - 110 001

Sir,

Sub: CERC –Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations 2019 - NLCIL comments -submitted - Reg.

Ref: Notification No.L-1/250/2019-CERC dt.31.10.2019.

Pursuant to the notification under ref. cited regarding Draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations 2019 in CERC website, inviting comments / suggestions/objections of the stakeholders, the comments of NLCIL is submitted vide Annexure enclosed.

The above may please be taken on record.

Thanking you,

Yours faithfully,

for **NLC India Limited.,**

General Manager / Commercial

Encl : As above

Annexure

NLC INDIA LIMITED

Draft CERC (Sharing of Interstate Transmission Charges and Losses) Regulations 2019.

CHAPTER 3 SPECIFIC CASES

REGULATION 11

CLAUSE (7)

“In case the generating station or unit(s) thereof has achieved COD and transmission system is delayed, the concerned transmission licensee(s) shall make alternate arrangement for dispatch of power in consultation with Central Transmission Utility at the cost of the transmission licensee(s).

Provided that till such alternative arrangement is made, the transmission licensee(s) shall pay to the generating station the transmission charges proportionate to Long Term Access for the transmission system which is delayed.”

Comments:

In the case of Generator not achieving COD, but, transmission lines are ready, the Generator is made to bear the Yearly Transmission Charges till the achievement of COD. Here the transmission licensee is protected from all the loss it would have suffered because of the Generator not achieving COD.

Whereas, in the case of Transmission lines not achieving COD and not able to provide alternate arrangements for evacuation, the Generator cannot generate at all and the loss for the Generator would be the AFC for the period till lines are made ready.

But, the draft Regulation provides compensation only in the form of transmission charges proportionate to Long Term Access for the transmission system which is delayed. Thus, the compensation provided for the Generator is not commensurate with the actual loss suffered by the Generator.

Any compensation provided to the affected party due to the default on the other party shall be commensurate with the loss suffered by the affected party.

In view of the above, it is humbly requested that the compensation to Generators whenever transmission lines are not ready may please provided in the form of AFC of the Station for normative availability of the Unit(s) for the period till evacuation facilities are made ready.

CLAUSE (9)

PROVISO 3 & 4

“Provided that where transmission element(s) have been declared COD before its SCOD on request of a generating station for drawal of start-up power, the generating station shall instead pay Yearly Transmission Charges for such transmission element(s) till the generating station achieves COD.

Provided further that Transmission Deviation Rate shall not be applicable for generating stations covered under clause(4) of this Regulation for drawal of start-up power.”

Comments:

The above Regulation while dealing with transmission charges payable by a Generator before achieving COD mentions only the drawal of startup power and does not mention anything about transmission charges for infirm power injection. At present transmission deviation charges are levied for infirm power injection. It is requested that no transmission charges for infirm power injection may be levied on the Generator.

