



भारत सरकार
Government of India
विद्युत मंत्रालय
Ministry of Power
उत्तर क्षेत्रीय विद्युत समिति
Northern Regional Power Committee

दिनांक: 21.08.2023

सेवा में / To,
Members of Commercial Sub-Committee (As per List)
वाणिज्यिक उपसमिति के सभी सदस्य (संलग्न सूचीनुसार)

विषय: वाणिज्यिक उप-समिति की 47वीं बैठक संबंधी सूचना।
Subject: Notice of 47th meeting of Commercial Sub-committee.

बैठक सूचना दिनांक 28.07.2023 के संदर्भ में। उत्तर क्षेत्रीय विद्युत समिति की वाणिज्यिक उप-समिति की 47वीं बैठक पुनर्निर्धारित है और 28 अगस्त 2023 को सुबह 11:00 बजे एनआरपीसी कॉन्फ्रेंस हॉल, कटवारिया सराय, दिल्ली में आयोजित की जाएगी। एजेंडा और अतिरिक्त एजेंडा-1 पहले से ही अवगत करा दिया गया है और एनआरपीसी वेबसाइट पर भी उपलब्ध है। आगे का अतिरिक्त एजेंडा-2 इसके साथ संलग्न है।

उक्त बैठक में भाग लेने की कृपा करें।

With reference to meeting notice dated 28.07.2023. **The 47th meeting of Commercial Sub-Committee of NRPC is rescheduled and is to be held on 28 August 2023 at 11:00 AM at NRPC Conference hall, Katwaria sarai, Delhi.** The agenda and additional agenda-1 is already being issued and available on NRPC website. Further additional agenda-2 is enclosed herewith.

Kindly make it convenient to attend the meeting.

-sd
(अंजुमपरवेज)
अधीक्षण अभियंता (वाणिज्य)

**ADDITIONAL AGENDA-2
FOR
47th MEETING OF COMMERCIAL SUB-COMMITTEE OF NRPC**

ITEM-1 Sensitization for use of PushP Portal (agenda by NRPC Sectt.)

- 1.1 PUSHp portal (<https://nationalsurpluspower.in/>) has been launched on 09th March, 2023 by Hon'ble Minister of Power and NRE. He stated that Portal would be a single window system providing services to diverse domains of all the entities involved and to reallocate and transfer the power in minimum time from one surplus entity to deficit entity.
- 1.2 The agenda was discussed in 64th NRPC meeting (held on 24.03.2023) wherein utilities were sensitized for use of PushP portal for Optimal Utilization of Resources & Reduction in cost of Power for Consumers.
- 1.3 13th NPC meeting (held on 05.07.2023), has highlighted that currently, 17 States are utilizing the portal. However, there is a lack of participation from the states of NR. It was also discussed that State Generating Stations (SGS) units with sufficient coal storage, under RSD, may participate on this portal for meeting the peak demand of other states and national grid.
- 1.4 A meeting was taken by Chairperson, CEA on 08.08.2023 and he highlighted that thermal generating units may leverage the facility of PushP portal. It will ensure capacity utilization of plants and at the same time may provide cheaper power to consumers as PushP portal facilitates power at regulated tariff. Further, the State will also be benefitted as corresponding fixed charge shall be transferred to the beneficiary.

Members may deliberate

ITEM-2 Request for exclusion of drawl of BBMB partner States from BBMB Stations, from the General Network Access (GNA) quantum worked out in CERC (Connectivity and GNA to the ISTS) Regulations, 2022 being implemented w.e.f. 01.10.2023 (Agenda by PSPTCL)

- 2.1 Hon'ble Central Electricity Regulatory Commission (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2022, wherein the deemed GNA quantum for each State was worked out based on the actual drawl of State during the period of FY 2018-19 to FY 2020-21 (also including the drawl of partner States from BBMB Generating Stations, for which all expenditure including O&M charges of BBMB are presently shared by all partner States including PSPCL/ Punjab). GNA quantum for the State of Punjab was worked out as 5497 MW.

- 2.2 PSPCL mentions that the LTA/MTOA quantum for the State of Punjab is presently being considered around 4300 MW for apportionment of ISTS charges, which is based on the actual LTA/ MTOA tie-ups/ Power Purchase Agreements (PPAs) executed by PSPCL. However, BBMB share of around 1132 MW was not included in this LTA/MTOA quantum of 4300 MW, as the O&M charges for BBMB were separately being paid by the BBMB Partner States to BBMB. The GNA quantum worked out by Hon'ble CERC for the State of Punjab (5497 MW) also includes the drawl from BBMB stations, which is required to be excluded for apportionment of ISTS charges.
- 2.3 The matter regarding exclusion of BBMB drawl from GNA quantum has since been raised by PSPCL/ Punjab at various forums such as during the online workshop held on 10.02.2022 for discussion on Draft CERC GNA Regulations 2021, subsequent comments/ objections submitted by PSPCL and Punjab SLDC on draft CERC GNA Regulations 2021 on 15.02.2022 and 20.02.2022 respectively, Punjab SLDC letter to CTU dated 13.09.2022, PSPCL letter to CTU dated 13.10.2022 (with copy to CERC), PSPCL submissions during Public Hearing of CERC GNA (First Amendment) regulations, 2023 held on 13.03.2023, PSPCL letter to CERC dated 14.03.2023, PSPCL's comments on draft revised procedures for implementation of Sharing Regulations (First Amendment), 2023 submitted to NLDC vide e-mail dated 24.03.2023 and PSPCL letter to NLDC dated 26.04.2023. However, the contention of PSPCL for exclusion of BBMB drawl from GNA quantum of partner States in GNA regulations has not been accepted so far.
- 2.4 Hon'ble CERC has considered the reduction in GNA quantum on account of waiver on account of drawl of power from Renewable Energy (RE) Sources under CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022, issued on 07.02.2023. Hon'ble CERC has also devised methodology to reduce the ISTS drawl (and GNA quantum) in case a State draws its power directly through intra-State transmission system from certain generating station under CERC (Connectivity and General Network Access to the inter-State Transmission System) (First amendment) Regulations, 2023. However, the contention/ stance of PSPCL for exclusion of BBMB drawl from GNA quantum of partner States are not being considered.
- 2.5 PSPCL mentions that Hon'ble CERC itself, while determining PoC charges vide its order dated 28.04.2017 had mentioned that "*The assets of BBMB and LTA in respect of BBMB shall not be included under PoC mechanism and a view on inclusion of these assets under PoC shall be taken after determination of final tariff of these assets*". Subsequently, while determining tariff for BBMB transmission systems for control period 2014-19, Hon'ble CERC vide its order

dated 09.01.2019 in Petition No. 16/TT/2017, had specifically decided that *“the O&M Expenses allowed in the order shall not be included in the PoC charges and shall be claimed by the Petitioner from the participating States in proportion to the allocation of power of BBMB”*. Further, similar matter was also brought up in kind notice of Hon’ble CERC by PSPCL vide petition no. 206/MP/2019 (wherein power grid claimed transmission charges for BBMB transmission system also, considering BBMB assets as part of ISTS system), same has been decided recently by Hon’ble CERC on 15.12.2022 in favour of PSPCL and accordingly, calculation of GNA quantum in case of partner States needs to be made in line with these orders.

- 2.6 The contention of PSPCL that no transmission charges should be applicable for drawl of power by partner States from BBMB projects, as expenditure (including O&M charges) for the same are being shared by the Partner States is valid and justified. For the same reason, the share of partner States from BBMB was exempted from levy of transmission charges in the prevailing regime (by excluding the same from LTA/ MTOA quantum/ allocation, used for sharing of ISTS charges) and Hon’ble CERC order dated 09.01.2019 in Petition No. 16/TT/2017 and order dated 15.12.2022 in Petition No. 206/MP/2019 are in consonance with the stance of PSPCL.
- 2.7 The provisions of GNA regulations and Sharing of ISTS Charges & Losses regulations issued by Hon’ble CERC stipulates replacement of LTA/ MTOA quantum with GNA quantum for the purpose of sharing of transmission charges for ISTS. As the LTA/ MTOA quantum / allocation, presently being used for sharing of ISTS charges, doesn’t include the BBMB share of partner States, the same needs to be excluded from GNA too, requested by PSPCL.
- 2.8 Without the exclusion of BBMB drawl from GNA quantum, PSPCL is likely to shell out additional amount of around Rs. 180 Crores on annual basis after implementation of GNA regulations i.e. w.e.f. 01.10.2023.
- 2.9 Aggrieved by the non-reduction of GNA quantum for the State of Punjab on account of drawl from BBMB, PSPCL has approached to Commercial Sub-committee for the purpose of apportionment of ISTS charges. The members of the Sub-Committee may deliberate and decide on the matter for excluding BBMB drawl from deemed GNA quantum of partner States like Punjab, so as to avoid repetition in levy of transmission charges for same transmission system and to save partner States from such financial implications on this account.

Members may deliberate

ITEM-3 Issue of Transmission Deviation charges imposed on RHPS and NJHPS (Agenda by SJVNL)

- 3.1 Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2020 was notified on 04.05.2020 with applicability from 01.11.2020 onwards. The relevant provisions of aforesaid Regulations are reproduced here as under:

Regulation (12): Transmission Deviation

(1) Transmission Deviation, in MW, shall be computed as under:

- (a) For a generating station, net metered ex-bus injection, in a time block in excess of the sum of Long Term Access, Medium Term Open Access and Short Term Open Access:*

Provided that for a hydro-generating station, overload capacity of 10% during peak season shall be taken into account.

(2) 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:

1.05 X (transmission charges of the State for the billing month in Rs.) / (quantum in MW of Long Term Access plus Medium Term Open Access of the State for the corresponding billing period X 2880)

- 3.2 Further, CERC vide notification dtd.07.02.23 has issued first amendment of 'Sharing of Inter-State Transmission Charges and Losses' Regulations, 2020, which is applicable from 01.10.2023 onwards. The relevant clauses of Regulation impacting Hydro power generating stations are as under:

10. Amendment to Regulation 12 of the Principal Regulations:

(1) Clauses (1) a n d (2) of Regulation 12 of the Principal Regulations shall be substituted as under:

“(1) Transmission Deviation, in MW, shall be computed as under:

For a generating station including ESS and captive generating plant, transmission deviation shall be net metered ex-bus injection, in a time block in excess of GNA of such entity

Provided that for a hydro-generating station, schedules for overload capacity as permissible under the Grid Code during peak season shall not be considered for computing the transmission deviation:

Provided further that transmission deviation charges shall not be levied for the quantum of over-injection for providing primary response by a generating station, subject to verification of such over-injection by concerned RPC:

Provided also that each RPC shall issue necessary guidelines for furnishing the data by the generating stations regarding their primary response.

3.3 *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:*

1.25 X (total transmission charges for all drawee DICs located in the State, (as calculated in accordance with Regulation 5 to 8 of these regulations) for the billing month in Rs.)/ (GNA and GNARE 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)."

The aforesaid CERC Sharing of Inter-State Transmission Charges and Losses Regulations and its first amendment, following is stipulated:

- Transmission deviation charges would be applicable on hydro generating stations on net metered ex-bus injection, in a time block in excess of the sum of Long-Term Access, Medium-Term Open Access and Short-Term Open Access from 01.11.2020 onwards.
- Provided that Hydro-generating station, schedules for overload capacity of 10 % as permissible under the Grid Code during peak season shall not be considered for computing the transmission deviation applicable from 01.11.2020 onwards.
- Provided that Transmission deviation charges shall not be levied for the quantum of over-injection for providing primary response by a generating station, subject to verification of such over-injection by concerned RPC applicable from 01.10.2023 onwards.

3.4 The relevant provisions of Central Electricity Regulatory Commission (Indian Electricity Grid Code) (Fifth Amendment) Regulations, 2015 are reproduced here as under:

(7) The first sentence of Regulation 5.2(h) of Part 5 of the Principal Regulations, shall be substituted as under:

"All coal/lignite based thermal generating units of 200 MW and above, Open Cycle Gas Turbine/Combined Cycle generating stations having gas turbines of more than 50 MW each and all hydro units of 25 MW and above operating at or up to 100% of their Maximum Continuous Rating (MCR) shall have the capability of (and shall not in any way be prevented from) instantaneously picking up to 105%, 105% and 110% of their MCR, respectively, when the frequency falls suddenly."

(8) The following shall be added at the end of Regulation 5.2 (h) of Part 5 of the Principal Regulations:

"For the purpose of ensuring primary response, RLDCs/SLDCs shall not schedule the generating station or unit(s) thereof beyond ex-bus generation corresponding to 100% of the Installed capacity of the generating station or unit(s) thereof. The generating station shall not resort to Valve Wide Open (VWO) operation of units whether running on full load or part load, and shall ensure that

there is margin available for providing Governor action as primary response.....

Provided that scheduling of hydro stations shall not be reduced during high inflow period in order to avoid spillage:

Provided further that the VWO margin shall not be used by RLDC to schedule Ancillary Services.”

3.5 Unquote:

In compliance of aforesaid Regulations, during lean season/less inflow period, RLDC giving schedule up to Ex -bus installed capacity to the Hydro generating stations by keeping margin up to 110% of the MCR of the generating stations or unit thereof, for getting primary response, when frequency falls suddenly in the Grid.

From the above, it can be inferred that there is a contradiction in both the Regulations viz Sharing of Transmission Charges and Losses and IEGC Regulations. In accordance with the provisions of IEGC Regulations, RLDC is giving schedule to the generating stations corresponding to the 100 % of the Ex-bus Installed capacity of generating stations during peaking hrs and margin of 10 % overloading is utilized for giving primary support by the generating station. However, as per the provision of Sharing of Transmission Charges and Losses Regulations, transmission deviation charges was levied to the generating station beyond ex-bus injection in a time block in excess of the sum of Long-Term Access, Medium-Term Open Access and Short-Term Open Access for giving primary support by the generating station.

After deliberation with CERC officials, the amendment in this regard has been issued by CERC on 07.02.23 by excluding the primary response of the generating stations from the transmission deviation charges, which is effective from 01.10.2023 onwards. However, in terms of CERC Sharing of Transmission Charges and Losses Regulations, transmission deviation charges more than crores of Rupees have been levied to NJHPS and RHPS from 01.11.2020 to till date by giving primary support to the Grid.

This matter may be referred to the Hon'ble Commission for providing relief to NJHPS and RHPS for the previous period (from 01.11.2020 to till date) in line with the first amendment of CERC Sharing of Transmission Charges and Losses.

3.6 In view of the above, deliberation on the aforesaid issue of Transmission Deviation charges imposed on RHPS and NJHPS by NRPC

Members may deliberate.