

# पावर सिस्टम ऑपरेशन कारपोरेशन लिमिटेड

(पावरग्रिड की पूर्ण स्वामित्व प्राप्त सहायक कंपनी)

## POWER SYSTEM OPERATION CORPORATION LIMITED

(A wholly owned subsidiary of POWERGRID)



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NLDC/CERC/ Dedicated

Dated: 30<sup>th</sup> Nov 2011

To,

The Secretary,  
Central Electricity Regulatory Commission,  
3<sup>rd</sup> and 4<sup>th</sup> Floor, Chanderlok Building,  
Janpath-110 001

**Sub: Dedicated transmission lines-need for a generic treatment of such lines in case the same is shared by two or more users or operates in parallel to the Inter State Transmission System (ISTS)**

### References:

- i. Letter no NLDC/CEA\_CTU/ dated 12<sup>th</sup> Sep 2011 from GM NLDC to CEA and CTU on dedicated transmission lines
- ii. Letter no NLDC/CERC dated 12<sup>th</sup> Sep 2011 from GM NLDC to Secretary CERC with copies to CEA and CTU on dedicated APL Mundra-Mahendergarh HVDC corridor.
- iii. Letter no NLDC/APL\_HVDC dated 19<sup>th</sup> Sep 2011 forwarding the gist of discussion held in the meeting on 9<sup>th</sup> Sep 2011 at NRLDC, New Delhi related to APL Mundra-Mahendergarh HVDC.
- iv. Letter no. POSOCO/Tr. Pricing dated 27<sup>th</sup> Sep 2011 from GM NLDC to Secretary, CERC regarding scheduling from NSPCL to Bhilai Steel Plant (BSP)/CSPDCL.
- v. Letter no NLDC/LTA/dedicated dated 4<sup>th</sup> Oct 2011 from GM NLDC to MEPL and SEPL with copies to CEA and CTU.
- vi. Petition no 205/MP/2011 filed by M/s Meenakshi Energy Private Limited (MEPL) before CERC and heard on 28<sup>th</sup> Nov 2011 for admission.

Sir,

Kindly refer to the above communications from NLDC, regarding dedicated transmission lines. As already brought to the notice of the Honourable Commission, at times the dedicated transmission lines which operate in parallel with the Inter State Transmission System (ISTS) or shared by more than one user can create some amount of difficulty while handling these in system operation. The difficulties could arise in the following areas.

- Control area jurisdiction.
- Scheduling, boundary metering and accounting.
- Sharing of transmission charges and losses for the ISTS and dedicated portion.
- Applicability of transmission losses while scheduling.
- Computation of transfer capability of the network.

contd/-

So far we have come across four such cases and the same is summarized at Annexe-1. In three out of four cases, the parties have approached the Honourable Commission. The Central Transmission Utility (CTU) has granted Long Term Open Access (LTOA)/Long Term Access (LTA) to over hundred generating stations (details at Annexe-II) involving a dedicated transmission line from the station to the nearest ISTS point. It is possible that considering Right Of Way (ROW) issues, more parties might get connected to the dedicated transmission system leading to similar issues.

It would therefore be desirable that the issues relating to dedicated transmission lines are addressed at the planning and regulatory level so that any subjectivity and uncertainty is averted towards the last mile viz. system operation. One possibility to address this issue could be to convert the dedicated lines to Inter State Transmission System (ISTS). Another possibility is the methodology of co-ordination centre as directed by the Commission vide its order dated 1<sup>st</sup> June 2011 in AD Hydro/Malana-II case. Any other arrangement such as the parties entering into a private arrangement and requesting RLDCs to accept such an arrangement may go against the legal provisions whereby RLDC's jurisdiction begins and ends at the interface point to ISTS. The CTU also grants connectivity at the interface point to ISTS.

It is therefore requested that the Honourable Commission may kindly formulate suitable guidelines for handling dedicated transmission system such as above so that uncertainty while handling the same in system operation is avoided.

Thanking you,

Encl: as above

Yours faithfully,



**(V. K. Agrawal)**  
**General Manager**

Copy to:

- 1) Member (PS), Central Electricity Authority, Sewa Bhawan, R. K. Puram, New Delhi-110 066.
- 2) Executive Director (Engineering-SEF), POWERGRID, Gurgaon.
- 3) Director (OM), Ministry of Power, Shram Shakti Bhawan, Rafi Marg, New Delhi-110 001.

## Annexe-I

## Cases related to dedicated transmission lines and difficulty in their handling in system operation

| S no | Utilities                        | Issues   | Status   |
|------|----------------------------------|--|--|
| 1    | AD Hydro/Everest Power Limited   | <p>AD Hydro granted connectivity to ISTS by the CTU through a dedicated 220 kV line connected to Nalagarh PG station. Subsequently another IPP (Malana-II) desired to get connected to this dedicated line located in hilly terrain. Issues regarding sharing of transmission charges and losses on the dedicated line portion could not be resolved by the parties.</p> <p>As the interconnection point of the dedicated line at ISTS location would be the reference point for all transactions, RLDCs found it difficult to recognize each entity on the dedicated line portion and requested the entities to set up a coordination centre.</p> | <p>Malana-II approached CERC which gave its order on 1<sup>st</sup> June 2011. Allowed to interconnect on the dedicated line. Parties directed to form a coordination centre for interacting with RLDCs for scheduling, metering and accounting.</p> <p>AD Hydro approached APTEL which has given an interim order dated 10<sup>th</sup> June 2011 directing RLDCs to account the two entities separately.</p> |
| 2    | NSPCL Bhilai (2 x 250 MW)        | <p>NSPCL Bhilai has a captive status also and there are four (4) 220 kV dedicated transmission lines from NSPCL Bhilai to Bhilai Steel Plant (BSP). This transmission system operates in parallel with the Inter State Transmission System (ISTS) through 400 kV Raipur (PG) substation. BSP and Chhattisgarh are claiming exemption from ISTS charges and losses while scheduling from NSPCL citing the dedicated transmission system.</p>  | <p>Since 1<sup>st</sup> Aug 2011 when WRLDC is scheduling NSPCL, ISTS losses are being applied for scheduling from NSPCL to BSP/Chhattisgarh. This has been protested by BSP and NLDC has flagged this issue before CERC vide letter dated 27<sup>th</sup> Sep 2011.</p> <p>It is reported that BSP has filed a petition before CERC.</p>  |
| 3    | APL, Mundra                      | <p>2 x 1250 MW, +/-500 kV HVDC bipole from Mundra in Gujarat to Mahendergarh in Haryana constructed as a dedicated line. This would be operating in parallel with the ISTS and influence ISTS flows. Issues such as treatment of this dedicated line in transfer capability determination, setting of power order, tripping of HVDC bipole arose along with control area jurisdiction, scheduling, metering and accounting issues.</p>   | <p>NLDC flagged the issue with CERC vide letter dated 12<sup>th</sup> Sep 2011. A meeting was held on 9<sup>th</sup> Sep 2011 between CEA, CTU, NLDC, NRLDC, WRLDC, NRPC, WRPC, SLDCs of Gujarat and Haryana. Gist of discussion held in this meeting forwarded to all as well as CERC on 19<sup>th</sup> Sep 2011</p>   |
| 4    | MEPL and SEPL in Southern Region | <p>The two parties have got connectivity and LTA through a common dedicated line to the ISTS at Nellore (PG) substation.</p> <p>As the interconnection point of the dedicated line at ISTS location would be the reference point for all transactions, RLDCs found it difficult to recognize each entity on the dedicated line portion and requested the entities to set up a coordination centre.</p>   | <p>NLDC has communicated to SEPL and MEPL vide letter dated 4<sup>th</sup> Oct 2011 with copies to CEA, CTU and CERC.</p> <p>MEPL has filed petition no 205/MP/2011 before CERC which was heard on 28<sup>th</sup> Nov 2011 for admission.</p>   |