

Sl.No.	Stakeholders/ Commenters Name	Clause as per draft Procedure/ Regulation	Stakeholders Comments	NLDC Remarks
1	Anoop Singh, CER, IIT Kanpur	<p>Losses</p> <p>3.1 (b) Solar based projects commissioned during 1.07.2017 to 31.12.2022 and Wind power-based projects commissioned during 3.09.2016 to 31.12.2022 which were awarded through competitive bidding with Power Purchase agreements have been executed for sale of power from such generation capacity to the distribution licensees for compliance of their Renewable Purchase Obligation (RPO).</p>	<p>Sale of power from such generation capacity to the distribution licensees for compliance of their Renewable Purchase Obligation (RPO), beyond RPO compliance of DISCOMs power schedule from RE generators should also be considered (as a part of ISre) while estimation of transmission losses. It should be clarified in the procedure.</p> <p>Further, it should be clarified that energy injected into the ISTS network by RE generators registered under the REC would not be considered while estimating transmission losses (as a part of ISre).</p>	<p>For computation of average ISTS losses, ISTS connected RE generation shall only be considered. Beyond RPO compliance, all ISTS connected RE generation will be considered while computation of losses. This has been clarified in the losses procedure in Para 3.0</p>
		<p>Losses</p> <p>3.2 In case the injection data of solar/wind generators is not available or in case pooled data of solar/wind generation is available where it is not possible to segregate the portion of solar/wind generation as applicable under (a) and (b) as above, ISre shall be considered as zero in such scenario.</p>	<p>For Computation of Transmission Losses in case of unavailability of injection data of solar/wind generators or in case pooled data of solar/wind generation, the procedure suggests that ISre shall be considered as zero. If ISre for such cases is considered to be zero, the denominator would be lower than actual, thus leading to underestimation of transmission losses as compared to the actual one. Once apportioned to the 'non-RE' transactions (drawals), this may lead to under-recovery of transmission losses in the system. How would such unrecovered loss be made good?</p>	<p>This is under review and would suitably be modified.</p>
		<p>Charges</p> <p>12.0 Information to be published by IA in Public Domain</p> <p>12.2 The above information can be viewed on the website of IA only after logging in. The username and password for this purpose can be generated through registration on the website.</p>	<p>Information to be published by IA in Public Domain (12):</p> <p>The proposed procedure mentions about accessibility of data only login to the portal. POSOCO/NLDC have so far lead by example by not only designing a useful portal but also proving unhindered access to the data, which is of high frequency nature. In the current age of IT, researchers, modelers as well as other users make use of data tools to compile the data for useful analytics and research. By placing login restrictions, the data access would be restricted and become a very tedious and laborious affair. This would seriously stifle research as well as analytics that has been helping the researchers as well as stakeholders. Such a step should at best be avoided especially as this only serves to cause hardship for data users (12.2). Such restriction may be adopted for any real time data that may be shared through the portal.</p>	<p>Login would be issued to all stakeholders once they register for access on the website. The requests received will be verified and validated and would be approved for receiving logins through website.</p>
			<p>In the absence of SEM data for estimating transmission charges, SCADA data can be used. Similar approach may be adopted in the case of estimation of transmission losses.</p>	<p>ISTS losses would be computed on the basis of SEM data. In case SEM data not available, the existing practices by RLDCs would be continued.</p>
2	Adani Transmission Limited	<p>Charges</p> <p>5.8 In case a generating station or unit(s) thereof has achieved COD and the Associated Transmission System is delayed, the concerned Inter-State transmission licensee(s) shall make alternate arrangement at its own cost for despatch of power of the generating station or unit(s) thereof in consultation with the Central Transmission Utility: Provided that till such alternate arrangement is made, the inter-State transmission licensee(s) shall pay to the generating station, the Yearly Transmission Charge corresponding to the quantum of Long Term Access for the period for which the transmission system has got delayed. Accordingly, total MTC under this sharing mechanism is to be adjusted in such case.</p>	<p>ATL would like to submit here that Hon'ble Central Commission is yet to notify the date for CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2020 to come into force. In the absence of the same, it is erroneous to include the above clauses which did not exist in the previous procedures.</p> <p>So, ATL requests to remove the proposed clause 5.8 & 5.9 from the Draft procedure for Computation and sharing of Inter-State Transmission System Charges.</p>	<p>The Caluses 5.8 and 5.9 were took into the procedure as per the Regulation notified by CERC. As soon as the Regulation come into force, all Clauses will be applied on the stakeholders.</p>
		<p>Charges</p> <p>5.9 In case of a transmission system where COD has been approved in terms of proviso (ii) of Clause (3) of Regulation 4 of the Tariff Regulations, 2014 or Clause (2) of Regulation 5 of the Tariff Regulations, 2019 or where deemed COD has been declared in terms of Transmission Service Agreement under Tariff based Competitive Bidding, the Yearly Transmission Charges for the transmission system shall be:</p> <p>a) paid by the inter-State transmission licensee whose transmission system is delayed till its transmission system achieves COD, or</p> <p>b) paid by the generating company whose generating station or unit(s) thereof is delayed, till the generating station or unit thereof, achieves COD, or</p> <p>c) shared in the manner as decided by the Commission on case to case basis, where more than one inter-State transmission licensee is involved or both transmission system and generating station are delayed."</p>		
3	Chhattisgarh		No Comments	NIL
4	Essar Power	<p>Charges</p> <p>8.1.1 (a) National Component-Renewable Energy:</p> <p>National Component- RE shall comprise of the Yearly Transmission Charges for transmission systems developed for renewable energy projects as identified by the Central Transmission Utility.</p>	<p>National Component-Renewable Energy:</p> <p>National Component-RE shall comprise of the Yearly Transmission Charges for transmission systems developed for renewable energy projects as identified by the Central Transmission Utility. The charges for this component shall be borne by Drawee DIC's.</p> <p>Rationale-</p> <p>As per the mentioned clause in the procedure, Transmission System developed exclusively for RE projects shall be borne by the Drawee DICs as well as by the Injecting DICs with untied LTA capacity. We would like to mention that the benefits from the RE projects are being taken by the Drawee DICs in order to meet their demand and fulfill their RPO obligation and hence the Transmission charges for the Transmission System developed for evacuation of power from RE projects need to be borne only by the Drawee DICs and should not be shared with the injecting DIC.</p>	<p>Clause is in line with Regulation.</p>
		<p>Charges</p> <p>8.4.3 (j) Where a dedicated transmission line has already been constructed or is under construction by an inter-state transmission licensee under coordinated transmission planning of the Central Transmission Utility, the transmission charges for such dedicated transmission line is to be paid by the concerned generating station to the inter-State transmission licensee (including deemed inter-State transmission licensee) from the COD of the dedicated transmission line till operationalization of LTA of the generating station. Circuit km of such dedicated transmission line shall be considered as "zero".</p>	<p>Where a dedicated transmission line is under construction by an inter-state transmission licensee under coordinated transmission planning of the Central Transmission Utility, the transmission charges for such dedicated transmission line is to be paid by the concerned generating station to the inter-State transmission licensee (including deemed inter-State transmission licensee) from the COD of the dedicated transmission line till operationalization of LTA of the generating station. Circuit km of such dedicated transmission line shall be considered as "zero".</p> <p>Rationale-</p> <p>Where a license has been granted for a dedicated line, it should form part of ISTS network and should be considered to be a part of the Basic Network. If at all this change has to be made, it should be made for future dedicated lines being constructed by an ISTS licensee. Further there are cases where a generator has relinquished its LTA due to non availability of PPAs in the market. Thus it would be unfair to load the generators with dedicated line charges, relinquishment charges and at the same time Short term Open access charges for its power injection.</p>	<p>Clause is in line with Regulation.</p>
5	Gujarat		No Comments	NIL
6	Kakrapar 1&2		<p>Energy meter readings are taken weekly by KAPS and being sent to WRLDC for billing. These readings are in the form of energy (Whr). Presently KAPS does not possess facility to provide peak block MW injection as required. Being old station, no SCADA / Continuous recording facility exist for ex bus injection in MW. In view of this weekly Energy meter readings shared with WRLDC may be used for peak block period injection calculation. In addition to this, it may be noted that KAPS-1,2 is a base load station and its injection remains constant throughout the day unless any transient occurs.</p>	<p>WRLDC shall devise a uniform process for all such cases.</p>
7	MP	<p>Collection of data</p> <p>Format II-B</p> <p>1. Format II-B is for commercial data containing state-wise YTC of Inter-Connecting Transformers (ICTs) planned for the drawal of power by the concerned state.</p> <p>2. Only sky coloured cells are to be filled-up.</p> <p>3. Date of Commercial Operation for only those lines which are commissioned during the billing period.</p>	<p>In "Format-II-B", it is to mention that in case if any ISTS generator is connected at 220kV bus of the 400/220kV Substation of ISTS network, the transformer installed in these substations could not be considered as exclusively planned for drawal of power. In view of this one more column "No. of feeders to ISTS Generators (if applicable)" is required to be inserted in format-II-B before "Total YTC" column.</p> <p>Further, all such transformers where injection of ISTS power at 220kV bus is involved should be considered as National Component and the YTC of these elements should be shared by all DICs in proportion of their quantum of Long Term Access and Medium Term Access capacities.</p>	<p>CTU shall identify only such transformers that are exclusively planned for drawal of power. YTC of all the rets of the elements shall be shared as per the procedure which is in line with the Regulation.</p>

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8	Tamilnadu	<p>Charges</p> <p>2.0 Scope</p> <p>2.1 This procedure will be applicable to the following categories of Designated ISTS Customers who use the ISTS:</p> <p>(a) Generating Stations/ Generating Units defined as regional entities in the IEGC, 2010 and any subsequent amendment made thereto.</p> <p>(b) ISTS Licensees and CTU and Deemed ISTS Licensees</p> <p>(c) Non-ISTS Licensees whose assets have been certified by RPCs as being used for inter-State transmission.</p> <p>(d) Any Bulk consumer directly connected with ISTS, and</p> <p>(e) Any other designated entity representing a physically connected entity as per clauses (a), (c) and (d) above.</p>	<p>The same may be modified as: 2.1 This procedure will be applicable to the following categories of Designated ISTS Customers as provided in Clause (j) of Regulation 2 of Sharing Regulations 2020 and as mentioned below:</p> <p>The user of any transmission element(s) of the Inter-State Transmission System (ISTS) and shall include</p> <p>i) generating station,</p> <p>ii) State Transmission Utility (STU),</p> <p>iii) distribution licensee including State Electricity Board or its successor company,</p> <p>iv) Electricity Department of State</p> <p>v) Non-ISTS Licensees whose assets have been certified by RPCs as being used for inter-State transmission.</p> <p>vi) Any Bulk consumer directly connected with ISTS, and</p> <p>vii) any other entity directly connected to the ISTS and shall include an intra-State entity or a trading licensee that has obtained Medium Term Open Access or Long Term Access to ISTS;</p> <p>Justification-</p>	Clause shall be reviewed and would suitably be modified.
		<p>Charges</p> <p>3.0 Notification of Peak Block by IA</p> <p>3.1 As per Regulation 2 (1) (r), Peak block is the block in which sum of net ISTS draws by all states/ regional entities is maximum. While identifying peak block, negative net ISTS drawal of any state/ regional entities shall be treated as zero.</p> <p>Charges</p> <p>5.0 Computation of ISTS Monthly Transmission Charges (MTC) by IA</p>	<p>3.0 Notification of Peak Block by IA</p> <p>3.1 As per Regulation 2 (1) (r) of the Sharing Regulation 2020, Peak block is the block in which sum of net ISTS draws by all states/ regional entities is maximum. While identifying peak block, negative net ISTS drawal of any state/ regional entities shall be treated as zero. After 5.1, 5.2 and 5.3, all the Clauses in Reg (13) of Sharing Regulations 2020 shall be included; In the proposed Procedure, the Clauses (2), (10) and (11) have been left out.</p> <p>Justification-</p> <p>The Detailed Procedure shall be in line with the Sharing Regulations 2020 and Tariff Regulations 2019.</p>	Clause 5.0 of the procedure shall be reviewed and the missed outs in the special cases as per Regulation (13) would suitably be incorporated.
			<p>A new proviso to deal with non-commissioning of upstream/ downstream to be included in the above section:</p> <p>In this regard, in Judgement dt: 18.01.2019 in APPEAL NO. 332 of 2016 & IA Nos.706 of 2017 & 699 of 2017, the Hon'ble APTEL has observed the absence of specific provisions in the Sharing Regulations to deal with situations where upstream/ downstream has not been commissioned as follows:</p> <p>"10.3 We further observe that these type of major issues ought to have been covered under Regulations by the Central Commission to plug the gaps, which would avoid litigations. The importance of the same was considered by the Central Commission at one point of time in its order dated 5.8.2015 and directed its staff for appropriate amendments in the Tariff Regulations, 2014. Till date no such modifications have been carried out by it in the Regulations. It is however, observed that there are many regulatory/ judicial orders of the Central Commission to deal with the situations like in the present case.</p>	<p>Should be reviewed and suitably incorporated after intimation and approval by CERC. (Potential clause that shall be considered in Regulation amendment)</p>
		<p>Charges</p> <p>12.0 Information to be published by IA in Public Domain</p> <p>12.1 Implementing Agency shall provide following information in public domain:</p> <p>a) The Basic Network, generation at nodes and drawal at nodes considered for the Base Case and the load flow results, for each billing period and Assumptions if any;</p>	<p>The data shall be furnished in executable format compatible to the software for calculation of charges.</p> <p>Justification-</p> <p>It is essential to share the software and data in compatible format with all DICs, so as to verify the correctness of the computation.</p>	Software will be tested and validated as per the Regulation before it put to use. The formats that are furnished in the procedure would be made compatible with the software.
9	GRIDCO	<p>Charges</p> <p>9.2 Transmission charges for STOA transactions shall be shared by generating stations and embedded entities located in the state, as per the last published STOA Rate for the State.</p>	<p>As per Sharing Regulations 2020, Clause 11(3), the Transmission Charges for STOA transactions shall be reimbursed in the following billing month to the State in which such entity is located. In view of the above, it may be clarified regarding the timeline of collection of STOA charges and the entity responsible for such collection of STOA Charges from the embedded intra-state customers.</p> <p>Further, it may be clarified whether the method of calculation of STOA Rate as given under Clause 9.1 of Draft Procedure is final, or the State Regulatory Commission has any role in the determination of STOA Rates for the embedded entities of a State.</p>	<p>The times lines for collection and disbursement of STOA charges is not under the ambit of the procedures framed by Implementing agency. The timelines for collection and disbursement shall be mentioned in the relevant procedure that would be framed by CTU as per Regulation 23(3).</p> <p>STOA computation as mentioned in the procedure is in line with Regulation and is final and shall be applicable to embedded entities also. SERC role was not mentioned in the Regulation with respect to STOA rates of embedded entities.</p>
		<p>Charges</p> <p>12.0 Information to be published by IA in Public Domain.</p>	<p>The following information may also be published relating to AC Usage Based Component.</p> <p>(i) Node-wise PoC Charges for all the nodes of each DICs separately.</p> <p>(ii) Allocated cost of each Transmission Line pertaining to a DIC.</p> <p>(iii) Transmission Charge of all the Transmission Lines (from Bus to Bus) on all India basis.</p> <p>(iv) A.P./M.P. results of all load points/ Generation points of each DIC.</p>	Relevant information shall be made available on interactive query based application.
10	NTPC	<p>Charges</p> <p>8.4.3</p> <p>(h) If CoD of a generating station or unit(s) thereof is delayed and the associated transmission system achieved CoD, transmission charges for associated transmission system corresponding to LTA granted for the generating station or unit(s) thereof, which have not achieved CoD is to be billed to the generating station. Circuit km of such associated transmission lines shall be considered as "zero".</p>	<p>h) If CoD of a generating station or unit(s) thereof is delayed and the associated transmission system achieved CoD, Yearly transmission charges for associated transmission system corresponding to LTA granted for the generating station or unit(s) thereof, which have not achieved CoD is to be billed to the generating station. Circuit km of such associated transmission lines shall be considered as "zero".</p> <p>Remarks-</p> <p>The same may please be changed in line with The Regulation which provides as follows: Reg. 18(3) - Where COD of a generating station or unit(s) thereof is delayed and the Associated Transmission System has achieved COD, which is not earlier than its SCOD, the generating station shall pay Yearly Transmission Charges for the Associated Transmission System corresponding to Long Term Access granted for the generating station or unit(s) thereof, which have not achieved COD.</p>	Clause shall be reviewed and suitably be modified
		<p>Charges</p> <p>3.4 The peak block once declared on first day of the billing period shall be treated as final and shall not be reviewed later based on the SEM data available for the remaining period.</p>	<p>The peak block once declared on first day of the billing period shall be treated as final and shall not be reviewed later based on the SEM data available for the remaining period.</p> <p>Remarks-</p> <p>As per Regulation 24(2), peak block is to be declared for billing period on first day of billing month.</p>	<p>Peak block will be declared for billing period and on first day of the billing month.</p> <p>The typo error shall suitably be modified in Procedure.</p>
		<p>Charges</p> <p>3.0 Notification of Peak Block by Implementing Agency (IA)</p> <p>3.4 The peak block once declared on first day of the billing period shall be treated as final and shall not be reviewed later based on the SEM data available for the remaining period.</p>	<p>Once the SEM data is available and if there is a major discrepancy(>10%) between the SEM data and SCADA data, a provision for review may be kept there.</p>	Issue of major discrepancies between SEM data and SCADA data once SEM data of remaining part is available shall be addressed suitably in Procedure.
		<p>Charges</p> <p>4.0 Data Acquisition and Preparation of Base case for computations</p> <p>4.5 In case of major discrepancy of information provided by DICs with reference to SEM/ SCADA data, concerned DICs shall be informed for giving proper explanation for the discrepancy in a specific time period. If DIC fails to do so, IA shall consider the data as per the alternate sources.</p>	<p>What are the other alternate sources may please be clarified.</p>	<p>The alternate sources were not already mentioned in the procedure at suitable clauses. For clarity, this shall also be mentioned in clause 4.5 of the procedure.</p> <p>The alternate sources could be data projection based on historical data or recently available updated TTC/ATC base case with RLDCs that is built based data sent by states/entities</p>
		<p>Charges</p> <p>4.6 The data provided by the DICs shall be as per the formats stipulated by the Implementing Agency. All drawee DICs shall also submit generation from their own generating stations for the peak block during the billing period to the Implementing Agency to prepare the Base Case for load-generation balance.</p>	<p>If there is any discrepancy in information provided by DICs with respect to their own generation the IA may seek for proper explanation from the concerned DIC. If the DIC fails to provide so within a specific time period, data from other alternate sources may be taken.</p>	This is already covered in the clauses drafted in procedure.

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11	ERPC	<p>Charges</p> <p>8.4 Computation and sharing of AC System Component (ACC) of Transmission Charges</p> <p>8.4.3 Computation of share of Transmission charges under AC usage-based component</p> <p>m) The load flow results and usage-based cost of each line of the basic network corresponding to peak block during billing period shall form the basis of calculation of transmission charges and the input to the computation software. The output of the software shall be the computed nodal</p> <p>Charges</p> <p>10.0 Determination of Transmission Charges for DICS</p> <p>10.8 The existing practice of sending processed metered data from all SEMs for DSM billing shall be continued for issuance of Regional Transmission Deviation Account. 10.9 RLDCs shall send the details of short-term open access to respective RPCs for issuance of Regional Transmission Deviation</p> <p>Charges</p> <p>12.0 Information to be published by Implementing Agency in Public Domain</p> <p>12.1 Implementing Agency shall provide following information in public domain:</p> <p>a) The Basic Network, generation at nodes and drawl at nodes considered for the Base Case and the load flow results, for each billing period and Assumptions if any;</p>	<p>Software used for the above calculation may be made available with all the DICs and training/workshop may be conducted by Implementing Agency on this new methodology for determination of Transmission Charges & Losses to have a better understanding.</p> <p>The data format furnished by RLDCs should be uniform in nature. Besides, frequent change in data formatting may please be avoided so as to have a hassle free experience in doing the accounting by the RPCs.</p> <p>In order to ensure load generation balance, sometimes Implementing Agency (IA) may make minor adjustment in the generation and demand data. Such changes done by IA may be made available on web portal of POSOCO.</p>	<p>Software shall not be made available to all DICs. The administrative access to the software shall only be lied with IA. DICs shall only be having access to web based application.</p> <p>May be considered.</p> <p>Relevant information will be made available and DICs shall be having access to view and download the data.</p>
12	Powerlinks Transmission	<p>Charges</p> <p>3.0 Notification of Peak Block by IA 3.1 As per Regulation 2 (1) (r), Peak block is the block in which sum of net ISTS draws by all states/ regional entities is maximum. While identifying peak block, negative net ISTS drawal of any state/ regional entities shall be treated as zero.</p> <p>Charges</p> <p>5.8 In case a generating station or unit(s) thereof has achieved COD and the Associated Transmission System is delayed, the concerned interState transmission licensee(s) shall make alternate arrangement at its own cost for despatch of power of the generating station or unit(s) thereof in consultation with the Central Transmission Utility. Provided that till such alternate arrangement is made, the inter-State transmission licensee(s) shall pay to the generating station, the Yearly Transmission Charge corresponding to the quantum of Long Term Access for the period for which the transmission system has got delayed. Accordingly, total MTC under this sharing mechanism is to be adjusted in such case.</p> <p>Charges</p> <p>7.3 As per Regulation (9) (4) of the Sharing Regulations 2020, IA may moderate the nodal injection and withdrawal for each DIC so as to maintain load generation balance in the representative base case in consultation with NLDC/ RLDCs/ RPCs, if required, based on the historic injection and demand data available with them.</p> <p>Charges</p> <p>8.4.3 Computation of share of Transmission charges under AC usagebased component ...</p> <p>(l) The usage-based line cost shall then be attributed to various nodes as per their utilization factors of the line in proportion to the nodal injection/ demand to arrive at the nodal transmission charges.</p> <p>Charges</p> <p>9.1 State-wise Transmission charges for Short Term Open Access shall be calculated as follows:</p> <p>STOA Rate for the State (in Paise/kWh) = (Transmission charges of the state for the billing month (in rupees)) / (7200 x (LTA and MTOA (in MW) of the State for the corresponding billing period))</p> <p>Charges</p> <p>10.3 Inter-State Generating Stations connected at 220kV and below voltage level shall be charged at the zonal charges determined for the state where such generators are physically located.</p>	<p>It is proposed that negative net ISTS drawal of any state/ regional entities should not be treated as zero as there is no such Clause/ reference in the Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses Regulations, 2020). This might lead to imbalance between Generation and Demand.</p> <p>It is proposed that the total MTC (Monthly Transmission Charges) should not be adjusted. The relevant extract of the mentioned Regulations in this regard is as follows: 13 (8) In case a generating station or unit(s) thereof has achieved COD and the Associated Transmission System is delayed, the concerned inter-State transmission licensee(s) shall make alternate arrangement at its own cost for despatch of power of the generating station or unit(s) thereof in consultation with the Central Transmission Utility. Provided that till such alternate arrangement is made, the interState transmission licensee(s) shall pay to the generating station, the Yearly Transmission Charge corresponding to the quantum of Long Term Access for the period for which the transmission system has got delayed. Hence, it is proposed that adjustment of MTC be removed because it is a settlement between the concerned Transmission Licensee and the Generator.</p> <p>The word 'including' may be inserted in the clause 7.3. The clause may be amended as follows: 7.3 As per Regulation (9) (4) of the Sharing Regulations 2020, IA may moderate the nodal injection and withdrawal for each DIC so as to maintain load generation balance in the representative base case in consultation with NLDC/ RLDCs/ RPCs, if required, including, based on the historic injection and demand data available with them.</p> <p>The subclause (l) of clause 8.4.3 may be amended as follows: (l) The usage-based line cost shall then be attributed to various nodes as per their utilization factors of the line in proportion to the nodal demand/ untied injection to arrive at the nodal transmission charges. This clause is to be modified in line with the Regulation 9(7) and 9(8) of the mentioned Regulations.</p> <p>The denominator of the formulae of STOA Rate for the State (in Paise/kWh) under Clause 9.1 may be modified as follows: (No. of Days in the respective month) x 24 x (LTA and MTOA (in MW) of the State for the corresponding billing period)</p> <p>In the Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses Regulations, 2020), there is no concept of 'Zonal Charges'. Hence the Clause 10.3 and Format - I may be modified accordingly.</p>	<p>The negative ISTS drawal occurs in rare cases and for only one or two entities. Making zero would not have any significant impact on deciding peak block. Further, treating negative drawals as zero while determining peak block was mentioned in explanatory memorandum issued for draft Sharing Regulations 2020.</p> <p>Clause shall be reviewed and suitably be modified</p> <p>Clause shall be reviewed and suitably be modified</p> <p>Usage based line cost shall be attributed to various nodes as per the utilization factors of the line in proportion to the nodal injection/ demand to arrive at the nodal transmission charges. However, in case of generators, cost allocation would be only among the set of generators having untied LTA capacity. The word untied not suits in this clause.</p> <p>The formula considered for calculation of STOA charges is in line with the Regulation.</p>
		<p>Collection of data</p> <p>5.1 As per Regulation 24(2), Peak block for the billing period shall be published by IA, on its website, on the first day of the billing month.</p>	<p>May be modified as follows:- 5.1 As per Regulation 24(2), Peak block for the billing period shall be published by IA, on its website, on the first day of the month following the billing period.</p>	<p>Yes, the correction is required. Clause shall suitably be modified</p>

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		<p>Collection of data</p> <p>6.3.2 The Basic Network shall comprise of the entire electricity system, electrical plants and/ or transmission lines at voltage levels of 110 kV and above and all the generators connected upto 110 kV level corresponding to Peak Block identified and published by IA</p>	<p>The date of publication of the Basic network corresponding to peak block may be specified in the procedure. This would enable adherence to the timelines & ensure timely raising of transmission bills. Further, the procedure should also publish the information pertaining to ISTS licensees alongwith their YTC which has been considered in the processing of the sharing transmission charges and losses. In case any elements are not considered reasons for the same may also be published by IA within a stipulated date which may also be mentioned in the procedure. This would enable the Tr. Licensees to be assured that their elements have been considered in the making of sharing charges / losses regulations.</p>	<p>Yes, making transparency of information at each stage is under review. For smooth and dispute free implementation of Sharing Regulations, The interim documents such as final basic network that would be used for computation, MTC considered for computation of transmission charges for a particular month etc. would be available to D/Cs/ Licensees for viewing and comment if any, before carrying out computation process in any month following billing period.</p>
		<p>Collection of data</p> <p>6.4.3 The line wise YTC of the entire ISTS network along with the breakup of substation cost shall be provided by the InterState Transmission Licensees, Deemed ISTS Licensees and Non-ISTS Licensees whose assets have been certified by RPCs as being used for inter-State transmission. The YTC of the substations shall be apportioned to the lines whose cost is to be shared under the sharing methodology".</p> <p>6.4.4 " In case the sub-station and lines belong to different transmission licensees, and if the substation cost is to be recovered, such cost shall be apportioned only to those lines whose cost is to be recovered through the sharing methodology</p>	<p>Method of apportionment of YTC to the lines based on indicative cost has been explained in the clause 8.4 of IA procedure for computation and sharing of ISTS charges. Due to non- availability of separate tariff for sub-station components, implementation of clause 6.4.3 and 6.4.4 is complex and difficult to implement. CERC vide order dated 4.4.2011 (Removal of difficulty in implementation of Sharing Regulations 2010) also appreciated the above difficulty and thereafter methodology as provided in Clause 8.4 of IA procedure for Computation and Sharing of ISTS charges is being used in the existing sharing mechanism. Further, in case of TBCB, it is to be recognized that the break up of YTC to the extent available in the TSA (bidding document) can be provided. Any further break-up cannot be provided by TBCB licensees.</p> <p>Therefore furnishing of information as per Clause 6.4.3 & 6.4.4 may be reviewed, including the references in "Instructions for filling Format – I".</p>	<p>Yes, clause needs a review and will suitably be modified. The licensees are not needed to apportion the cost of substations to the lines. It would be done internally by the software while doing computation process. Same is being followed in the existing methodology.</p> <p>The relevant clauses needs to be modified accordingly.</p>
		<p>Collection of data</p> <p>6.4.7 In case any new transmission element has declared COD on last day of the billing period, the entity shall submit to the IA, network data, date(s) of commercial operation of the new transmission element and Yearly Transmission Charge of such transmission element in the format stipulated by the Implementing Agency by the first day of the billing month.</p>	<p>May be modified as follows:- 6.4.7 In case.....by the Implementing Agency by the first day of the month following the billing period.</p>	<p>Yes, Clause to be modified accordingly.</p>
		<p>Collection of data</p> <p>6.4.9 The Yearly Transmission Charges (YTC) of the new transmission elements, whose charges are to be recovered for which petitions for approval of Transmission Tariff have been filed in the appropriate Commission and for which provisional tariff have been given by the Commission and COD of respective elements already achieved, shall also be submitted by the respective inter-State/ deemed interState transmission licensees/ nonISTS Licensees whose assets have been certified by RPCs.</p>	<p>Instances are very common wherein the COD of the transmission asset is achieved in the billing period and the tariff petitions have been filed, however, the provisional / final tariff is yet to be approved by the Commission. IA to specify whether details of such assets without tariff are required to be furnished ?</p>	<p>No, IA shall only consider the approved tariff of assets by CERC either it is given as provisional or final. The same has been drafted in 6.4.9.</p>
		<p>Collection of data</p> <p>6.5.3 "As per Regulation (5) (2), CTU shall identify and furnish the details of YTC for transmission Systems developed for Renewable energy projects to IA."</p>	<p>CTU may not have YTC of all RE transmission projects/system developed by ISTS Licensees. CTU can provide the technical details of the RE systems, however, the YTC is required to be obtained from the ISTS Licensees only, if it is to be given by CTU. Further, in case of cost plus projects, the approval of YTC may still be pending at the time of the transmission system achieving COD and the status of YTC is known to the concerned ISTS Licensee only. Accordingly, CTU will explore the options to compile the information.</p>	<p>CTU shall be provided access to the web based application to view the asset details furnished by the licensees. This could help CTU in compiling and furnishing the YTC of RE projects to IA.</p>
		<p>Collection of data</p> <p>6.5.4 CTU shall provide indicative cost of the transmission lines for each conductor configuration.</p>	<p>Not possible to provide indicative cost for each conductor configuration and hence the clause may be modified as: "6.5.4 CTU shall provide indicative cost of the transmission lines for available conductor configuration" IA & CTU to discuss further to finalize the configurations for which indicative cost / YTC is required.</p>	<p>It needs to be discussed and finalized with CTU. Even in the existing computation methodology, CTU furnishes indicative cost of certain conductor configuration, not all.</p>
		<p>Collection of data</p> <p>6.5.5 (ii) & 6.6 In case, separate YTC is not available for such transmission elements of Regional Component & Transformer component, it shall be calculated based on indicative cost and the details shall be furnished to IA.</p>	<p>IA may provide details required. It needs to be clarified if only separate YTC as calculated based on indicative cost is to be provided or the details regarding calculation involved is also to be provided. Further, most of TBCB systems have a single tariff for lines and substations where break-up may not be available. In such case, CTU needs to compute the YTC of Transformer component and relevant Regional Components of each such TBCB substation. IA & CTU to discuss further in the matter.</p>	<p>Here details required is meant only with respect to the YTC and other information as mentioned in the specific formats for data collection. However, the indicative cost considered may also be shared componentwise with IA.</p>
		<p>Collection of data</p> <p>7.0 Timeline for submission of data for each billing period: a) Basic Network Data by D/Cs: with in first 7 days of each billing month b) YTC to be submitted by licensees: by the end of the billing period c) Nodal injection and Demand Data by D/Cs: with in first 7 days of each billing month d) LTA/ MTOA details and other data as detailed in Para 6.5 by CTU: with in first 7 days of each billing month</p>	<p>"billing month" may be replaced by "the month following the billing period"</p>	<p>Yes, Clause to be modified accordingly.</p>
		<p>Collection of data</p> <p>8.0 Formats</p> <p>General :</p> <p>Format I-A / I-B /I-C</p> <p>The devised Formats envisage all types of Licensees to furnish information for all transmission lines and substations alongwith break-up of element-wise YTC details, as per the requirement indicated in the Clauses 6.4.3 and 6.4.4 of the IA procedure of "Collection of data & information for determination of ISTS charges and losses"</p>	<p>Following are the constraints in furnishing the data & information as per Clauses 6.4.3. and 6.4.4 of the procedure :-</p> <p>For Cost Plus projects :</p> <ol style="list-style-type: none"> 1. There are old Transmission projects for which the Cost of the assets is true-up and combined over various tariff blocks of the life of the assets and the YTC is also approved on a consolidated basis for the total project and hence no YTC is available for each tr.lines and each substations of the Project separately. 2. Further, there are many instances wherein the tariff of lines and substations is clubbed for a common DOCD and a single tariff is approved by the Commission and no break-up of tariff is available. 3. In view of the above reasons, details of total cost and average cost as sought in the formats may not be feasible. <p>For TBCB Projects :</p>	<p>The same may be followed as in the existing practice. In case YTC approved on consolidated basis for total project or for a pool of assets, the available YTC mentioning the details of pooled assets is to be furnished.</p>

Sl.No.	Stakeholders/ Commenters Name	Clause as per draft Procedure/ Regulation	Stakeholders Comments	NLDC Remarks
13	CTU		<p>4. Usually, a single contracted tariff is available in the Tariff table of the approved TSA for the total project comprising of lines and substations together and break-up of tariff may not be available in all the cases.</p> <p>5. Further, as sought in the formats, the total cost of the projects and average cost may not be available for TBCB projects and tariff is only approved in the TBCB projects. Keeping in view the above difficulties, furnishing of line-wise and substation-wise YTC, cost of asset and average cost of assets may not be feasible.</p> <p>IA may review and simplify the mechanism of computation of AC-Usage based component and AC-Balance component using the practically available YTC data to be furnished by the Licensees and Indicative cost details to be furnished by CTU. Further, the requirement of data may be split into two sets viz.</p> <p>(i) Technical data which is a one time requirement and (ii) Commercial YTC data which may change over a period of time. (Adopting the existing POC sharing mechanism for the AC-Usage based component with required modifications as per the new Regulations eg. Usage of SIL of lines in the computations which is new now etc., may be an option, which may be reviewed by the IA for easy implementation). CTU and IA may need to discuss further in finalizing the formats for required data. Further, for better clarity an illustration has been provided at Annexure-A. Meanwhile, the format-wise comments are being furnished for indicated formats in the present form.</p>	It is seen that technical information provided needs corrections in the parameters at times due to typo/ inadvertent errors. Therefore, an option will be provided to licensees through web based application in which the details of assets furnished in the previous month would be carried over to the next month. A licensee would be able to modify/ add the data while submitting the data for current month.
		Collection of data 8.0 FORMAT-I-A (By Licensees),	Transmission lines for each conductor configuration at each voltage level shall be allocated uniform charges based on the indicative cost per circuit kms for a transmission line for each conductor configuration at each voltage level as furnished by CTU. Hence in this format "Total cost" and "Average cost fields" proposed to be submitted by Licensees appear to be redundant. Licensees are required to submit only First Three Columns namely Voltage Level, Conductor Type and Ckt Kms only in this format.	To be reviewed and modified accordingly
		Collection of data 8.0 FORMAT – I-B and I-C (By Licensees)	Line-wise / Substation-wise YTC details may not be available for all the transmission lines and substations, as explained above. Where composite tariffs are available for the projects, indicative tariffs may have to be considered. Further, as per TSA of TBCB projects, generally a single tariff may be available for the substation and lines put together. In such cases, break-up may not be feasible and indicative tariffs furnished by CTU may have to be considered. Further, technical and commercial data may be segregated for ease of communicating the data every month by the Licensees, as explained above.	Repeated. Already made a remark above.
		Collection of data 8.0 FORMAT-II-A (By CTU)	Format appears to be requiring FACTS and its sub-devices data only. The column with heading "FACTS type" may be replaced with "Equipment and Type". Technical and Commercial YTC data may be segregated. Additional Column for YTC data, whether approved tariff / indicative tariff may be inserted.	Shall be reviewed and modified accordingly. Column for YTC data is already existed.
		Collection of data 8.0 FORMAT-II-B (By CTU)	Technical and Commercial YTC data may be segregated. Additional Column for YTC data, whether approved tariff / indicative tariff may be inserted.	Column for YTC data is already existed.
		Collection of data 8.0 FORMAT- III-A to III-H (BY Licensees/DICs)	<p>The data requirement is mainly technical data, comprising huge quantum of information, and is a one time requirement. Further, Licensees may not be able to provide some technical information viz. SIL / Thermal loading / Emergency loading limit etc. It is proposed that IA and CTU may discuss further and finalize the technical data to be furnished by the Licensees / DICs / CTU.</p> <p>The availability of system during the Peak block can be determined by NLDC only since the details of Peak Block of the system and the availability of the system are with the RLDCs only.</p>	<p>As made a remarks in the above comments, Licensees/ DICs shall furnish data in each month. However, there shall be provision in the web based application to carry forward the data submitted in the last month for view and modification by the licensee/ DIC for submission in the current month. Thus the issue of furnishing huge quantum of information would already be addressed.</p> <p>Peak block would be notified by NLDC on the first day of the month followed by billing period. Thus, Licensee can refer to the information of peak block provided by NLDC and can share the information of the service status of the lines during the peak block as mentioned in the respective data formats.</p>
		Collection of data 8.0 FORMAT – IV A to IV-B	To be commented by DICs.	NA
		Charges 3.3 As per Regulation 24(2), Peak block for the billing period shall be published by IA, on its website, on the first day of the billing month . 3.4 The peak block once declared on first day of the billing period shall be treated as final and shall not be reviewed later based on the SEM data available for the remaining period."	<p>As the billing for a billing period happens in the second following month as per the Sharing Regulations, Clause 3.3 and Clause 3.4 may be modified as follows:-</p> <p>"3.3 As per Regulation 24(2), Peak block for the billing period shall be published by IA, on its website, on the first day of the month following the billing period ."</p> <p>"3.4 The peak block once declared on first day of the month following the billing period shall be treated as final and shall not be reviewed later based on the SEM data available for the remaining period."</p>	Yes, clauses need to be modified accordingly.
		Charges 4.10 "The transmission system declared under commercial operation on or before the last day of the billing period shall be considered for computation of transmission charge for a billing month. However, Basic Network shall be considered as in the peak block of the billing period.	May be modified as :- "The transmission system declared under commercial operation on or before the last day of the billing period shall be considered for computation of transmission charge for a billing period. However, Basic Network shall be considered as in the peak block of the billing period.	Yes, clause need to be modified accordingly.
Charges 5 Clauses 5.4 to 5.10 (Clauses 5.4 and 5.6 are repetitive)	Implementing Agency has reproduced the clauses of Sharing Regulations, 2020 pertaining to mismatch cases as it is available in the regulations. Since these clauses are already part of the Regulations and may be subjected to a change in future, they need not be repeated in the Detailed procedure. Instead, it can be mentioned that "The cases of mismatch in generation and transmission systems shall be dealt as per the provisions of Regulation 13 (Treatment of transmission charges and losses in specific cases) of the Sharing Regulations, as amended from time to time."	The special cases mentioned in the Regulation is not only related to mismatch in COD of generation and transmission systems but also on various other issues. It was already observed by IA that 3 nos. of cases are missed to brought in the procedure as in the Regulation. All the special cases shall be reviewed again and suitably be incorporated.		

Sl.No.	Stakeholders/ Commenters Name	Clause as per draft Procedure/ Regulation	Stakeholders Comments	NLDC Remarks
		<p>Charges</p> <p>10.6 Implementing Agency shall provide the following information to RPC as per Format I of this procedure: a) Approved Withdrawal/ Injection (MW) data for each month based on the allocation from central sector generating stations received from RPCs and LTA/MTOA details received from CTU. b) Transmission charges (in Rs) for DICs.</p>	<p>Format –I does not capture the component-wise breakup of transmission charges and may be modified as per enclosed Annexure- B so that component wise breakup is published by RPC in the RTA. The above also allows the fulfillment of Clause 12.1 (h) which indicates that IA shall provide information as "Transmission charges payable by each constituent for the billing month along with component-wise break-up."</p>	<p>As suggested 10.6 (b) shall be modified for more clarity. Each RPC shall be having access to web based application to view and download the required information as mentioned in the procedure.</p>
		<p>Charges</p> <p>12 Information to be provided by Implementing Agency in public domain :</p>	<p>Formats in which NLDC would publish information may be given in the procedure for obtaining comments from stakeholders including DICs, Transmission licensees, CTU etc.</p>	<p>As per the Regulation, the information to be provided in the public domain is clearly mentioned in the Regulation and the same has been brought in the procedure. A query based interactive application to view and download the results shall be developed by IA through which an user can view and download the required data as per the query.</p>
		<p>Charges</p> <p>12.1 (e) YTC detail (Information submitted by the transmission licensees covered under the Regulation and computation by Implementing Agency);</p>	<p>May be modified as :- "YTC detail (Information submitted by the transmission licensees covered under the Regulation and computation by Implementing Agency) besides confirming to CTU in writing for the purpose of disbursement of charges to Licensees."</p>	<p>The YTC detail furnished by licensees along with the YTC considered by IA for computation shall be visible to the users from the web based application. CTU shall also be having access to web based application to view and download the required data as mentioned in the procedure.</p>
		<p>Charges</p> <p>12.1 (g) Detailed calculations of indicative cost for arriving at the average cost in respect of each transmission line;</p>	<p>For providing clarity, clause may be modified as : "Detailed calculations for arriving at the average cost in respect of each transmission line using indicative cost;"</p>	<p>Clause to reviewed and modified accordingly</p>
		<p>Charges</p> <p>Annexure-I : Process Chart</p>	<p>List and YTC for drawl ICT is to be provided by CTU. It is not shown in the Process chart and may be incorporated.</p>	<p>To be reviewed and incorporated. In any case, there is additional information needed to be furnished by CTU in order to handle special cases mentioned in the Regulations. In the process chart only vital information is shown.</p>
		<p>Collection of data</p> <p>Illustration and Proposal on Format I-A / I-B /I-C</p> <p>As per draft NLDC procedures made in compliance with Sharing regulations, 2020 CTU shall</p> <ul style="list-style-type: none"> Identify and furnish the details of YTC for transmission systems developed for Renewable energy projects to IA. CTU shall provide separate region wise YTC for static compensators (STATCOMs), static VAR compensators (SVCs), bus reactors, spare transformers, spare reactors and any other transmission element(s) located in the concerned region and identified by the CTU as being critical for providing stability, reliability and resilience in the grid. In case, separate YTC is not available for such transmission elements, it shall be calculated based on indicative cost and the details shall be furnished to IA. Provide a list of Inter-Connecting Transformers (ICTs) planned for the drawal of power by the concerned state along with the YTC of the transformers. <p>In case, YTC for drawl ICTs are not available, it shall be worked out by apportioning YTC approved by the Commission for the integrated project based on the indicative cost</p>	<p>Following comments are proposed;</p> <ol style="list-style-type: none"> In cases where separate element wise tariff is not available, separate cost/tariff as per Format 1 may not be required. Transmission licensee may provide combined approved/adopted YTC along with applicable technical details available with them. In all such cases bifurcation is to be done by CTU based on indicative cost, element detail for transmission line and all substation equipment and combined YTC is to be provided by transmission licensee to CTU. CTU by using element details and combined YTC shall bifurcate YTC using methodology as finalized. The ACC portion as worked out may be used by IA for Computation and sharing of AC System Component (ACC) of Transmission Charges 	<p>As mentioned in the earlier remarks, in case YTC is approved on consolidated basis for total project or for a pool of assets, the available YTC mentioning the details of pooled assets is to be furnished. The methodology for bifurcation of pooled cost among individual elements is to be discussed and finalized.</p> <p>In case non-availability of information on YTC of drawal ICTs, indicative cost to be used as mentioned in the Regulation. To be discussed and finalized.</p>
		<p>Charges</p> <p>Para 2.1, 3.1, 4.3, 5.1 & 10.4</p> <p>non-ISTS licensees whose assets have been certified by RPCs as being used for inter-State transmission</p>	<ul style="list-style-type: none"> In the Regulation, there is no mention of certification by RPCs of Non-ISTS Licensees whose assets are being used for inter-State transmission. This may be modified as below: 'non-ISTS licensees whose assets are being used for inter-State transmission.....' 	<p>As per the Regulation, Non-ISTS licensees whose assets are approved by CERC as being used for inter-State transmission are only to be considered. This Para is to be modified.</p>
		<p>Charges</p> <p>3.0 Notification of Peak Block by IA</p> <p>3.1 As per Regulation 2 (1) (r), Peak block is the block in which sum of net ISTS draws by all states/ regional entities is maximum. While identifying peak block, negative net ISTS drawal of any state/ regional entities shall be treated as zero.</p>	<ul style="list-style-type: none"> As per Regulation, sum of net ISTS draws by all States. However, it is felt that the drawal of regional entities can also be included in the computation of peak block. Implementing Agency may seek amendment or can be covered under removal of difficulties. As per procedure, it mentions that while identifying peak block, negative net ISTS drawal of any state/ regional entities shall be treated as zero. This is not in line with Regulation and in many cases it will distort the peak block (as few of the States may be net injecting into the grid on sustained basis) The two methods (one is without considering the negative draw as in procedure and other considering all draws and injection as given in Regulation) will give two different peak blocks and which may distort the peak ISTS usage. Therefore, it is suggested to follow the regulation i.e. „Peak block“ means the block in which sum of net ISTS draws by all States is maximum during the month. 	<p>As mentioned in the procedure, sum of net ISTS draws of regional entities also shall be considered along with states. However, Regulation has no mention of including Regional entities.</p> <p>The negative ISTS drawal occurs in rare cases and for only one or two entities. A study on this has already been done. Making zero would not have any significant impact on deciding peak block. Further, treating negative draws as zero while determining peak block was mentioned in explanatory memorandum issued for draft Sharing Regulations 2020.</p>
		<p>Charges</p> <p>2.1 This procedure will be applicable to the following categories of Designated ISTS Customers who use the ISTS: (a) Generating Stations/ Generating Units defined as regional entities in the IEGC, 2010 and any subsequent amendment made thereto. (b) ISTS Licensees and CTU and Deemed ISTS Licensees (c) Non-ISTS Licensees whose assets have been certified by RPCs as are being used for inter-State transmission. (d) Any Bulk consumer directly connected with ISTS, and (e) Any other designated entity representing a physically connected entity as per clauses (a), (c) and (d) above.</p>	<p>This may be rephrased as:</p> <p>2.1 This procedure will be applicable to the following: (a) All Designated ISTS Customers (DICs) (b) Generating Stations/ Generating Units defined as regional entities in the IEGC, 2010 and any subsequent amendment made thereto. (c) ISTS Licensees, CTU and Deemed ISTS Licensees (d) Non-ISTS Licensees whose assets are being used for inter-State transmission as approved by the Commission. (e) Any Bulk consumer directly connected with ISTS, and (f) Any other designated entity representing a physically connected entity as per clauses (b), (d) and (e) above. (g) NLDC, RLDCs & RPCs</p>	<p>Shall be suitably modified.</p>

Sl.No.	Stakeholders/ Commenters Name	Clause as per draft Procedure/ Regulation	Stakeholders Comments	NLDC Remarks
		<p>Charges</p> <p>3.2 The processed Special Energy Metered (SEM) data of the billing period available until first day of the billing month and NLDC SCADA data for the remaining period for which SEM data is not available, shall be considered for identification of Peak Block of the billing period</p>	<ul style="list-style-type: none"> In view of less accuracy of SCADA data, SEM data may only be considered for finalizing the peak block. Since the data pertain to peak block to be furnished to IA by 7th of the month by DICs, if peak block falls in the SCADA data, the vetting of the draws /injection into ISTS can be only by SCADA values. Whether timelines can be extended to take only SEM data for computation of peak block to avoid any controversy due to wrong SCADA data? 	<p>Extension of timelines was reviewed by CERC before notification of Regulation. To follow the timelines as mentioned in the Regulation, Mix of SEM data and SCADA data is necessary. On the basis of a study conducted by NLDC, for the year 2019, there is no major discrepancy in determination of peak block based on SEM data and SCADA data individually.</p> <p>Peak block once identified with the mix data is final. However, inclusion of additional clause on revision of only computation exercise in case of major discrepancy (>10%) in node wise generation/ demand once the SEM data is available for the remaining period shall be reviewed.</p>
		<p>Charges</p> <p>5.4 In case some of the transmission elements of the Associated Transmission System have achieved COD before the COD of Associated Transmission System, the YTC for such transmission elements of the Associated Transmission System shall be included, if such transmission elements are certified by the respective RPCs as required for improving the performance, safety and security of the grid.</p> <p>5.6 Where only some of the transmission elements of the Associated Transmission System have achieved COD before the COD of the Associated Transmission System and if such transmission elements are certified by the respective Regional Power Committee(s) as required for improving the performance, safety and security of the grid, the Yearly Transmission Charges for such transmission elements of the Associated Transmission System shall be included for determination of transmission charges.</p>	<p>5.4 & 5.6 are similar clauses and 5.4 can be deleted.</p>	<p>Shall be reviewed and modified accordingly.</p>
		<p>Charges</p> <p>5.8 In case a generating station or unit(s) thereof has achieved COD and the Associated Transmission System is delayed, the concerned Inter-State transmission licensee(s) shall make alternate arrangement at its own cost for despatch of power of the generating station or unit(s) thereof in consultation with the Central Transmission Utility; Provided that till such alternate arrangement is made, the inter-State transmission licensee(s) shall pay to the generating station, the Yearly Transmission Charge corresponding to the quantum of Long Term Access for the period for which the transmission system has got delayed. Accordingly, total MTC under this sharing mechanism is to be adjusted in such case.</p>	<p>There may not be any MTC adjustment in this case as there is no recovery from the generator. Therefore this clause may be deleted.</p>	<p>Clause to be reviewed and modified accordingly</p>
		<p>Charges</p> <p>5.9 In case of a transmission system where COD has been approved in terms of proviso (ii) of Clause (3) of Regulation 4 of the Tariff Regulations, 2014 or Clause (2) of Regulation 5 of the Tariff Regulations, 2019 or where deemed COD has been declared in terms of Transmission Service Agreement under Tariff based Competitive Bidding, the Yearly Transmission Charges for the transmission system shall be:</p> <p>a) paid by the inter-State transmission licensee whose transmission system is delayed till its transmission system achieves COD, or</p> <p>b) paid by the generating company whose generating station or unit(s) thereof is delayed, till the generating station or unit thereof, achieves COD, or</p> <p>c) shared in the manner as decided by the Commission on case to case basis, where more than one inter-State transmission licensee is involved or both transmission system and generating station are delayed.</p>	<p>A new para d) at the end may be added in the procedure:</p> <p>i.e as illustrated below:</p> <p>5.9 In case of a transmission system where COD has been approved in terms of proviso (ii) of Clause (3) of Regulation 4 of the Tariff Regulations, 2014 or Clause (2) of Regulation 5 of the Tariff Regulations, 2019 or where deemed COD has been declared in terms of Transmission Service Agreement under Tariff based Competitive Bidding, the Yearly Transmission Charges for the transmission system shall be:</p> <p>a) paid by the inter-State transmission licensee whose transmission system is delayed till its transmission system achieves COD, or</p> <p>b) paid by the generating company whose generating station or unit(s) thereof is delayed, till the generating station or unit thereof, achieves COD, or</p> <p>c) shared in the manner as decided by the Commission on case to case basis, where more than one inter-State transmission licensee is involved or both transmission system and generating station are delayed.</p> <p>d) „MTC and line lengths (total & to be considered in MTC) would be furnished by ISTS Transmission Licensee accordingly along-with all the computations/orders etc.“</p>	<p>It is expected that when the Commission review such scenarios and makes a decision, the decision will be drafted in detail including the clause 5.9 (d) content as suggested for inclusion.</p> <p>However, Clause 5.9(d) as suggested to include shall be reviewed and suitably incorporated.</p>
		<p>Charges</p> <p>Clauses 5.4 to 5.9</p> <p>5.4 In case some of the transmission elements of the Associated Transmission System have achieved COD before the COD of Associated Transmission System, the YTC for such transmission elements of the Associated Transmission System shall be included, if such transmission elements are certified by the respective RPCs as required for improving the performance, safety and security of the grid.</p> <p>5.5 Where only some of the transmission elements of the Associated Transmission System have achieved COD before the COD of the Associated Transmission System and the generating station seeks part operationalisation of Long Term Access, the Central Transmission Utility shall part operationalize Long Term Access, subject to availability of transmission system and Yearly Transmission Charges in respect of such transmission elements of the Associated Transmission System shall be included for determination of transmission charges of DICS.</p> <p>5.6 Where only some of the transmission elements of the Associated Transmission System have achieved COD before the COD of the Associated Transmission System and if such transmission elements are certified by the respective Regional Power Committee(s) as required for improving the performance, safety and security of the grid, the Yearly Transmission Charges for such transmission elements of the Associated Transmission System shall be included for determination of transmission charges.</p> <p>5.7 Where Long Term Access is granted to a generating station on existing margins and COD of the generating station or unit(s) thereof is delayed, the generating station shall, corresponding to the capacity that is delayed, pay transmission charges at the rate of 10% of transmission charge per MW for the State where such generating station is located. Accordingly, total MTC under this sharing mechanism is to be adjusted in such case.</p>	<p>Else</p> <p>Clauses 5.4 to 5.9 can be deleted and substituted as follows:</p> <p>For Specific cases mentioned in Regulation 13, Transmission Licensees shall furnish the following details:</p> <ul style="list-style-type: none"> Regulation 13(1): Certify the RE generators eligibility for transmission charges and losses (WPD & SPD wise) Regulation 13(3): YTC details of ATS, LTA operationalization (date and quantum), YTC billed to generator, YTC to be included in computation, corresponding line lengths etc 13(4) : Generating station part operationalization of Long Term Access details, Total ATS and ATS details to be included for determination of transmission charges of DICS 13(5): Certificate of the respective Regional Power Committee(s) that part ATS is required for improving the performance, safety and security of the grid, Total ATS & part ATS details. 13(7): LTA granted on existing margins details & LTA operationalization details 13(9): YTC of dedicated transmission line, LTA operationalized & quantum of Connectivity for the dedicated transmission line 13(11): Total Capacity of Generating station, LTA & MTOA access details & Unit's status connected to ISTS 13(12): Sharing mechanism details as specified by Commission details for the assets to be included for determination of transmission charges of DICS 	<p>Regulation 13(1): CTU will furnish the requisite details based on the eligibility for RE waiver</p> <p>Regulation 13(3): Based on all aspects, IA shall compute the YTC to be included in computation.</p> <p>Regulation 13(4): Such part operationalization of LTA with the available transmission elements shall be allowed by CTU after review. CTU shall furnish all the information related to part operationalization of LTA, YTC of transmission elements allowed under associated transmission system to IA. Shall be reviewed and relevant clause shall be suitably modified in the Procedures.</p> <p>Regulation 13(5): In such case of inclusion of specific transmission elements of an associated transmission system as allowed by RPC, the concerned licensee shall submit the respective elements YTC details along with the certificate of RPC. Shall be reviewed and relevant clause shall be suitably modified in the Procedures.</p> <p>Regulation 13(7): CTU shall furnish such information if LTA granted on existing margins and COD of generating station is delayed. Shall be reviewed and relevant clause shall be suitably modified in the Procedures.</p> <p>Regulation 13(9): In such case, the ISTS licensee shall claim the YTC of the assets for sharing under sharing mechanism. IA shall review and based on the LTA details furnished by CTU, shall decide whether to be considered for bilateral billing or to be considered under sharing mechanism.</p>

Sl.No.	Stakeholders/ Commenters Name	Clause as per draft Procedure/ Regulation	Stakeholders Comments	NLDC Remarks
14	SRPC	<p>5.8 In case a generating station or unit(s) thereof has achieved COD and the Associated Transmission System is delayed, the concerned Inter-State transmission licensee(s) shall make alternate arrangement at its own cost for despatch of power of the generating station or unit(s) thereof in consultation with the Central Transmission Utility: Provided that till such alternate arrangement is made, the Inter-State transmission licensee(s) shall pay to the generating station, the Yearly Transmission Charge corresponding to the quantum of Long Term Access for the period for which the transmission system has got delayed. Accordingly, total MTC under this sharing mechanism is to be adjusted in such case.</p> <p>5.9 In case of a transmission system where COD has been approved in terms of proviso (ii) of Clause (3) of Regulation 4 of the Tariff Regulations, 2014 or Clause (2) of Regulation 5 of the Tariff Regulations, 2019 or where deemed COD has been declared in terms of Transmission Service Agreement under Tariff based Competitive Bidding, the Yearly Transmission Charges for the transmission system shall be:</p> <p>a) paid by the Inter-State transmission licensee whose transmission system is delayed till its transmission system achieves COD, or</p> <p>b) paid by the generating company whose generating station or unit(s) thereof is delayed, till the generating station or unit thereof, achieves COD, or</p> <p>c) shared in the manner as decided by the Commission on case to case basis, where more than one Inter-State transmission licensee is involved or both transmission system and generating station are delayed.</p>		<p>Regulation 13(11): CTU shall furnish the requisite details for the implementation of this Regulation.</p> <p>Regulation 13(12): As mentioned in the above row.</p>
		<p>Charges</p> <p>5.0 Computation of ISTS Monthly Transmission Charges (MTC) by IA</p>	<p>• A new clause to be added in Clause 5:</p> <p>'All details of Bilateral Billing as covered in Sharing Regulations, 2020 needed to be furnished by CTU to IA by 25th day of the month following the billing period. After vetting, the same would be furnished by Implementing Agency to RPC for inclusion in RTA.'</p> <p>• This is required in compliance of CERC Order (one of the CERC Order in Petition No.155/MP/2016 dated 04-01-2017)</p>	<p>Shall be reviewed and suitably included in procedures.</p>
		<p>Charges</p> <p>6.1 IA shall compute approved injection/ with drawal of DICs based on details of entitlement of power to states / entities from central sector generating stations as received from RPCs and LTA/ MTOA details received from CTU.</p>	<p>Entitlement can be replaced corresponding LTA. There are two to three combinations like some station like NTPC Ramagundam is deemed LTA (Transmission Charges liability of each beneficiaries is computed based on Normative DC and share allocation), NTPC Kudgi is based on LTA granted and share allocation % is used for Transmission Charges liability of each beneficiaries and NNTPP where only part LTA is operationalized through ISTS and the transmission charges liability is computed as per LTA operationalized by CTU.</p> <p>SRPC was doing URS adjustment for corresponding LTA. Whether the same can be continued?</p> <p>The clause can be rephrased as 6.1 IA shall compute total access granted (MW) of DICs based on details of corresponding LTA to states / entities from central sector generating stations as received from RPCs and LTA/ MTOA details received from CTU.</p>	<p>As per the existing Regulation and practice, LTA details for a particular generating station shall supercede the entitlement details of the same generating station. The same shall be followed wherever applicable.</p> <p>Suitable clarity may be brought in the clauses drafted in Procedures.</p>
		<p>Charges</p> <p>6.4 Normative auxiliary consumption as per CERC terms and conditions of Tariff Regulations 2019, shall be subtracted from the Installed Capacity of Generating stations/ Generating Units while arriving at the approved injection/ approved withdrawal by IA.</p>	<p>There is no such term as approved injection/approved withdrawal in Sharing regulations 2020. Hence, the clause can be rephrased as:</p> <p>6.4 Normative auxiliary consumption as per CERC terms and conditions of Tariff Regulations 2019 shall be subtracted from the Installed Capacity of Generating stations/ Generating Units while arriving at the Corresponding LTA.</p>	<p>shall suitably be modified.</p>
		<p>Charges</p> <p>7.3 As per Regulation (9) (4) of the Sharing Regulations 2020, IA may moderate the nodal injection and withdrawal for each DIC so as to maintain load generation balance in the representative base case in consultation with NLDC/ RLDCs/ RPCs, if required, based on the historic injection and demand data available with them.</p>	<p>The clause can be rephrased as</p> <p>7.3 As per Regulation (9) (4) of the Sharing Regulations 2020, the implementing Agency may make minor adjustment in generation and demand data, if required, to ensure load/generation balance. This may be done in consultation with RLDCs based on the historic injection and demand data available with them. If required, RPCs and States may be consulted for specific major issues.</p>	<p>Shall be reviewed and suitably be modified.</p>
		<p>Charges</p> <p>8.3.1 Transformer Component for a State shall comprise of Yearly Transmission Charges for inter-connecting transformers (ICTs) planned for drawal of power by the concerned State.</p>	<p>8.3.1 can be rephrased as given in regulation.</p> <p>Transformer Component for a State shall comprise of Yearly Transmission Charges for inter-connecting transformers (ICTs) planned for drawal of power by the concerned State. A list of such transformers for each State shall be provided by the Central Transmission Utility to the Implementing Agency.</p>	<p>This is already covered in the clauses drafted in procedure. Shall be reviewed and suitably clarity may be brought in.</p>
		<p>Charges</p> <p>10.3 Inter-State Generating Stations connected at 220 kV and below voltage level shall be charged at the zonal charges determined for the state where such generators are physically located.</p>	<p>Use of this clause can be elaborated in the Procedure through examples.</p> <p>10.3 may be modified as follows:</p> <p>Inter-State Generating Stations connected at 220kV and below voltage level shall be charged at the transmission charges determined for the state where such generators are physically located.</p>	<p>shall be considered for modification.</p>
		<p>Charges</p> <p>10.4 Wherever lines belonging to an ISTS Licensee are Looped In Looped Out by an Intra-State Transmission Licensee, the entire length shall be considered for Load flow studies and average cost shall be applied on the whole line.</p> <p>Similarly, wherever line belonging to an Intra-State Transmission Licensee that is not certified by RPC is Looped In Looped Out by an ISTS Licensee, the charges of such lines shall not be considered in computation. The same may be recovered through scaling up the final charges.</p>	<p>The clause can be reworded as</p> <p>10.4 Wherever lines belonging to an ISTS Licensee are Looped In Looped Out by an Intra-State Transmission Licensee or vice versa, the entire length shall be considered for Load flow studies and proportionate cost to be recovered shall be applied on the whole line. The State portion would only be included after approval of the Commission.'</p>	<p>Proportionate cost to be recovered shall be applied on whole line but length of only ISTS part of network to be considered. In any case, state portion's length would not be considered in the computations.</p>
		<p>Charges</p> <p>10.6 Implementing Agency shall provide the following information to RPC as per Format I of this procedure:</p> <p>a) Approved Withdrawal/ Injection (MW) data for each month based on the allocation from central sector generating stations received from RPCs and LTA/MTOA details received from CTU.</p>	<p>The clause can be reworded as</p> <p>10.6 Implementing Agency shall provide the following information to RPC as per Format I of this procedure:</p> <p>a) Corresponding LTA (MW) data for each month based on the allocation from central sector generating stations received from RPCs and LTA/MTOA details received from CTU.</p>	<p>Shall be reviewed and modified accordingly.</p>

Sl.No.	Stakeholders/ Commenters Name	Clause as per draft Procedure/ Regulation	Stakeholders Comments	NLDC Remarks
		Charges 10.7 Schedule of charges payable by each constituent for the Billing Period shall be published by RPC on its website.	10.7 may be modified as follows: 10.7 Based on the information furnished by the Implementing Agency, Secretariat of the respective Regional Power Committee shall issue Regional Transmission Accounts and shall publish the same on its website.	Shall be reviewed and suitably modified.
		Charges 10.8 The existing practice of sending processed metered data from all SEMs for DSM billing shall be continued for issuance of Regional Transmission Deviation Account.	The clause can be reworded as 10.8 The Regional Transmission Deviation Account shall be prepared by RPC from the processed metered data of all SEMs furnished by RLDC to RPC on weekly basis for DSM account.	Shall be reviewed and suitably modified.
		Charges 12. Information to be published by IA in Public Domain	Needs to add the below items also in clause 12.1: 1. Details of transformers covered under Transformer Components for the State sector wise. i.e as illustrated below: 12.1 Implementing Agency shall provide following information in public domain: a) The Basic Network, generation at nodes and drawal at nodes considered for the Base Case and the load flow results, for each billing period and Assumptions if any; b) Details of transformers, list of transmission elements and corresponding transmission charges considered under Regional Component for the billing period; c) Details of transmission system covered under National Component; d) New transmission system added during billing period; e) YTC detail (Information submitted by the transmission licensees covered under the Regulation and computation by implementing f) Details of LTA and MTOA in respect of each DIC for the billing period; g) Detailed calculations of indicative cost for arriving at the average cost in respect of each transmission line; h) Transmission charges payable by each constituent for the billing month along with component-wise break-up. i) Details of transformers covered under Transformer Components for the State sector wise	Query based interactive application shall be developed by IA to provide required information. In any case, shall be reviewed and suitably modified.
		Charges 12.2 The above information can be viewed on the website of IA only after logging in. The username and password for this purpose can be generated through registration on the website.	A new para may be added as follows: All information is made available on the website of the Implementing Agency in editable "Microsoft Excel" format. i.e as illustrated below: 12.2 The above information can be viewed on the website of IA only after logging in. The username and password for this purpose can be generated through registration on the website. All information is made available on the website of the Implementing Agency in editable "Microsoft Excel" format.	Yes, Relevant information shall be made available both for viewing and to download as well in csv/ xls formats. Shall be reviewed and suitably modified.
		Collection of data 3.1, 6.2, 6.4, 6.4.1 (3), 6.4.2, 6.4.3, 6.4.9 & 8.1.1 (c), 8.1.3 (c) , Format I (1) , Format I (A) , Format I (B) , Format I (C) non-ISTS licensees whose assets have been certified by RPCs as being used for inter-State transmission	In the Regulation, there is no mention of certification by RPCs of Non-ISTS licensees whose assets are being used for inter-State transmission. This may be modified as below: '.....non-ISTS licensees whose assets are being used for inter-State transmission.....'	Non-ISTS licensees whose assets are being used for inter-state transmission shall only be considered on approval of CERC as per the Sharing Regulations 2020. Relevant clauses shall be modified accordingly in the procedures.
		Collection of data 6.4.10 In case some of the transmission elements of the Associated Transmission System have achieved COD before the COD of Associated Transmission System, the YTC for such transmission elements of the Associated Transmission System shall be included, if such transmission elements are certified by the respective RPCs as required for improving the performance, safety and security of the grid.	The clause 6.4.10 can be replaced with For Specific cases mentioned in Regulation 13, Transmission Licensees shall furnish the following details: • Regulation 13(1): Certify the RE generators eligibility for transmission charges and losses (WPD & SPD wise) • Regulation 13(3): YTC details of ATS, LTA operationalization (date and quantum), YTC billed to generator, YTC to be included in computation, corresponding line lengths etc • 13(4) : Generating station part operationalization of Long Term Access details, Total ATS and ATS details to be included for determination of transmission charges of DICs • 13(5) : Certificate of the respective Regional Power Committee(s) that part ATS is required for improving the performance, safety and security of the grid, Total ATS & part ATS details. • 13(7): LTA granted on existing margins details & LTA operationalization details • 13(9): YTC of dedicated transmission line, LTA operationalized & quantum of Connectivity for the dedicated transmission line • 13(11): Total Capacity of Generating station, LTA & MTOA access details & Unit's status connected to ISTS • 13(12): Sharing mechanism details as specified by Commission details for the assets to be included for determination of transmission charges of DICs	Repeated. Already made a remark above.
		Collection of data 6.5.2 Details of exempted LTA/MTOA of Renewable Energy (RE) based generation: (i) As per Regulation 13(1) to Sharing Regulations 2020, no transmission charges and losses shall be payable for the use of ISTS by generation based on solar and wind power sources fulfilling certain conditions as detailed in the Regulation. (ii) LTA/ MTOA of such RE generation shall be exempted to consider under the sharing methodology. However, the details of such RE generation exempted shall be furnished by CTU to IA.	The clause can be replaced as given below: 6.5.2 Details of exempted LTA/MTOA of Renewable Energy (RE) based generation: (i) As per Regulation 13(1) to Sharing Regulations 2020, no transmission charges and losses shall be payable for the use of ISTS by generation based on solar and wind power sources fulfilling certain conditions as detailed in the Regulation. (ii) LTA/ MTOA of such RE generation shall be exempted to consider under the sharing methodology. However, the details of such RE generation exempted shall be furnished by CTU to IA along-with supporting document.	Shall be reviewed and suitably be modified.
		Collection of data 7.0 Timeline for submission of data for each billing period:	A new clause can be added as given below (e) DIC shall submit quantum for which buyers have been identified under Long Term Access or Medium Term Open Access or both along with details of such buyers; i.e as illustrated below: 7.0 Timeline for submission of data for each billing period: a) Basic Network Data by DICs: with in first 7 days of each billing month b) YTC to be submitted by licensees: by the end of the billing period c) Nodal injection and Demand Data by DICs: with in first 7 days of each billing month d) LTA/ MTOA details and other data as detailed in Para 6.5 by CTU: with in first 7 days of each billing month (e) DIC shall submit quantum for which buyers have been identified under Long Term Access or Medium Term Open Access or both along with details of such buyers;	This information will be available in the LTA/ MTOA details furnished by CTU. Shall be reviewed and suitably be modified.
			No format is created for RE & special cases under Regulation 13.	Shall be reviewed and required formats to be prepared suitably.

Sl.No.	Stakeholders/ Commenters Name	Clause as per draft Procedure/ Regulation	Stakeholders Comments	NLDC Remarks
		<p>Losses</p> <p>3.2 In case the injection data of solar/wind generators is not available or in case pooled data of solar/wind generation is available where it is not possible to segregate the portion of solar/wind generation as applicable under (a) and (b) as above, /Isre shall be considered as zero in such scenario.</p>	<p>Injection/drawal of ISTS connected solar/wind generators is available and it is possible to segregate the portion of solar/wind generation as applicable under (a) and (b) as above with the downstream metering. Therefore the clause 3.2 may be deleted.</p>	<p>Shall be reviewed.</p>
		<p>Collection of data</p> <p>6.3.1 All DICs shall submit the following data to the Implementing Agency as well as to the respective RLDCs by 7th day of each billing month in the prescribed formats enclosed with this procedure:</p> <p>(i) Basic Network data along with the network connectivity diagram corresponding to peak block (an updated geographical power map/ single line diagram, indicating the lines which are kept open from end and bus split arrangement (if any). (ii) Total actual injection and withdrawal (MW and MVAR) data at various nodes or group of nodes for the notified peak block of the billing period. (iii) Details of long-term access and medium-term open access along with details of buyers for the billing period.</p>	<p>All DICs shall submit the following data to the Implementing Agency as well as to the respective RLDCs by 10th day of each billing month in the prescribed formats enclosed with this procedure.</p> <p>.....</p> <p>Similarly for CTU 10 days may be allowed</p> <p>Reasons-</p> <p>Time of 10 days for DICs is required to furnish data and information as it involves collection of data. Verification and approval from competent authority in the organisation before submitting.</p>	<p>Time lines are mentioned in the Procedures in line with the Regulation.</p>
		<p>Collection of data</p> <p>7.0 Timeline for submission of data for each billing period: a) Basic Network Data by DICs: with in first 7 days of each billing month b) YTC to be submitted by licensees: by the end of the billing period c) Nodal injection and Demand Data by DICs: with in first 7 days of each billing month d) LTA/ MTOA details and other data as detailed in Para 6.5 by CTU: with in first 7 days of each billing month</p>	<p>Timeline for submission of data for each billing period: a) Basic Network Data by DICs: with in first 10 days of each billing month b) YTC to be submitted by licensees: by the end of the billing period c) Nodal injection and Demand Data by DICs: with in first 10 days of each billing month d) LTA/ MTOA details and other data as detailed in Para 6.5 by CTU: with in first 10 days of each billing month</p>	<p>Time lines are mentioned in the Procedures in line with the Regulation.</p>
		<p>Charges</p> <p>6.4 Normative auxiliary consumption as per CERC terms and conditions of Tariff Regulations 2019, shall be subtracted from the Installed Capacity of Generating stations/ Generating Units while arriving at the approved injection/ approved withdrawal by IA.</p>	<p>Normative auxiliary consumption as per CERC terms and conditions of Tariff Regulations 2019, shall be subtracted from the gross generation of Generating stations/ Generating Units while arriving at ex-bus generation/ex-bus drawal.</p> <p>Reasons-</p> <p>Since, there is no terminology as approved injection/approved withdrawal in CERC sharing Regulation, 2020. Hence clause is re-framed as ex-bus generation/ex-bus drawal.</p>	<p>Clause shall be reviewed and suitably modified. SRPC has suggested to replace the terminology of approved injection/ approved withdrawal by LTA.</p>
15	Karnataka	<p>Charges</p> <p>7.3 As per Regulation (9) (4) of the Sharing Regulations 2020, IA may moderate the nodal injection and withdrawal for each DIC so as to maintain load generation balance in the representative base case in consultation with NLDC/ RLDCs/ RPCs, if required, based on the historic injection and demand data available with them.</p>	<p>The Clause can be framed as:</p> <p>As per Regulation (9) (4) of the Sharing Regulations 2020, the Implementing Agency may moderate with minor adjustment in generation and demand data, if required, to ensure load/generation balance. This may be done in consultation with RLDCs and state based on the historic injection and demand data available with them. If required, RPCs may be consulted for specific major issues. The NLDC/RLDC may not vary the inter-state flow to moderate the power flow.</p> <p>Reasons-</p> <p>The Implementing Agency shall run AC load flow studies on the Base Case as prepared in accordance with Clause(1) of this Regulation to determine power flow on each transmission line: Provide that while carrying out AC load flow studies, the Implementing Agency may make minor adjustment in generation and demand data, if required, to ensure load/generation balance. However, the NLDC/RLDC may not vary the inter-state flow to moderate the power flow.</p>	<p>with the minor adjustments in load/generation balance, there would not be any significant impact on ISTS flow.</p>
		<p>Charges</p> <p>12 Information to be published by IA in Public Domain</p>	<p>The following additional details needs to be incorporated:</p> <p>Details of State wise Transformers covered under Transformer Component.</p> <p>Reasons-</p> <p>For more clarity, State-wise data is suggested</p>	<p>Relevant information as per the Regulation shall be made available both for viewing and to download as well in csv/ xls formats.</p> <p>Shall be reviewed and suitably modified.</p>
		<p>Charges</p> <p>12.2 The above information can be viewed on the website of IA only after logging in. The username and password for this purpose can be generated through registration on the website.</p>	<p>The following may be added in the Clause:</p> <p>All information is made available on the website of Implementing Agency in editable "Microsoft Excel" format.</p> <p>Reasons-</p> <p>As per Clause 25.2 of CERC Sharing Regulation, 2020 "All information in accordance with Clause (1) of this regulation shall be made available on the website of the Implementing Agency in editable "Microsoft Excel" format."</p>	<p>Relevant information as per the Regulation shall be made available both for viewing and to download as well in csv/ xls formats.</p> <p>Shall be reviewed and suitably modified.</p>
			<p>Additional Clause:</p> <p>The beneficiaries shall be informed in detail about the monthly data (drawal/injection data at nodes) as finalised by IA for billing as per the provisions of the Regulations.</p> <p>Reasons-</p> <p>This is suggested as the beneficiaries are to be made aware of the amount they are paying to CTU based on the data finalised by IA.</p>	<p>Relevant information as per the Regulation shall be made available both for viewing and to download as well in csv/ xls formats.</p> <p>Shall be reviewed and suitably modified.</p>
		<p>Proviso 8.2.2 on Pg-9 of the Draft Procedure for Computation and sharing of ISTS Charges:</p> <p>Sharing of Transmission Charges under Regional Component of HVDC.</p> <p>8.2.2</p> <p>Transmission Charges under Regional Component of HVDC shall be shared by drawee DICs of the receiving region and injecting DICs (with untied LTA) of the receiving region, in proportion to their quantum of Long Term Access plus Medium Term Open Access and untied LTA, respectively.</p>	<p>From the language of the said Proviso of the Draft Procedure with respect to sharing of Transmission Charges under Regional Component of HVDC Transmission System by injecting DICs (with untied LTA), it is not clear whether these Transmission Charges shall apportioned on: a) Those injecting DICs (with untied LTA), who are located in the same region where such regional HVDC Transmission Systems are planned to supply power. OR b) Those injecting DICs (with untied LTA), whose such untied LTA has been granted for the same region where such regional HVDC Transmission Systems are planned to supply power.</p> <p>The above ambiguity may be suitably eliminated while issuing the final Procedure for Computation and sharing of ISTS Charges</p>	<p>Shall be reviewed and suitably clarified by modifying the clause.</p>
		<p>Regulation 11 (4) on Pg-14 of the CERC (Sharing of Inter-State Transmission Charges and Losses Regulations, 2020) dated 04.05.2020:</p>	<p>The Draft Procedure does not incorporate the above stated Offset</p>	

Sl.No.	Stakeholders/ Commenters Name	Clause as per draft Procedure/ Regulation	Stakeholders Comments	NLDC Remarks
16	MB POWER (MADHYA PRADESH) LIMITED	Off-set of transmission charges for Short Term Open Access paid by DIC during a billing month against the transmission charges payable by such a DIC for the untied LTA during the next billing month	mechanism stipulated under sub-clause (4) of Regulation 11 of the CERC (Sharing of Inter-State Transmission Charges and Losses Regulations, 2020) dated 04.05.2020. As such, while finalising the Procedure for Computation and sharing of ISTS Charges, this offset mechanism may be suitably incorporated under Proviso 9.0 on Pg-13 of the Draft Procedure, which deals with "Computation of Transmission Charges for Short Term Open Access"	This is not under the ambit of procedures framed by IA. This shall be covered in the procedure for collection and disbursement that would be framed by CTU.
		Regulation 11 (6) on Pg-14 of the CERC (Sharing of Inter-State Transmission Charges and Losses Regulations, 2020) dated 04.05.2020: Disbursement of Transmission Charges for Short Term Open Access collected in a billing month amongst the DICs during the next billing month	The Draft Procedure does not incorporate the above stated mechanism towards sharing of Transmission Charges for Short Term Open Access amongst the DICs as stipulated under sub-clause (6) of Regulation 11 of the CERC (Sharing of Inter-State Transmission Charges and Losses Regulations, 2020) dated 04.05.2020. As such, while finalising the Procedure for Computation and sharing of ISTS Charges, this mechanism towards sharing of Transmission Charges for Short Term Open Access may be suitably incorporated under Proviso 9.0 on Pg13 of the Draft Procedure, which deals with "Computation of Transmission Charges for Short Term Open Access"	This is not under the ambit of procedures framed by IA. This shall be covered in the procedure for collection and disbursement that would be framed by CTU.
		Regulation 12 on Pg-14,15 of the CERC (Sharing of Inter-State Transmission Charges and Losses Regulations, 2020) dated 04.05.2020: Transmission Deviation	Regulation 12 of the CERC (Sharing of Inter-State Transmission Charges and Losses Regulations, 2020) dated 04.05.2020 provides a mechanism for computation of Transmission Deviation (in MW) by a DIC and billing of Transmission Deviation Rate (Rs/MW) thereof on such a DIC. However, the Draft Procedure does not address this aspect of Transmission Deviation. As such, this aspect of computation of Transmission Deviation and billing of Transmission Deviation Rate thereof may be suitably incorporated in the final Procedure for Computation and sharing of ISTS Charges.	RTDA will be prepared by RPC. RLDCs send SEM data to RPCs for preparation of RTDA
17	UPPTCL	10.0 Determination of Transmission Charges for DICs 10.3 Inter-State Generating Stations connected at 220kV and below voltage level shall be charged at the zonal charges determined for the state where such generators are physically located.	In the procedure for Inter-State Generating Stations which are already commissioned and having LTA or allocated share for states, connected at 220kV and below voltage level, no provision has been stated for the recovery of YTC / Annual Transmission Charges (either approved by CERC or benchmarked) of evacuation lines (either ISTS or certified ISTS) of these generators. In view, it is proposed that the YTC/Annual Transmission Charges (either approved by CERC or benchmarked by the RPCs) of evacuation lines (ISTS or certified ISTS) of Inter-State Generating Stations which are already commissioned and having LTA or allocated share for states, connected at 220kV and below voltage level, shall be recovered from the respective state which are having LTA/ share in these Inter-State Generating Stations.	This clause is misplaced. It is actually with respect to STOA transmission charges of existing mechanism. Not pertained to LTA/MTOA based transmission charges. Shall be deleted.