

**BEFORE THE HON'BLE GUJARAT ELECTRICITY REGULATORY
COMMISSION AT GANDHI NAGAR**

IN THE MATTER OF:

Inviting comments/suggestion from Stakeholders on the Draft Gujarat Electricity Regulatory Commission (Multi Year Tariff) (First Amendment) Regulations, 2015 issued by Hon'ble Gujarat Electricity Regulatory Commission.

AND

IN THE MATTER OF:

Gujarat Energy Transmission Corporation Limited (GETCO)
Sardar Patel Vidyut Bhavan,
Race Course Circle,
Vadodara.

.....Appellant

The GETCO herein most respectfully submits its views/comments on Draft Gujarat Electricity Regulatory Commission (Multi Year Tariff) (First Amendment) Regulations, 2015 issued by Hon'ble Gujarat Electricity Regulatory Commission.

MOST RESPECTFULLY SHOWETH:

PREAMBLE:

Hon'ble GERC has issued draft Gujarat Electricity Regulatory Commission (Multi Year Tariff) (First Amendment) Regulations, 2015. In this regard the submission/ comments/ suggestions of GETCO are as under:

SUBMISSION:

1. GETCO's submission/ comments/ suggestions on draft Gujarat Electricity Regulatory Commission (Multi Year Tariff) (First Amendment) Regulations, 2015 are as under:

Clause. No.	Existing Clause	Proposed Clause in Amendment	GETCO Comments
<p>74</p> <p>Sharing of charges for intra-State Transmission Network</p> <p>74.1</p> <p>Determination of Monthly Transmission Tariff (MTT):</p>	<p>74.1.2</p> <p>The Total Transmission Cost (TTC) as determined by the Commission as per Regulation 74.1.1 above, shall be shared by all long-term and medium-term open access customers on monthly basis (including existing Distribution Licensees) in the ratio of their allotted capacities, in accordance with the following formula:</p> <p>Monthly Transmission Tariff (MTT) = $TTC / (ACs \times 12)$ (in Rs./MW/month);</p> <p>Where;</p> <p>TTC = Total Transmission Cost determined by the Commission for the transmission system for the relevant year (in Rs), and</p> <p>ACs = sum of capacities allocated to all long-term and medium-term open access customers in MW.</p> <p>Provided that Monthly Transmission Tariff shall also be shared by a Generating Company if power from such Generating Company is sold to a consumer outside the State of Gujarat, to the extent of capacity contracted outside the State:</p> <p>Provided further that the transmission tariff payable by any long-term or medium-term open access customer utilizing the transmission system for part of a month shall be determined as under:</p> <p>Transmission Tariff = $TTC / (ACs \times 8760)$ (in Rs./MWh);</p> <p>Where;</p> <p>TTC = Total Transmission Cost determined by the Commission for the transmission system for the relevant year (in Rs), and</p> <p>ACs = sum of capacities allocated to all long-term and medium-term open access customers in MW.</p>	<p>74.1.2</p> <p>.....</p> <p>.....</p> <p>No transmission tariff (Rs./MW/day) for the use of Intra-State transmission System network shall be charged for transmitting energy generated from the gas based generating capacity benefitted under the Gol Scheme promulgated vide Office Memorandum No. 4/2/2015-Th-I dated 27th March, 2015 for the years 2015-16 and 2016-17.</p>	<p>To appreciate the sanctity of the Gol & GoG directions, it is proposed that the waiver of transmission tariff is to be considered to incremental gas based generating capacity within the State of Gujarat, having PPA with GUVNL only, participating under the Gol Scheme.</p> <p>Waiver of transmission charges is to be considered for the incremental gas based power produced only by gas based generator below its target PLF as stated under the Gol Scheme.</p>

Clause. No.	Existing Clause	Proposed Clause in Amendment	GETCO Comments
75 Incentive	<p>75.1 The Transmission Licensee shall be entitled to incentive for increase in annual availability beyond the target availability prescribed under Regulation 70, in accordance with the following formula:</p> $\text{Incentive} = \text{ATC} \times \frac{[\text{Annual availability achieved} - \text{Target Availability}]}{\text{Target Availability}}$ <p>Where;</p> <p>ATC= Annual Transmission Charges determined by the Commission for the transmission system of the Transmission Licensee for the concerned year.</p>	<p>75.1 Provided that Annual Transmission Charges (ATC) determined by the Commission shall be reduced to the extent of reduced recovery on account of waiver off transmission charge for the gas based generation capacity benefitted under the Gol Scheme promulgated vide Office Memorandum No. 4/2/2015-Th-I dated 27th March, 2015 for the years 2015-16 and 2016-17.</p>	<p>Transmission cost towards incremental generation on e-bid RLNG should not be burdened on the Utility and all the beneficiaries of the intra state transmission system should contribute/ share such transmission charges as per their MW allocation. Annual Transmission Charges (ATC) of GETCO shall be divided by the transmission capacity after deducting capacity of incremental e-bid RLNG. This will increase the transmission charges per MW/Day and beneficiaries of the intra state transmission system will share the transmission charges as per their capacity utilisation. Therefore, Hon'ble Commission is requested to re-determine the transmission charges for Open Access consumers according to the amendment in regulation.</p>
77 Transmission losses	<p>77.1 The energy losses in the transmission system of the Transmission Licensee, as determined by the State Load Despatch Centre, shall be borne by the Transmission System Users in proportion to their usage of the intra-State transmission system.</p>	<p>77.1 Provided that no energy losses in the transmission system of the Transmission Licensee, shall be borne by the Transmission System Users for the usage of Intra-State transmission System network for transmitting energy generated from the gas based generating capacity benefitted under the Gol Scheme promulgated vide Office Memorandum No. 4/2/2015-Th-I dated 27th March, 2015 for the years 2015-16 and 2016-17.”</p>	<p>Energy losses in the transmission system of GETCO, as determined by the State Load Despatch Centre, shall be borne by all Transmission System Users except users for the usage of Intra-State transmission System network for transmitting energy generated from incremental e-bid RLNG. Thus, energy losses due to transmitting energy generated from incremental e-bid RLNG shall be adjusted in a way that total energy losses of the transmission system will not reduce/ alter.</p>

PRAYER:

Hon'ble Commission is requested to consider above views/ comments/ suggestions while finalizing first amendment of Gujarat Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2015.

**GUJARAT ENERGY TRANSMISSION
CORPORATION LIMITED**

DATED: 20.01.2016

PLACE: Vadodara