

# Suggetion on Rajasthan Electricity Regulatory Commission (Standards of Performance for Transmission Licensee) Regulations, 2020



Rajasthan Electricity Regulatory Commission (RERC) invited comments, objections, and suggestions through Public Notice on the draft of 'Rajasthan Electricity Regulatory Commission (Standards of Performance for Transmission Licensee) Regulations, 2020'. The present submission is in response to the notice. We request the Commission to accept this submission on record.

- 1) In Section 2, clause 2, it is suggested that the definition of the affected person may be replaced with the following to ensure legal clarity.

**“Affected Person”** means a User of State Transmission System in direct contract with the transmission licensee, who is affected due to non-adherence to the Standards of Performance specified in these regulations by transmission licensee.

- 2) In clause 2(6), the definition of “Intra-State Transmission Licensee” or “Transmission Licensee” limits the scope of transmission licensee to establish, create and maintain transmission lines within the State. This is contrary to the Electricity Act 2003 and the explanatory memorandum which deals with the whole of state transmission system, including sub-stations, power transformers, inter-connected transformers etc. Hence, it is suggested that the definition of transmission licensee is modified to include transmission utilities and licensee with their scope of work appropriately defined.
- 3) Voltage variation index and Frequency variation index, Voltage unbalance, system security (steady state stability, transient stability) were included in the Standard of Performance for Transmission Licensee in RERC (Transmission Licensee’s Standards of Performance) Regulations, 2004. The reason for exclusion of the same in revised regulations is unclear. Given the increase requirement of system level frequency and voltage control, it is revised that same are included in the proposed regulations.
- 4) Transmission Licensee shall also be required to report all safety related incidents to the regulator and Standards of Performance shall also be defined for the same.
- 5) Line Loading Limits of the transmission system must be maintained within permissible limits as specified by the CEA's Manual on "Transmission Planning Criteria" by the transmission licensee. Hence it is submitted that line loading limits may also be considered as a SOP in the proposed draft and suitable index shall be defined to monitor the same.
- 6) Standards must also be defined for data management and reporting to enforce discipline and consistency in reporting of data. It is suggested that RERC includes the same in the proposed regulations. This shall also include provisions for verification or certification and audit of data reported.
- 7) For the reliable and efficient functioning of the transmission system, voice and data communication becomes an important part for the system. It is suggested that Standard of Performance shall also be defined for the same in an appropriate format.

- 8) In Section 6, Clause 6.2, the Table providing percentage availability of all the transmission elements, ICTs are not mentioned whereas in Clause 6.3.2 (c) ICTs are mentioned while explaining the methodology for computation of Availability. It is suggested that suitable changes are made to ensure consistency in language.
- 9) Section 6, Clause 6.3.7 states **“Provided that SLDC may consult the transmission licensee or any expert for estimation of reasonable restoration time”**.

#### Our Comments

SLDC shall comply with restoration time limits defined within the regulations. Consulting transmission licensee or an expert can lead to conflict of interest or collusion. Any delay in restoration is a business and operations risk and should have been accounted for by the licensee in his bid. Additional relief should not be provided under any circumstances, except in cases of Force Majeure.

- 10) As per the **RERC (Transmission Licensees Standards of Performance) Regulations, 2004** standards for final stage-level-3 SAIFI were 18 interruptions per year (i.e., 1.5 interruptions per month) whereas in proposed draft regulations it is increased to two interruptions per month. Considering the advancements in technology and materials, the number of interruptions should either decrease or at least kept at 1.5 interruptions per month. The commission is requested to consider the same.
- 11) In Section 10, clause 10.2, it is proposed that **“Provided further that the compensation to be paid by the transmission licensee to the affected party shall be limited to 1.5 times of the applicable transmission charges for the affected person during such period of non-adherence of Standards of performance.”**

#### Our Comments

In case multiple transmission licensees are responsible for maintaining a transmission line, failure by any one transmission licensee can have a bearing on the user. Clarity needs to be provided for calculation of system availability and compensation in such cases.

- 12) It is suggested that Transmission Licensee shall conduct system studies such as load flow, short circuit, and transient stability studies at least once a year, and the same shall be included in Standards of Performance for Transmission Licensee in the proposed regulation and the reports shall be submitted to the commission and may also be shared with State Power Committee.
- 13) In line with the Transmission Standards laid down by APERC in the year 2003, it suggested that the commission notifies regulations for **‘Transmission Planning & Security Standards, Power Supply Planning & Security Standards, Transmission Operating Standards and Power Supply Operating Standards’** separately.