



Assam Power Distribution Company Ltd.

5th Floor, Bijulee Bhawan, Paltan Bazar,
Guwahati-781001

To

Dated 27.03.2017

The Secretary,
Central Electricity Regulatory Commission,
3rd floor, Chandralok building,
36, Janpath, New Delhi-110001.

Subject: Written submission of oral presentation on 22.03.2017 in the Public
Hearing.

Reference: Draft CERC Regulations No. 13/2/7/2015-PM/CERC dated 16.02.2017
Madam,

Reference above I am to submit the followings as written submission of the oral
presentation in the matter of draft regulations of CERC (Cross Border Trade of
Electricity) Regulations 2017 in the Public Hearing took place on 22.03.2017:

1. Regulation 3 of the draft states that scopes of the Regulations are applicable in
India and in the neighbouring countries which engage in cross border Trade of
electricity. However the regulations are being made under the provisions of 178
read with the section 66 of the electricity Act 2003. The said Act is applicable
only in the territory of India except the state of Jammu and Kashmir. It is hoped
that the Hon'ble Commission may suitably take care of the legal provisions
during the finalization of the said Regulations.
2. Regarding Regulation 4 of the draft the undersigned like to submit on the
interest the consumer and also from the point of view of utility prospective. The
Regulations are framed U/S 66 in the chapter VII under the title Tariff of the EA
2003. As such the other provisions such as U/S 61 and 64 may also be
applicable while determination of Tariff for Cross Boarder Trading of Electricity.
However nothing has been mentioned of the applicability of those sections in the
draft. The Regulations 61 and 64 specifically mention that the consumer interest
is to be protected while recovery of cost through Tariff. Therefore the Hon'ble
Commission may take care suitably to protect the consumer interest while
making the final draft.



3. Regarding institutional framework prescribed under Draft Regulation states that appointment of designated authority by MoP, Govt for facilitating the process of approval and laying down the procedure for cross border transaction and trade in electricity which involves various activities such as transmission planning, transmission ,trading activities etc. Therefore one Comprehensive regulation may be framed by the Central Electricity Authority (CEA) U/S 177G of the EA 2003. This will facilitate to overcome various technical and administrative issues of the cross border trading of electricity. It is prayed before the Hon'ble Commission to look into this aspect while framing the final draft.
4. From the consumer perspective the trader may not be appointed on nominated basis. The Hon'ble Commission or CEA may select the trader for cross border trading through a transparent bidding system and the lowest bidder may be recommended for selection as a trader by the Government of India. The Hon'ble Commission is also prayed to look into this aspect on consumer interest
5. Regulations 16,18,19,20,21,22,23,24,25 and whole of the system operation involves technical matters therefore CEA may be authorized or entrusted for making necessary Regulations after detailed discussion with the all the stake holders on the interest of the consumers and the utilities.
6. Regarding payment and payment mechanism it is prayed before the Hon'ble Commission to look into the aspects of application and other fees so that fees and charges should be minimum which will provide benefit to the consumers by lowering Tariff which is the mandate of law.

This is for favour of kind consideration of the Hon'ble Central Commission.

Yours faithfully


(H.M Sharma)

General Manager (Revenue)

Assam Power Distribution Company Limited

Stationed at Delhi

Copy to:

1. P.S. to the Managing Director, APDCL for favour of information of MD
2. The Chief General Manager (Commercial), APDCL, for favour of information and necessary action.