This is in reference to the Draft CERC (Cross Border Trade of Electricity) Regulations, 2017. FICCI would like to submit the following suggestions/ comments on the same:

S. No.	Clause No.	Description	Suggestions/ Comments
1	Chapter 2, 4(3,4)	(3) The tariff for the cross border transmission link from pooling station within India till the Indian border shall be determined as per CERC (Tariff Regulations), 2014 as amended from time to time.  (4) The tariff for transmission system within India shall be as per the prevailing laws under Section 62 or Section 63 of the Act.	The tariff for the cross border transmission link from pooling station within India, till the Indian border and for transmission system within India shall be as per the prevailing laws under Section 63 of the Act and Tariff Policy 2016 as amended time to time
2	Chapter 3, 9(3)	The mode of interconnection between a neighbouring country and India will preferably be through DC links	The mode of interconnection between a neighbouring country and India shall be such that it is technically feasible.  The links shall be as per system of the neighbouring country and could vary depending upon the system requirements.
3	Chapter 3, 15(2)	The CTU shall be responsible for the implementation of cross border transmission link between the pooling station within India till the Indian border.	The CTU shall be responsible for the implementation through Tariff based Competitive Bidding process of cross border transmission link between the pooling station within India till the Indian border.  Also, functions of Implementing Agency may be clearly defined.