



**एन टी पी सी लिमिटेड**  
(भारत सरकार का उद्यम)  
**NTPC Limited**  
(A Govt. of India Enterprise)

केन्द्रीय कार्यालय/Corporate Centre

Ref. No. 01:CD:701  
Date: March 29, 2017

To,  
The Bench Officer  
Central Electricity Regulatory Commission  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building  
36, Janpath  
New Delhi-110001

Sub: Filing of Comments of NTPC on the Draft CERC (Cross Border Trade of Electricity) Regulations 2017.


Dear Sir,

Please find enclosed herewith the Comments of NTPC on the Draft CERC (Cross Border Trade of Electricity) Regulations 2017 notified on 16<sup>th</sup> February 2017.

Kindly acknowledge the receipt of the same.

Thanking you.

Yours faithfully

  
(Shyam Kumar) 29/3/17  
AGM (Commercial)

Encl: As above

## NTPC Limited

**Subject: NTPC Comments on the CERC (Cross Border Trade of Electricity) Regulations 2017**

SI No	Provision of the Regulations	NTPC's views/ comments
1	<p><b>Regulations 4: Tariff Determination</b></p>	<p>The following clause may be added below Regulations 4 (1):</p> <p><i>Provided that the tariff applicable for cross border customers shall not be less than the CERC determined tariff,</i></p>
2	<p><b>Regulations 7: Eligibility criteria for participating Applicant</b></p> <p><i>(d) Export of electricity by the distribution licensees/ Public Sector Undertakings (PSUs) in India, if surplus capacity is available and certified by the connected distribution licensee or the PSU, as the case may be</i></p>	<p>'Surplus capacity' needs to be defined clearly. It may include the following power available to be sold to any entity of the neighbouring country.</p> <p>a) The Un-Requisitioned Surplus power available with the generating companies on real-time basis.</p> <p>b) The surrendered capacity by a beneficiary/ beneficiaries from a plant which has been tied up on long term basis.</p> <p>c) Any merchant capacity for which no long term PPAs has been signed.</p>
3	<p><b>New Regulations may be introduced</b></p>	<p>Where a cross border entity has been allocated power from an existing generating station, the cross border entity should be able to schedule any URS power available in that station similar to the provisions of the domestic beneficiaries.</p> <p>In such cases, the same should be treated as deemed allocation with long term cross border transmission access. There should not be any requirement of applying for short term access in the cross border transmission system.</p>
4	<p><b>Regulations 40: Payment Security Mechanism</b></p>	<p>The Payment Security Mechanism described in the Draft Regulations covers the transmission charges and other grid related charges. It should also cover the cost of electricity to be transacted. (i.e. Generator's bills)</p> <p>Accordingly, the following provisions may be added to cover the costs of the electricity transacted:</p> <p>a) There should be requirement of LC covering at least 2 months supply of electricity, based on the estimated average monthly billing.</p>

		<p>b) Due date of payment will be 30 days from the date of billing</p> <p>c) Rebate may be offered similar to the Rebate prescribed in the CERC (Terms and Conditions of Tariff) Regulations, as amended from time to time.</p> <p>d) Late Payment Surcharge may be applicable similar to the that prescribed in the CERC (Terms and Conditions of Tariff) Regulations, as amended from time to time.</p>
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