



ಪವರ್ ಕಂಪನಿ ಆಫ್ ಕರ್ನಾಟಕ ಲಿಮಿಟೆಡ್
POWER COMPANY OF KARNATAKA LIMITED

(GOVERNMENT OF KARNATAKA UNDERTAKING)

ನಿಗಮದ ಗುರುತಿನ ಸಂಖ್ಯೆ (ಸಿ.ಐ.ಎನ್) : ಯು40101ಕೆಎ2007ಎಸ್‌ಜಿಒ43640

Company Identification No (CIN) :U40101KA2007SGC043640

No: PCKL/ADP/JDP/DDP1/ADP4/CERC-Sharing Reg/2022-23/

Date:

To,

2384-90

12 JUL 2023

The Secretary,
Central Electricity Regulatory Commission,
3rd and 4th Floor, Chandralok Building,
36, Janpath, New Delhi – 110001.

Sir,

Sub: Submission of Comments/Views on the Notification of "Draft Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) (Third Amendment) Regulations, 2023"-Reg

Ref: CERC letter no. L-1/250/ 2019/CERC dated 12.06.2023.

Please refer to the draft notification dated 12.06.2023 proposing additions to Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) Regulations, 2020 & inviting comments from the stakeholders.

The proposed amendments to the regulations does not take care of the concerns of ESCOMs of Karnataka expressed in the petition No. 685/TT/2020. In the said petition, Karnataka ESCOMs have submitted that Raigarh-Pugalur HVDC line shall be considered as National Component even though initially the same was planned for Southern region.

Considering the fact that the said line is serving bi-directional flow of power, it was submitted to CERC that in similar cases of Biswanath-Chariali-Agra and Mundra - Mohindergarh HVDC lines was considered as National Component, keeping in mind that they are serving bi-directional flow of power. CERC in the above petition however did not accept the request of Karnataka ESCOMs on the ground that the same has to be recognized by Government of India only.

Against the above order of CERC of non-consideration of the Raigarh-Pugalur HVDC line as National Component, ESCOMs have filed an Appeal before APTEL vide DFR No. 87 of 2023. The APTEL has heard the arguments made on behalf of Karnataka ESCOMs and has kept it pending till reserved orders in TANGEDCO.

In view of the pending of Appeal and orders thereon by the Hon'ble APTEL, the proposed amendments please be withheld so that the orders of APTEL may be considered before issuing the amendments.

Without prejudice to the above, Karnataka ESCOMs hereby again submits that CERC may consider amending the regulation to provide for the HVDC lines which are bidirectional to be treated as National component even though they are planned as regional requirement, as present amendments still does not address fully Karnataka ESCOMs concern for reduction in transmission charges.

Yours faithfully,


**Additional Director (Projects),
PCKL Bangalore**

Copy submitted for kind information to:

1. PS to Additional Chief Secretary, ED, GoK with a request to place before ACS, ED GoK.
2. SPS to The Managing Director, BESCO, K.R Circle, Bengaluru-560001
3. SPS to The Managing Director, HESCO, Navanagar, Hubballi-580025.
4. SPS to The Managing Director, GESCOM, Station Main Road, Kalaburgi-581002.
5. SPS to The Managing Director, MESCOM, Corporate office, 4th Floor, MESCOM Bhavan, Bejai, Kavour cross Road, Mangaluru-575004.
6. SPS to The Managing Director, CESC, Corporate Office, No. CA-29, Vijaynagar 2nd Stage, Hinakal, Mysuru – 570 017.