

BEFORE THE CENTRAL ELECTRICITY REGULATORY COMMISSION, NEW
DELHI

IN THE MATTER OF:

NTPC Vidyut Vapar Nigam Ltd.

.....

Applicant

Comments on proposed amendment vide Public Notice

No. : L-1/(3)/2009-CERC & L-1/44/2010-CERC Dated: 28th October, 2016

It is humbly submitted that:

a. Proposed amendment:

In the Notification (Draft) No.: L-1/(3)/2009-CERC at clause 4.0 it is proposed that :
In clause (2) of Regulation 9 of the Principal Regulations, the words "or the transmission system under execution" shall be deleted.

Comments/Suggestions:

By implementing the above amendment it will force the applicant to keep on applying for MTOA repeatedly anticipating the increase of ATC. This will be a repeated exercise and every time the applicant will also have to pay the application fee to SLDC and CTU resulting in increase of cost of power.

Therefore, it is proposed that CTU may grant the MTOA on the transmission capacity available, but for balance quantum, not granted, the MTOA application may be kept on hold by CTU for the period of MTOA applied. In case there is any increase in ATC during this MTOA period the same may be granted to the applicant as per the approved procedure.

By implementing above repeated filling of MTOA application by applicant can be prevented and there by cost of power will also not increase and will make the system transparent.

It is proposed to replace the above amendment with following:

"and keep the MTOA application on hold for balance not granted quantum. In case there is any increase in ATC during the MTOA application period the same may be granted as per approved procedure"

Anurag CPT

(PTO)

b. Proposed Amendment :

In the Notification (Draft) No.: L-1/44/2010-CERC at clause 4.0 it is proposed that: Sub-clause (I) of Regulation 9 of the Principal Regulations shall be substituted as under:

“(1)The transmission charges for MTOA customers who are not availing LTA to target region for the capacity under MTOA shall be charged 1.25 times of the LTA POC rates as notified by the Commission from time to time.

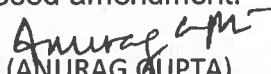
(2) The transmission charges for STOA customers who are not availing LTA to target region for the capacity under STOA shall be charged 1.35 times of the normal STOA POC rates as notified by the Commission from time to time. Provided that the surplus charges collected under above clauses shall be reimbursed back to DICs paying charges under first bill in the next month”.

Comments/Suggestions:

By implementing the above amendment the transmission charges for short term and medium term transactions will increase. The increase in transmission charges in short term and medium will adversely affect the short term power market.

Therefore, it is proposed to not to implement the above proposed amendment.

New Delhi
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