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VS/2016-17/101

5th November 2016

To,
Shubha Sarma
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001
Ph: 91-11-23353503, Fax: 91-11-23753923

Subject: Comments on Draft Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) (5th Amendment) Regulations, 2016

Reference: 1) CERC Notice No. L-1/(3)/2009-CERC & L-1/44/2010-CERC dated:28th Oct.'16
2) Draft Central Electricity Regulatory Commission (Sharing of Inter State Transmission Charges and Losses) (5th Amendment) Regulations, 2016

Dear Ma'am,

This is in reference to your notifications referred above, kindly find comments/suggestions as annexed herewith as Annexure-1.

Thanking You

Your Faithfully

Vineet Sarawagi

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8/11/16
Chief (Engg.)

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8/11/16

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Ajay

Annexure:1

S. No.	Notification No.	Notification Date	article No.	Page No.	Quote	comments/suggestions	Rational
1	L- 1/44/2010-CERC	28-Oct-16	7 (1) (q)	1	Additionally, Reliability Support Charge shall also be payable by a DIC for the quantum of Connectivity granted by CTU from the date of physical Connection to ISTS including the case where DIC is not availing any LTA / MTOA provided that the total quantum for the purpose of Reliability Charge shall not exceed the quantum of Connectivity granted to a DIC:.....	There should be no charges additional burden on Generators (like Reliability Support Charges) for quantum of power not injected into the Grid.	Connectivity is always taken for maximum quantum that can be injected into the Grid by any Generator. So, a generator cannot be penalized in terms of paying charges for power not injected or generated even because of whatever reasons (which can be because of less scheduling/plant outage/etc.). Even Hon'ble Commission in its draft paper for GNA have proposed to made full quantum to have connectivity. So, it would be injustice to ask payment for quantum which is not generated or which could not be generated.
2	L- 1/44/2010-CERC	28-Oct-16	8 (7)	2	(7) For generators with LTA to target region whose POC rate has not been determined for the quarter, shall be billed at Average PoC rate of target region.	Charges in the scenario should be minimum of the target region charges.	Since the charges payable in such scenario is of the nature of compensation not of penalty. So, the charges should be minimum of the regional charges.
3	L- 1/44/2010-CERC	28-Oct-16	2.8.1 (c)	5For Generators whose Connectivity is for quantum more than its LTA+MTOA, Reliability Support Charges shall be obtained by multiplying the above rate by [Connectivity quantum - (LTA+MTOA)]	Additional Charges methodologies should be omitted. There should be any charges leviable on such methodology.	Generators have to pay Reliability Support Charges for power scheduled under Short/Medium/Long term transactions. So, levying charges in additional scenarios are not required.