



एनएचपीसी लिमिटेड
(भारत सरकार का उद्यम)

NHPC Limited

(A Government of India Enterprise)

संदर्भ सं./Ref. No. NH/Comml./Tariff/315/2016/287

फोन/Phone : _____

दिनांक/Date : 27.12.2016

Secretary
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderlok Building,
36 - Janpath, New Delhi- 110 001
Fax: 011-23753923

Sub:- Comments on proposed CERC (Grant of Connectivity, Long-Term Access and Medium-Term Open Access in inter-State Transmission and related matters) (Sixth Amendment) Regulations, 2015 - Regg.

Ref:- NHPC Letter No. NH/Coml./Tariff/315/2016/2698 dated 25.11.2016

Respected Madam,

In continuation to our earlier letter dated 25.11.2016, we have to submit following suggestions for incorporation in the proposed amendment:

1. As intimated earlier, hydro power projects are highly capital intensive and its tariff in initial years are getting prohibitive. NHPC is facing serious problems in signing of Power Purchase Agreements (PPA) in respect of its new and upcoming projects due to high tariff.

In view of above, the construction of dedicated transmission line should be treated as a separate project (to be executed by Generating Companies) for the purpose of transmission charges and accountal of energy losses etc.

2. For construction, operation & maintenance of transmission lines, transmission license is required. In case of construction of dedicated transmission lines by the generating companies, whether the generating company will be treated as deemed transmission licensee or separate license will be issued by the Commission. Generating Company shall be required to file a separate petition for tariff of dedicated transmission line.

This point may be suitably clarified in the amendment.

3. In future, many hydro power projects, by Central / State Generating Companies or by private companies may come up in the vicinity of a new project wherein the construction of project specific dedicated transmission line may not be techno-



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Continuation Sheet No.2.....

commercially viable. In many cases, the Developer Companies may not be the same. In that situation, construction of dedicated transmission line by any generating company will create disputes between various generating companies / Developers wherein the line may be required to be shared and beneficiaries may also be different.

The above issue may also be looked into in the amendment.

Submitted for consideration please.

Thanking You,

Yours Faithfully,

A.K. Pandey
27/12/16

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