



## Comments on Draft CERC (Grant of Connectivity and GNA to ISTS) Regulations, 2017

S.No.	Regulation	Particulars	Comments and Suggestions
1.	7.25  8.1	<p><i>On completion of the dedicated transmission line the generator(s) shall be required to hand over the dedicated transmission line to CTU for the purpose of operation and maintenance. CTU shall be entitled to normative operation and maintenance expenses as per CERC Tariff Regulations. The line shall be under the operational control of CTU for all the purposes.</i></p> <p><i>The dedicated transmission line from switchyard of generating station or Solar Power Park Developer or Wind Power Park Developer or Wind- Solar Power Park Developer to the pooling station of the transmission licensee (including deemed transmission licensee) shall be developed and owned and by the applicant and shall be operated by CTU as per Regulation 7.25. The specifications for dedicated transmission lines shall be indicated by CTU while granting Connectivity.</i></p>	<ul style="list-style-type: none"> <li>• Section 10 of the Electricity Act 2003 empowers a Generating Company to establish, operate and maintain the dedicated transmission lines. The relevant provision of the Act is reproduced below: <ul style="list-style-type: none"> <li><b><i>“Section 10. (Duties of generating companies): --- (1) Subject to the provisions of this Act, the duties of a generating company shall be to establish, operate and maintain generating stations, tie-lines, sub-stations and dedicated transmission lines connected therewith in accordance with the provisions of this Act or the rules or regulations made thereunder.</i>”</b></li> </ul> </li> </ul> <p>Therefore, the proposed Regulations to hand over the dedicated transmission line to CTU for operation &amp; maintenance are contrary to the above provision of the Act. We therefore propose that the generating companies shall be responsible both for construction and O&amp;M of the dedicated transmission lines and such, Normative O&amp;M Expenses shall be retained by the generating companies. The Hon’ble Commission may kindly finalize the Regulation accordingly.</p>