

October 31, 2019

To,
The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chandralok Building,
36, Janpath, New Delhi -110001

Sub: Draft CERC (Sharing of Revenue Derived from Utilization of Transmission Assets for Other Business) Regulations, 2019

Dear Sir,

This has reference to the public notice no. L-1 /246/2019/CERC dated 25th September, 2019 wherein Hon'ble Commission has invited comments/suggestions on the draft CERC (Sharing of Revenue Derived from Utilization of Transmission Assets for Other Business) Regulations, 2019.


In this regard, Torrent Power Ltd. (TPL) would like to submit its comments/ suggestions as under.

- **Manner of Sharing of Revenue:** The draft Regulation 5(1)(a) provides that in case the transmission licensee engages in telecommunication business, an amount equal to 10% of the gross revenue from such business in a given financial year shall be shared with the Long Term Customers. In this regard, TPL would like to submit that the stipulation of sharing of 10% of gross revenue is required to be revised to 10% of net revenue after tax since for earning the revenue, in addition to operating expenses, debt and additional capex are required by Transmission Service Provider and same is to be serviced including applicable tax.
- **Restrictions:** The draft Regulation 8(2) provides that the transmission licensee shall not in any way, directly or indirectly, encumber its transmission assets to support Other Business. In this regard, TPL would like to submit that since the revenue is to be shared with the Long Term Customers (LTCs), creation of encumbrance should be allowed.

TPL requests the Hon'ble Commission to kindly consider the above comments/suggestions.

Thanking You

Yours faithfully,



Chetan Bundela

Vice President (Corporate Affairs)