ASSAM ELECTRICITY REGULATORY COMMISSION
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NO. AERC-48/2003/Pt-I/165   Dated: Guwahati the 9th December, 2019.

From :   **The Secretary**
         Assam Electricity Regulatory Commission

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

Sub: Views and comments on draft notification on Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019.

Ref: No L-1/250/2019/CERC dated 31.10.2019

Sir,

        With reference to above, I am directed to inform you that the Assam Electricity Regulatory Commission has gone through the draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019 and the observations and comments are as follows------

1) The power for determination of ISTS charges is with the Central Electricity Regulatory Commission as provided in Electricity Act 2003. The state regulators have no power to entertain such matters. So it may be difficult to prescribe a methodology for recovery of ISTS charges from the embedded intra-state entities other than Designated Interstate Consumer as well as Short Term Open Access transactions.

2) To avoid this complication likely to be arised, the Assam Electricity Regulatory

Commission has proposed following methodology for kind consideration of Central Electricity Regulatory Commission-

a) The transmission charges for STOA transactions should be retained and the rate may be considered as equal to transmission deviation rate of the concerned state.

b) The STOA charges so collected shall be adjusted against the LTA/MTOA bill of the concerned Designated Interstate Consumer.

This is for favour of kind consideration of the Hon'ble Central Electricity Regulatory Commission

Yours faithfully

Secretary
Assam Electricity Regulatory Commission