



**TATA POWER-DDL**

TPDDL/PMG/CERC/03012020

Dated:- 03<sup>rd</sup> Jan'2020

Mr. Sanoj Kumar Jha,  
Secretary,  
Central Electricity Regulatory Commission,  
3rd & 4th Floor,  
Chandrllok Building,  
36, Janpath, New Delhi-110001,

**Subject: Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019.**

Dear Sir,

We write in reference to discussions held at CERC on 02<sup>nd</sup> Jan'2020 on the subject cited above and our comments submitted vide letter dated 30<sup>th</sup> Dec'2019. As discussed in the meeting, we take this opportunity to submit our comments on non-applicability of transmission charges in respect of Short Term Open Access transactions and penal charges for crossing the drawl limits beyond pre-defined LTOA+MTOA quantum availed by any DIC.

We welcome the above as the same is intended towards restricting the overall drawal of a DIC within the pre-specified LTOA+MTOA quantum availed by them and overall commercial Discipline. However, under the above, administration of short term transactions by certain open access consumers/ deemed licensees would become difficult as they are without any LTOA and hence, they will not be billed any transmission charges as per new regime. Further, scheduling of power under Short term by such deemed licensees / open access consumers would result into transmission deviation charges for the utilities in which they are embedded resulting into consequential penalty & transmission charges beyond the usage by utilities.

To overcome the issues associated with the above, we request the Hon'ble Commission to put an appropriate mechanism in place under which embedded consumers are liable to pay the transmission charges corresponding to their ISTS usage and any Transmission deviation charges being levied upon the concerned distribution licensees on account of fault of such embedded (temporary ISTS customers) may be addressed.

Thanking You.

Yours Sincerely,  
For Tata Power Delhi Distribution Ltd.

  
Sumit Sachdev  
HoD (Power Management Group)