

From: JIGNESHLANGALIA@torrentpower.com

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Subject: RE: **TPL Comments** --- draft CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2019

To: secy@cercind.gov.in, shilpa@cercind.gov.in

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Respected Sir/Madam,

In continuation of trailing mail and based on the discussion during workshop organized by the Hon'ble CERC, we submit following additional **comment/** Suggestion for your kind consideration.

Regulation No.	Suggestion	Rationale
<u>Regulation No. 13 (2)(c)(vii).</u> The charges for transmission deviations shall be calculated for a State as a whole. The charges for transmission deviation for an embedded intra-State entity shall be as determined in accordance with the regulations or orders of the respective State Commission.	<u>Following two Proviso may be added below Cl 13 (2)(c)(vii).</u> "Provided that charges for transmission deviation for an embedded intra-State entity shall not be more than charges if calculated at Transmission Deviation Rate for the State as a whole for the deviation by such embedded entity. Provided further that State shall not recover transmission deviation charges more than the transmission deviation charges payable by it for transmission deviation of the State as a whole in each time block"	<ul style="list-style-type: none">• Transmission Deviation Charges being a levy pertaining to utilization of Inter State Transmission Network, determination of the same falls within jurisdiction of the Hon'ble CERC. Hence, the same is required to be determined by the Hon'ble CERC only.• In case the proposed draft is implemented as it is, it may lead to multiple litigations.• Hence, we request the Hon'ble CERC to prescribe a uniform methodology for Transmission Deviation Charges for the embedded entities of the State as well.• Alternatively, we humbly suggest to insert two provisos as suggested herewith to make the Regulation legally tenable and also to ensure prudence in the determination of charges by the State

Regards

Jignesh Langalia

GM (Regulatory Affairs)