



MP POWER MANAGEMENT COMPANY LIMITED
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No. CGM (Regulatory)/ 171

Jabalpur, Dated: 20/08/2020

To,

The Secretary
Central Electricity Regulatory Commission,
3rd& 4th Floor, Chandralok Building,
36, Janpath,
NEW DELHI - 110 001.

Sub: Comments on draft CERC (Regulation of Power supply) (First Amendment) Regulations, 2020.

Ref: CERC Public Notice dated 16.07.2020.

Reference may please be made to Public Notice dated 16.07.2020 vide which comments/suggestions/objections have been invited by Central Commission on draft CERC (Regulation of Power supply) (First Amendment) Regulations, 2020. In this context comments/suggestions on behalf of M.P. Power Management Company Ltd., Jabalpur are enclosed herewith for kind consideration of Hon'ble Commission.

Encl: As above.


Addl. CGM(Regulatory)
O/o CGM (Commercial-1)

**COMMENTS ON DRAFT CENTRAL ELECTRICITY REGULATORY COMMISSION
(REGULATION OF POWER SUPPLY) (1ST AMENDMENT) REGULATIONS, 2020**

Commission has floated the Draft Central Electricity Regulatory Commission (Regulation of Power Supply) (First Amendment) Regulations, 2020 to align provision of the 2010 Power Supply Regulations with various amendments/ repeals/ enactments that took place during the intervening period. Commission has invited comments/ suggestions/ objections from the stakeholders and interested persons on the provisions of above draft Regulation. Accordingly, following suggestions/ comments on behalf of MP Power Management Company Ltd. are being submitted for kind consideration of Hon'ble Commission:

S. No of Draft.	Existing provision	Proposed provisions	Comments
2(2)	Sub-clause (d) of clause (1) of Regulation 2 is regarding definition of Commission	Sub-clause (d) of Clause (1) of Regulation 2 of the Principal Regulations titled as "Defaulting Entity" shall be renumbered and substituted as under: (d-i)	The proposed amendment is not clear as the existing provision in sub-clause (d) of clause(1) of Regulation 2 is defining 'Commission' and not the 'Defaulting entity'. May kindly be examined to avoid inadvertent error. The proposed amendment must be to replace the existing sub-clause (e) of (1) of Regulation 2
2(3)	Sub-clause (f) of clause (1) of Regulation 2 is regarding definition of 'Default Trigger Date'	Sub-clause (e) of Clause (1) of Regulation 2 of the Principal Regulations shall be substituted as under: '(e) Default Trigger Date'	Sequencing/numbering of the proposed amendment is not clear. It is proposed that Sub-clause (f) of Clause (1) of Regulation 2 of the Principal Regulations shall be substituted instead of substituting sub-clause (e)of clause (1) of Regulation (2)
2(4)	No existing clause	New sub-clause (e-i) shall be added after sub-clause (e) of Clause (1) of Regulation 2 of the Principal Regulations as under: "(e-i) "Due date" for payment of outstanding dues shall be: i)..... ii) iii) as per provisions of the respective Agreements for entities not covered under sub-clauses (i) and (ii) above."	The proposed new sub-clause (e-i) (iii) should be deleted and similar provision as proposed in sub-clause (e-i) (i & ii) must also be made applicable to all entities irrespective of the provisions contained in the Agreement. This is being proposed for the sake of consistency and uniformity in the treatment of due date for all the stakeholders.

2(5)	Sub-clause (g) of clause (1) of Regulation 2 is regarding definition of 'Load Despatch Centre'	Sub-clause (g) of Clause (1) of Regulation 2 of the Principal Regulations shall be substituted as under: "(g) "Outstanding dues".....	In existing Regulation Sub clause (g) of clause (1) of Regulation 2 defines 'Load Despatch Centre' therefore the proposed amendment should be to substitute Sub clause (h) of clause (1) of Regulation 2.
2(6)	Sub clause (j) of clause (1) of Regulation 2 defines 'Regulated Entity'	Proposed to delete this clause	The expression 'Regulated Entity' has been used in proposed amendment of proviso to Regulation 11 and therefore this definition can be retained or else the word 'Regulated Entity' may be substituted with word 'Defaulting Entity'
10.	Regulation 14 is regarding treatment of Regulation of power supply from a Hydro Generating Station which also defines the treatment in the situation that the Hydro Generating Station is not able to sale power from its Hydro Generating unit through UI mechanism	This clause has been proposed to be substituted wherein no mention of management of surplus power is made in case of Regulation of power supply by Hydro Generating Station where the generator is not able to sale full quantum of regulated power.	It is proposed to mention the method of treatment of regulated surplus power which the Hydro Generating Station is not able to sale but have to utilize to generate electricity to avoid slippage of water. It is proposed to incorporate this through mention of Deviation Settlement Mechanism and Related Matters Regulation 2014 in the proposed amendment.
11.	Regulation 14 is regarding treatment of Regulation of power supply from a Hydro Generating	This clause has been proposed to be substituted wherein no mention of management of surplus power in case of Regulation of power supply by Hydro Generating Station where the generator is not able to sale full quantum of regulated power.	It is proposed to mention the method of treatment of regulated surplus power which the Hydro Generating Station is not able to sale but have to utilize to generate electricity to avoid slippage of water. It is proposed to incorporate this through mention of Deviation Settlement Mechanism and Related Matters Regulation 2014 in the proposed amendment.