



Transmission

Ref: ATIL/CERC/27092022

Date: September 27, 2022

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

Sub: Comments on Draft CERC (Terms and Conditions of Tariff) (Third Amendment) Regulations, 2022

Dear Sir,

The Hon'ble Commission, vide public notice dated 06.09.2022 invited comments/suggestions/objections on the subjected draft regulations. Our comments on the same has been annexed as **Annexure-1**. As required by public notice, we have also uploaded our comments on E-portal of CERC.

We request the Hon'ble Commission to take our views on record.

Thanking You
Yours Faithfully

For **Adani Transmission (India) Limited**

Authorized Signatory

Enclosure: as mentioned above

Annexure-1

S. No.	Clause No.	Drafted statement in the tariff proposal	Proposed modification by ATIL	Rationale on the proposed comments
1	Appendix-II, Clause 4, Subclause .iii	<p>Shutdown availed for shifting of Transmission Line for Project(s) of NHAI, Railways and Border Road Organisation. Member Secretary, RPC may restrict the deemed availability period to that considered reasonable by him for the work involved;</p> <p>Provided that such deemed availability shall be considered only for the period for which DICs are not affected by the shutdown of the such transmission line.</p>	<p>Shutdown availed for shifting of Transmission Line for Project(s) of NHAI, Railways, Border Road Organisation and project of any other government/public utility. Member Secretary, RPC may restrict the deemed availability period to that considered reasonable by him for the work involved;</p> <p>Provided that such deemed availability shall be considered only for the period for which DICs are not affected by the shutdown of the such transmission line.</p>	<p>Utilities such as SSNL, State Road, MSRDC, etc are not mentioned in the proposed comments. For the diversion of such utilities, there is limited clarity in the proposed draft.</p> <p>We further request Hon'ble Commission to bring clarity on availability of Deemed CoD only in cases where DICs are not affected by shutdown as shifting of line will always affect the DICs.</p>
2	Appendix-II, Clause 5, Subclause iii	<p>The outage period which can be excluded for the purpose of sub clauses (i) and (ii) of this clause shall be declared as under:</p> <p>a) Maximum upto one month by Member Secretary, RPC</p> <p>b) Beyond one month & upto three months after decision at RPC</p> <p>c) Beyond three months by the Commission for which the transmission Licensee shall approach the Commission along with reasons, steps taken to mitigate the outage and restoration timeline.</p>	<p>The outage period which can be excluded for the purpose of sub clauses (i) and (ii) of this clause shall be declared as under:</p> <p>a) Maximum upto one month by Member Secretary, RPC</p> <p>b) Beyond one month & upto six months after decision at RPC</p> <p>c) Beyond six months by the Commission for which the transmission Licensee shall approach the Commission along with reasons, steps taken to mitigate the outage and restoration timeline.</p>	<p>The nature of outages for such Force majeure events, Grid disturbances, etc are of technical nature. Hence upto six months, the same may be vested within the purview of RPC. For any further period, the matter may be approached to the Hon'ble Commission. Further, for critical river crossings or installations with high ROW, restoration with ERS also takes longer time. During high RE generation period, outages are allowed on piece meal basis, wherein outage days are more while effective outage hours are only during a specific period.</p>