



**BSES Yamuna Power Limited**

Shakti Kiran Building, Karkardooma,  
Delhi - 110032, India  
CIN : U40109DL2001PLC111525  
Tel. : +91 11 4124 7111  
Fax : +91 11 4124 9765  
www.bsesdelhi.com

Ref: RA/BYPL/2022-23/197

Dated:27.09.2022

The Secretary,  
Central Electricity Regulatory Commission,  
Third Floor, Chanderlok Building,  
36, Janpath,  
New Delhi-110001

Sub: Draft Central Electricity Regulatory Commission (Terms and Conditions of  
Tariff) (Third Amendment) Regulations, 2022.

Ref: Hon'ble CERC's Public Notice No. L-1/236/2018/CERC dated 06.09.2022

Sir,

We write in reference to the aforesaid draft amendment Regulations, wherein  
comments have been sought from the stakeholders.

Accordingly, BYPL comments on the same are enclosed as Annexure-A for kind  
consideration of the Hon'ble Commission.

Thanking You,

**For BSES Yamuna Power Limited,**

Sameer Singh

(Authorized Signatory)

Encl: As above

Annexure-A

Sr No.	CERC (Terms and Conditions of Tariff) Regulations, 2019.	Draft CERC (Terms and Conditions of Tariff) (Third Amendment) Regulations, 2022.	Remark
1	<p>4. The transmission elements under outage due to following reasons shall be deemed to be available:</p> <p>i. Shut down availed for maintenance of another transmission scheme or construction of new element or renovation/upgradation/additional capitalization in existing system approved by the Commission. If the other transmission scheme belongs to the transmission licensee, the Member Secretary, RPC may restrict the deemed availability period to that considered reasonable by him for the work involved. In case of dispute regarding deemed availability, the matter may be referred to Chairperson, CEA within 30 days.</p> <p>ii. Switching off of a transmission line to restrict over voltage and manual tripping of switched reactors as per the directions of concerned RLDC.</p>	<p>“iii) Shut down 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; Provided that such deemed availability shall be considered only for the period that DICs are not affected by the shutdown of the such transmission Line.”</p>	<p><b>BYPL Comment:</b> Methodology for considering the deemed availability Period to be define elaborately since availability impacts on transmission charges and there is a possibilities that if transmission elements is under outage as mention in Sub Clause (iii) of Clause 4 but considered as available by RPC.</p> <p>Then in that case outage may ended up in DISCOM arranging additional Power to meet demand from other source and also paying more Transmission charges due to more availability which is not in favor of DISCOM.</p>