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KARNATAKA POWER TRANSMISSION CORPORATION LIMITED

Corporate Identity Number (CIN): U40109KA1999SGC025521

Corporate Office,
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Bengaluru-560009

No. KPTCL/B36/33997/2022-23/118 - 1121
Encl :

Dated: 27-10-2022

**The Secretary,
Central Electricity Regulatory Commission (CERC),
3rd and 4th Floor, Chanderlok Building,
36, Janpath,
New Delhi - 110001**

Sir,

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

Ref: CERC Public Notice No: L-1/236/2018/CERC Dated: 06.09.2022.

Central Electricity Regulatory Commission (CERC) has notified the Draft Central Electricity Regulatory Commission (Terms and Conditions of Tariff) (Third Amendment) Regulations, 2022 on 6th September, 2022 inviting comments/suggestions/ objections from the stakeholders.

In this regard, I am directed to enclose herewith the comments/suggestions of KPTCL on Draft Central Electricity Regulatory Commission (Terms and Conditions of Tariff) (Third Amendment) Regulations, 2022 with a request to kindly place the same before the Hon'ble Commission for incorporating the suggestions made by KPTCL in the Draft Amendment Regulations.

*"This issues with approval of
The Managing Director, KPTCL."*

Yours faithfully,


**Financial Advisor
Regulatory Affairs**

Draft Comments/Suggestions of KPTCL on the Draft Central Electricity Regulatory Commission
(Terms and Conditions of Tariff)(Third Amendment) Regulations, 2022

Sl. No.	As per Draft CERC (Terms and Conditions of Tariff) (Third Amendment) Regulations, 2022	Comments / Suggestions of KPTCL	Reasons
1.	2. Amendment to Clause (4) under Appendix-II "Procedure for Calculation of Transmission System Availability Factor for a Month" of the Principal Regulations: 2.1 New sub-clause (iii) shall be added after sub-clause (ii) of Clause (4) under Appendix-II of the Principal Regulations as under: "(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 for which DICs are not affected by the shutdown of the such transmission Line."	While providing deemed availability certificate for the shutdown period availed by transmission licensees for shifting of their transmission lines for Project(s) of NHAI, Railways and Border Road Organisation , it is to be ensured that the impact of congestion charges and benefit of deemed availability both should not fall on DISCOMs. Hence, it is suggested to include another proviso namely " <i>Provided further that, if Total Transfer Capability (TTC)/ Available Transfer Capability (ATC) of the region is reduced, the RPC shall certify the deemed availability</i> ".	The evacuation lines and elements are meant for transmission of power in the interest of the system security and to provide reliable and quality of power supply to the end consumers. Due to non-availability of the lines/elements, the particular control area will lose flexibility, reliability and ATC/TTC, there by respective control area may be restricted with export / Import capabilities. This may result in DISCOMs to pay additional charges such as congestion charges, Regional Transmission Deviation Account (RTDA) charges etc., or curtail demand/generation, due to this Generators/DISCOMs will lose the revenue without any fault from their side.
2.1,3	3. Amendment to Clause (5) under Appendix-II "Procedure for Calculation of Transmission System Availability Factor for a Month" of the Principal Regulations:		


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