

Ref. No: CE/PP/Tariff Reg/Amend /25194

Date: 27/09/2022

To,
The Secretary,
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110 001.

Subject: MSEDCL Comments on Draft Central Electricity Regulatory Commission
(Terms and Conditions of Tariff) (Third Amendment) Regulations, 2022.

Reference: 1) Draft CERC (Terms and Conditions of Tariff) (Third Amendment)
Regulations 2022.
2) Public notice dated 06.09.2022

Respected Sir,

Hon'ble Central Electricity Regulatory Commission has notified Draft CERC (Terms and
Conditions of Tariff) (Third Amendment) Regulations, 2022.


CERC vide notice dated 06.09.2022 has invited invited comments, suggestions and /or
objections on draft CERC (Terms and Conditions of Tariff) (Third Amendment) Regulations,
2022. Accordingly, MSEDCL is hereby submitting the comments and are attached herewith as

Annexure-A

It is requested that the above MSEDCL comments in the matter. may please be taken on
record & be placed before Hon'ble Commission for kind consideration please.

Thanking You.

Yours faithfully,


Chief Engineer (Power Purchase),
MSEDCL

Copy s.w.r.t.
Director (Commercial) MSEDCL.

Name of Stakeholder: **MSEDCL**

Annexure-A

Sr. No.	Clause No.	Draft Clause	Suggestion of Stakeholder
1	Clause (4) of Appendix II	<p>2.1 New sub-clause (iii) shall be added after sub-clause (ii) of Clause (4) under <i>Appendix-II of the Principal Regulations as under:</i></p> <p><i>“(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;</i></p> <p><i>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.</i></p>	<p>It is suggested that Member Secretary, RPC shall also be entrusted with the responsibility of ensuring that the DICs are not affected by the shutdown of such transmission Line.</p>
2	Clause (v) of Appendix II	<p>Provisos to sub-clause (ii) to Clause (5) under Appendix-II of the Principal Regulations shall be deleted.</p> <p>New sub-clause (iii) shall be added after sub-clause (ii) of Clause (5) under Appendix-II of the Principal Regulations as under:</p> <p><i>“(iii) The outage period which can be excluded for the purpose of sub-clauses (i) and (ii) of this clause shall be declared as under:</i></p> <p><i>a) Maximum upto one month by Member Secretary, RPC</i></p> <p><i>b) Beyond one month and upto three months after decision at RPC</i></p> <p><i>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.”</i></p>	<p>It is a welcome move to involve the Commission for excluding the outage period for more than three months. Beneficiaries can also submit their submission regarding the outage period and Commission can also consult with the concerned beneficiaries. This would increase transparency in the process of restoring the transmission element at the earliest.</p> <p>However, additional proviso may be included in the draft Regulation stating that the Member Secretary, RPC or RPC will take the decision about exclusion of shutdown period only after due consideration of views of the beneficiaries.</p>