



BSES Rajdhani Power Limited

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HOD (PMG)/BRPL/2022-23/1459

Dated 20.09.2022

The Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building
36, Janpath Road
New Delhi 110001

Subject: Comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022

Dear Sir,

With Reference to your public notice dated 18.08.2022, seeking stakeholders comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022, we would like to submit BRPL comments on the same.

Please find enclosed our Comments on the subjected Draft Regulation, enclosed as Annexure-1.

Thanking You,

Yours faithfully
For BSES Rajdhani Power Limited


(Sanjay Srivastav)
Head (Power Management Group)

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Enclosed: Annexure-1

ANNEXURE-1

S No	Regulation No	Draft Amendment) Regulations, 2022 (First	Comments/Suggestions
10.	Amendment to Regulation 12 of the Principal Regulations	(Clause (2) of Regulation 12 of the Principal Regulations shall be substituted as under: “(2) Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for a time block during a billing month shall be computed as under: 1.35 X (transmission charges for GNA of entities located in the State, under first bill for the billing month in Rs.)/ (GNA quantum in MW of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)”	Transmission Deviation Rate is proposed to be 1.35 times of transmission charges/MW/slot. Further the GNA Regulations are still in implementation stage and such high rates at the early stage of implementation of GNA Regulations may increase transmission cost burden of States. Therefore BRPL requests Hon'ble Commission that States should get opportunity to exercise the requirement of GNA quantum for smooth implementation of GNA Regulations and till such time such proposed provision of Transmission Deviations Rate should be put in abeyance.