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To,
The Secretary
Central Electricity Regulatory Commission
Chanderlok Building,
36 Janpath,
New Delhi – 110001,

Fax no. - 011-23753923

Sub: Comments of GUVNL on Draft CERC (Sharing of Inter-State Transmission Charges and Losses) (First Amendment) Regulations, 2022.

Sir,

This has reference to Hon'ble Central Electricity Regulatory Commission (CERC) public notice dated 11.06.2022 issuing Draft CERC (Connectivity and General Network Access to Inter-State Transmission System) Regulations, 2021 and seeking comments / suggestions from stakeholders.

In this regard, GUVNL would like to submit the following comments / views for consideration of Hon'ble CERC:

In the draft amendment, under the clause (1) of the Regulation 11, it is proposed that Short Term / TGNA charges is 1.10 times of transmission charge applicable to GNA, while under the clause (2) of the Regulation 12, it is proposed that the Transmission Deviation Charge by is 1.35 times of transmission charge applicable to GNA.

In this regard, it is submitted that Intra-State entities or Bulk Consumers would be preferred to obtain TGNA for the shorter period and to avoid Long term payment liability of ISTS charges towards GNA, whereas State DISCOMs have committed towards Long Term ISTS / GNA charges. However, when the Intra-State entities or Bulk Consumers will be overdrawing from ISTS network than approved GNA of the State, State DISCOMs being GNA customer(s) will be ending after paying Deviation Charges @ 1.35 times of GNA transmission charge on such overdraw quantum as against TGNA charges i.e. 1.10 times of GNA charges, payable / paid by Intra-State entities or Bulk Consumers. Therefore, it is requested to put TGNA & Transmission Deviation Charges in similarity / at par to avoid any mistreatment.

Thanking You.

Yours faithfully,


(K.P. Jangid)

General Manager (Commerce)