



BSES Yamuna Power Limited

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Ref No: RA/BYPL/2023-24/16

Date: 17.04.2023

To,

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

Sub: Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Second Amendment) Regulations, 2023.

Ref: Hon'ble CERC's Public Notice No. L-1/250/2019/CERC dated 17.03.2023.

Sir,

We write in reference to the aforesaid Public Notice, 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,

Yours faithfully
For BSES Yamuna Power Limited

Sameer Singh
(Authorized Signatory)

Encl: As above

BYPL Comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses)
(Second Amendment) Regulations, 2023.

Regulation No.	Clause	BYPL comments
Regulation 13 Clause 12 (a)	"(12) For the cases other than those covered Clauses (3), (6) or (9) of Regulation 13 of these regulations, the YTC for the inter-State transmission system approved or declared as deemed COD shall be treated as follows: The ISTL shall be paid 20% of YTC of its inter-State transmission system for a period of 6 Months from date of deemed COD	As per the draft, these charges shall be disbursed from charges collected under third bill. in case of shortfall balance will be paid under T-GNA provided further shortfall, the balance shall be paid from deviation and ancillary service pool account under DSM Regulations. However, DISCOM has no role w.r.t execution and commissioning of Transmission lines and associated transmission lines and therefore, charges should not be levied on DISCOM
Regulation 13 Clause 12 (b)	The ISTL shall be paid 100% of YTC of its Inter-state transmission system FROM 7th Months from date of deemed COD	
Regulation 13 Clause 12 (c)	The charges under sub clauses (a) and (b) of this Clause shall be disbursed from charges collected under third bill in terms of Clause (3) of Regulation 12 of these regulations: Provided that in case of shortfall in collection under third bill to meet the requirement of payment under sub-clauses (a) and (b) of this Regulation, the balance shall be paid from charges collected under T-GNA in terms of Clause (3) of Regulation 11 of these regulations: Provided further that in case of shortfall in charges collected under T-GNA to meet the requirement of payment under sub-clauses (a) and (b) of this Regulation, the balance shall be paid from Deviation and Ancillary Service Pool Account under DSM Regulations.	

Regulation 13 Clause 12 (d)	<p>In case an inter-State transmission licensee is responsible for the delay (for any reason including the reason attributable to Force Majeure events) in commencement of power flow in the inter-State transmission system of another inter-State transmission licensee which has achieved deemed COD, inter-State transmission licensee of the delayed inter-State transmission system shall pay 20% of YTC of its transmission system OR 20% of YTC of the transmission system which has achieved deemed COD, whichever is lower, till its delayed inter-State transmission system achieves COD.</p>	
Regulation 13 Clause 12 (e)	<p>In case an intra-State transmission licensee is responsible for the delay (for any reason including the reason attributable to Force Majeure events) in commencement of power flow in the inter-State transmission system of an inter-State transmission licensee which has achieved deemed COD, intra-State transmission licensee of the delayed intra-State transmission system shall pay 20% of YTC of the inter-State transmission system which has achieved deemed COD, till its delayed intra-State transmission system achieves COD.</p>	