

No: PCKL/A12/5/2023-24/ 369

17 APR 2023

**The Secretary,
Central Electricity Regulatory Commission,
3rd and 4th Floor,
Chandralok Building,
36, Janpath, New Delhi – 110001.**

Sir,

**Sub: Central Electricity Regulatory Commission (Sharing of
Inter-State Transmission charges and Losses)
Regulations, 2020– reg**

Ref: No. L-1/250/2019/CERC Dated: 17.03.2023.

With reference to above, PCKL wish to submit the following comments on Central Electricity Regulatory Commission (Sharing of Inter-State Transmission charges and Losses) Regulations, 2020 for kind consideration.

- 1) As per Clause (a) of Regulation 6 of the Tariff Regulation, 2019 provides that where the generating station has not achieved the commercial operation as on the date of commercial operation of the associated transmission system, then generating company shall be liable to pay the transmission charges of associated transmission system as per the tariff determined by Commission under Regulation 14.

Therefore, the clause needs to be modified in case generating station has not achieved the scheduled CoD, the 20% of YTC shall be paid by the generating company to the transmission licensee.

- 2) The Regulation is silent on the payment of tariff in case of generating station has achieved CoD, then Transmission – Transmission and Transmission – Upstream / Downstream connecting Transmission System of the STU has not achieved CoD, the charges payable by transmission licensee shall be the fixed charges and energy charges of the generating company as determined by the CERC or as per the tariff discovered through competitive bidding.

- 3) In case of tariff determined under section 62, only debt repayment and O&M cost shall be considered.

Yours faithfully


Managing Director, 17/4/23
PCKL, Bengaluru.