

West Bengal State Electricity Distribution Company Limited
(A Government of West Bengal Enterprise)

Vidyut Bhavan (4th floor) DJ Block, Sec-II Salt Lake, Kolkata- 700 091
CIN: U40109WB2007SGC113473, Web: www.wbsedcl.in,
e-mail: cereg.wbsedcl@gmail.com
Telephones : 2359-8391, Extn - 364 Fax: 033-2334-5862
Regulation Cell

Memo. No. : REG/CERC/ 96

Date :17/04/2023

To
The Secretary, CERC,
3rd & 4th Floor,
Chanderlok Building, 36, Janpath,
New Delhi-110001.

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

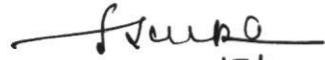
Ref: Memo No. L-1/250/2019/CERC dated 17.03.2023 of CERC.

Sir,

With refernce to above comments of WBSEDCL on the draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Second Amendment) Regulations, 2023 is attached for your consideration, please.

Encl: As stated

Yours faithfully,



(S. Sarkar) 17/4/23
Chief Engineer (Regulation)

Views of West Bengal State Electricity Distribution Company Limited (WBSEDCL) on Draft CERC (Sharing of Inter-State Transmission Charges and Losses)(Second Amendment) Regulations, 2023.

Clause No.	Description	Views/Comments
5 (2) (c)	<p>Clause 12 of Regulation 13 of the Principal Regulations shall be substituted as under"</p> <p>“(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:</p> <p>.....</p> <p>(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:</p> <p>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:</p> <p>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.”</p>	<p>These pool accounts are linked to the operational performance of DICs/Beneficiaries for adherence to strict grid discipline. So it may not be used for such payment described under sub clause(c) of clause (12) of the Shearing Regulation.</p> <p>Therefore it is proposed that it should be realized from the Licensee for which actual delay in commencement of power flow occurred. Accordingly, this clause may be modified.</p>
5 (2) (d)	“(d) In case an inter-State transmission	Interstate/Intra state transmission


 17/4/23
 Chief Engineer (Regulation)
 Regulation Department
 WBSEDCL

<p>and (e)</p>	<p>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> <p>(e) 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>	<p>licensee of delayed transmission system will pay 20% of YTC of transmission system till it achieves COD even if COD is delayed beyond 6 months only 20% of YTC of transmission system will be paid by the transmission licensee with delayed COD.</p> <p>Therefore it is proposed that beyond 6 months of delay in COD Transmission licensee who responsible for delay should pay 100% of YTC of the transmission system till its achieves COD. Accordingly, these clauses may be modified.</p>
----------------	---	--


 17/4/23
 Chief Engineer (Regulation)
 Regulation Department
 WBSEDCL