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Electricity

**AEML-D/CERC/Comments on Draft CERC (Transmission License) Regulations,
2013/01**

December 18, 2023

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

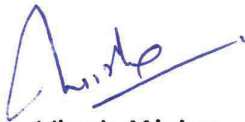
Dear Sir,

**Sub: Submission of comments on Draft Central Electricity Regulatory
Commission (Procedure, Terms and Conditions for grant of Transmission
Licence and other related matters) Regulations, 2023**

Ref: Public Notice dated 28.11.2023

Please find enclosed herewith Adani Electricity Mumbai Ltd. (AEML) comments on Draft Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of Transmission Licence and other related matters) Regulations, 2023.

**Thanking You,
Yours faithfully,**



**Vivek Mishra
Addl. Vice-President, Business – Regulatory,
Adani Electricity Mumbai Ltd.**

Encl: As above.

Adani Electricity Mumbai Ltd. (AEML), operating as a Distribution Licensee in Mumbai, is submitting its comments on the Draft Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of Transmission License and other related matters) Regulations, 2023.

Sr. No.	Reg No. (As per 2009 Regulations)	Proposed edit / addition to Draft Transmission License Regulations,2023	Justification / Rationale
1.	2. Definition (f) "bulk consumer"	"bulk consumer" shall have the same meaning as defined in the Central Electricity Authority (Technical Standards for Connectivity to the Grid) Regulations, 2007 and seeking connectivity to the ISTS at Extra High Voltage;	As per the referred CEA Regulations, Bulk Consumer is only defined as a consumer connected at a voltage level of 33kV or above. However, for 50 MW and above load, the consumer will necessarily be connected at EHV level. Hence, the proposed addition to the definition
2.	2. Definition (j) "connecting transmission line"	"connecting transmission line" means the transmission line, together with any step-up and step-down transformers, switchgear and other works as necessary for connecting a bulk consumer or a distribution licensee, with a load of 50 MW and above, from an ISTS sub-station to its sub-station for carrying electricity for its own consumption or for supplying electricity to the consumers in its area of supply, as the case may be.	<p>The Regulations permit a Distribution Licensee to seek connectivity to the ISTS. However, 50 MW or above load can be served at EHV level only, which means that the connecting transmission line in case of a distribution licensee's connectivity, ought to be EHV. However, a EHV line cannot directly connect to a distribution substation (because it requires at max a 33kV incoming). Hence, intermediate 220/132/33kV substation and associated switchgear, etc. shall also be required to be part of the connecting apparatus.</p> <p>Furthermore, the proposed definition gels with the definition of "transmission line" as per Electricity Act 2003, which also provides line in addition to step-up/step-down transformers and switchgear, etc.</p>
3.	4. Eligibility for Grant of licence	To be added after point (c):	Distribution Licensee is allowed direct connectivity to the ISTS. Therefore, in order to be able to connect to the ISTS, the connecting

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		(d) an entity which has executed an agreement with a distribution licensee with a load of 50 MW or above seeking connectivity to the ISTS	transmission line (as per modified definition suggested herein) shall have to be constructed, operated and maintained by a transmission licensee. Therefore, the entity which undertakes development of such connecting transmission line also needs to be eligible for transmission license under these Regulations.
4.	8. Determination of Transmission Charges	6. (3) The connecting transmission line for a bulk consumer shall be constructed, maintained and operated at the cost of such bulk consumer, if such transmission line is dedicated in nature and not utilized by any other entity.	Dedicated transmission line is built for point-to-point transmission, in case any other entity utilizes the connecting transmission line constructed, maintained operated by the bulk consumer, such connecting transmission line does not remain dedicated anymore. Thus, cost for such line needs to be part of the common pool.
5.	Form I: 2. Particulars of the Project for which licence / Amendment in licence (list of existing elements and proposed addition /deletion element in case)is being sought:	(c) Agreements with Identified Long-term transmission customers or CTU for the Project or distribution licensee, as applicable:	As per rationale provided in Sr. No. 3 above.