

Ref: MUL/CERC/2023-24/18122023

Date: December 18, 2023

To,

The Secretary,
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building, 36,
Janpath,
New Delhi – 110 001.

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

Respected Sir,

With reference to the comments invited by the Hon'ble Central Electricity Regulatory Commission on Draft Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of Transmission Licence and other related matters) Regulations, 2023, we hereby submit our comments on the same (Annexed as Annexure-I).

Kindly acknowledge receipt of the same and request to take the same on record.

Thanking you,

Yours sincerely,

For **MPSEZ Utilities Limited,**


Authorized Signatory

MPSEZ Utilities Limited comments on CERC Draft (Procedure, Terms and Conditions for grant of Transmission License and other related matters) Regulations, 2023.

Annexure-1

Sr. No.	Reg No. (As per 2009 Regulations)	CERC Transmission License Regulations, 2009	Draft Transmission License Regulations, 2023	Comments
1.	2. Definition	(b) "agreement" means the agreement, contract, memorandum of understanding, or any other covenant on any aspect relating to the inter-State transmission of electricity, entered into between the licensee, the long-term customers and the Central Transmission Utility or the deemed licensee;	(b) "agreement" means and includes an agreement, contract, memorandum of understanding, or any other covenant in writing on any aspect relating to the interState bulk transmission of electricity, entered into between the licensee and the Long-Term Transmission Customer(s) or the Central Transmission Utility or distribution licensee as the case may be;	ISTS Transmission Licensee may have to enter into an agreement within the State (where CTU transmission network already exists) for distribution licensee seeking connectivity for 50 MW and above load at nearest available transmission voltage. Also "connecting transmission line" definition includes distribution licensee. Such connection or extension of transmission line required for distribution licensee needs to be included under existing transmission license.
2.	6. Eligibility for Grant of licence	No Provision	To be added next to point (c): (d) has signed agreement with distribution licensee seeking connectivity for 50 MW and above load at nearest available transmission voltage.	Since, distribution licensee is allowed to be connected to ISTS system, the entity which undertakes development required for such connectivity also needs to be eligible for license.
3.	8. Determination of Transmission Charges	No Provision	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 bulk consumer, in such case connecting transmission line does not remain dedicated in nature. Thus, cost to be part of common pool.

MPSEZ Utilities Limited comments on CERC Draft (Procedure, Terms and Conditions for grant of Transmission License and other related matters) Regulations, 2023.

Sr. No.	Reg No. (As per 2009 Regulations)	CERC Transmission License Regulations, 2009	Draft Transmission License Regulations, 2023	Comments
4.	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 given under Sr. No.2