

Email**Mukesh Kumar**

Fwd: Comments on Transmission License Regulation- reg

From : Shilpa Agarwal <shilpa@cercind.gov.in> Mon, Dec 18, 2023 04:11 PM
Subject : Fwd: Comments on Transmission License Regulation- reg 📎 1 attachment
To : Mukesh Kumar <mukeshkr.cea@gov.in>, ramakant ece <ramakant.ece@gmail.com>, Awdhesh Kumar Yadav <awdhesh@nic.in>

----- Forwarded Message -----

From: Amit Aggarwal <Amit.Aggarwal@ril.com>
To: Harpreet Singh Pruthi <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>
Sent: Mon, 18 Dec 2023 15:25:27 +0530 (IST)
Subject: Comments on Transmission License Regulation- reg

Dear Sir/ Madam,

Subject: Suggestions -Draft CERC (Procedure, Terms and Conditions for grant of Transmission Licence and other related matters) Regulations, 2023.

In response to your public notice dated 28th November-2023 inviting suggestions and comments from the stakeholders on 'Draft CERC (Procedure, Terms and Conditions for grant of Transmission Licence and other related matters) Regulations, 2023', we would like to submit our comments as per the enclosed Annexure-I for your kind consideration.

Thanking you.

Yours faithfully,

for Reliance Industries Limited

Amit Aggarwal

Sr Vice President & Head- Regulatory Affairs (Energy)

Reliance Industries Limited

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 **Annexure 1- Comments on Transmission License Regulation.pdf**
240 KB

Annexure-I:- Suggestions – Suggestions –Draft CERC (Procedure, Terms and Conditions for grant of Transmission Licence and other related matters) Regulations, 2023.

. No.	Para no.	Proposed draft	Comments on the draft / Suggestion	Justification for the Comments/ Suggestion
1.	Para No. 4 (c)	<p>4. Eligibility for Grant of licence (c)</p> <p>a bulk consumer, with a load of 50 MW and above, who intends to draw electricity for the purpose of self-consumption by constructing a connecting transmission line from the ISTS sub-station to its premises.</p> <p>Explanation: - a bulk consumer shall also be eligible to get its connecting transmission line constructed, maintained and operated by a transmission licensee instead of seeking the transmission licence itself by amendment of the transmission licence of such licensee.</p>	<p>We request the Hon'ble commission to modify the said clause as below:</p> <p>a bulk consumer, with a load of 50 MW and above, who intends to draw electricity for the purpose of self-consumption by constructing a connecting transmission line from the ISTS sub-station to its premises or a SPV set up by such bulk consumer or a SPV set up by parent company of such bulk consumer for the purpose of laying connecting transmission line shall also be eligible to get transmission license.</p> <p>Explanation: - a bulk consumer or a SPV set up by such bulk consumer or a SPV set up by parent company of such bulk consumer shall also be eligible to get its connecting transmission line constructed, maintained and operated by a transmission licensee instead of seeking the transmission licence itself</p>	<p>The proposed regulation allows a bulk consumer to seek the transmission licence to construct the connecting transmission line to draw electricity from ISTS substation for purpose of self-consumption.</p> <p>A bulk consumer should be allowed to construct the connecting transmission lines through a SPV of bulk consumer or parent company of bulk consumer in order to keep separate accounts for Transmission licensee and easier compliances and to keep the business of transmission separate as the same is specialised separate business.</p>

Annexure-I:- Suggestions – Suggestions –Draft CERC (Procedure, Terms and Conditions for grant of Transmission Licence and other related matters) Regulations, 2023.

. No.	Para no.	Proposed draft	Comments on the draft / Suggestion	Justification for the Comments/ Suggestion
			by amendment of the transmission licence of such licensee.	
2.	Para No. 5	5. Procedure for Grant of Licence	We request the Hon'ble commission to provide for separate provisions related to procedure for grant of transmission licence to bulk consumer with reduced overall procedural timeline to issue the License.	<p>The connecting Transmission line for Bulk consumer for the purpose of CTU connectivity is like dedicated line for Generating Companies as the entire cost of construction, maintenance and operation of connecting transmission lien will be borne by bulk consumers and no other stakeholders (Other consumers, DISCOMs, TRANSCOMs) are affected by the cost or any other aspect because of bulk consumer getting transmission license to construct connecting transmission lines.</p> <p>Accordingly, construction of dedicated transmission line by a bulk consumer should be considered at par with that of a generating station.</p> <p>Hence the procedure for granting transmission license to Bulk consumer shall be separate procedure with reduced timeline as the same is not subject to stringent regulatory compliances unlike transmission licensee who is building such lines for transmission utilities.</p>