

Email**Mukesh Kumar**

Fwd: TPL Comments - CERC Transmission Licence Regulations

From : Shilpa Agarwal <shilpa@cercind.gov.in>
Subject : Fwd: TPL Comments - CERC Transmission Licence Regulations
To : Mukesh Kumar <mukeshkr.cea@gov.in>, ramakant ece <ramakant.ece@gmail.com>, Awdhesh Kumar Yadav <awdhesh@nic.in>

Sun, Dec 17, 2023 08:00 AM

 1 attachment 

From: JIGNESHLANGALIA@torrentpower.com
To: "Harpreet Singh Pruthi" <secy@cercind.gov.in>, "Shilpa Agarwal" <shilpa@cercind.gov.in>
Cc: chetanbundela@TORRENTPOWER.COM, lunapal@TORRENTPOWER.COM, mihirthakkar@torrentpower.com
Sent: Saturday, December 16, 2023 6:34:53 PM
Subject: TPL Comments - CERC Transmission Licence Regulations

Dear Sir,

This has reference to the public notice dated 28th Nov, 2023 issued by the Hon'ble Commission inviting comments/suggestions on the Draft Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of Transmission Licence and other related matters) Regulations, 2023.

In this regard, TPL takes this opportunity to submit its comments/suggestions for the kind consideration of the Hon'ble Commission. A copy of our comments/suggestions is enclosed herewith.

We request the Hon'ble Commission to kindly give due consideration to our comments/suggestions for finalizing the Regulations.

Thanking You.

Jignesh Langalia
TPL

Disclaimer : This email along with any attachments may contain confidential, proprietary or legally privileged information and is for the intended recipient only. Any other use of email, such as, unauthorized access, disclosure, copying, distribution or reliance on any contents of it by anyone else is prohibited and unlawful. If you are not the intended recipient, please notify the sender immediately and delete the email. Disclaimer : This email along with any attachments may contain confidential, proprietary or legally privileged information and is for the intended recipient only. Any other use of email, such as, unauthorized access, disclosure, copying, distribution or reliance on any contents of it by anyone else is prohibited and unlawful. If you are not the intended recipient, please notify the sender immediately and delete the email.



TPL Comments_CERC Licence Regulations 2023.pdf

131 KB

Torrent Power Ltd-Comments/Suggestions on Draft CERC (Procedure, Terms and Conditions for grant of Transmission Licence and other related matters) Regulations 2023

Clause No.	CERC-Draft Regulation	Proposed Amendment in Draft	TPL Submission
2(j)	(j) "Connecting transmission line" means the transmission line 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.	The draft clause may be amended as below: (j) "Connecting transmission line" means the transmission line 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.	Similar to Generating Company, licensees can also connect with ISTS basis the requirement of Connectivity /GNA. Further, the Electricity Act already defines "distribution system" as the system of wires and associated facilities between the delivery points on the transmission lines or the generating station connection and the point of connection to the installation of the consumers. It is important to note that there is no bar in the Act to lay distribution network of Extra High Voltage. Accordingly, at present, the distribution licensees lay EHV Network as well to source power from ISTS/ InSTS network and same is part of distribution licensed business. Hence, we request that distribution licensee should not be included in definition of connecting transmission line as same would be contradictory to the Act. Same will also help to avoid any disputes/ambiguity. Based on above, the Hon'ble Commission is requested to make the amendment as suggested.
2(q)	(q) Long Term Transmission Customer" or "LTTC" means a person, who has entered into the Transmission Service Agreement (TSA) for availing or intending to avail access to the Inter-State Transmission System under the provisions of the TSA issued under competitive bidding guidelines.	The draft clause may be amended.	The definition restricts only those users of ISTS who have entered into TSA or intending to avail access of ISTS under the provisions of TSA issued under Bidding Guidelines. However, there are other users as well (i.e. in addition to Bidding route) of ISTS who have availed long term Open access under earlier regime and converted the same into GNA or new applicant to avail GNA. Even CERC Tariff Regulations have defined LTTC as a person availing or intending to avail access to the inter-state transmission system for a period of twenty-five years or more i.e. the definition is associated with the period of the open access. With implementation of GNA Regulations, all the existing Long Term Transmission Customers became GNA Holders. Accordingly, Hon'ble Commission is requested to make necessary correction in the definition and at other places where LTTC is referred to avoid ambiguity.
10(2)	(2) If the useful life of the transmission asset (other than for connecting transmission line to bulk consumer) for which the transmission licence has been issued extends beyond the period of 25 years, the Commission may consider the merit of each case to grant a licence for another term for which the licensee may make an application in accordance with Regulation 7 of these regulations two years before the expiry of the initial period of licence:	The draft clause may be amended.	As per Rule 4(c) of Electricity (Amendment) Rule, 2023 dated 30.06.2023, license granted under section 14 of Electricity Act shall be deemed to be renewed unless the same is revoked. Hence, after completion of initial period of 25 Years, licence stands renewed as per Rules. Under the circumstances, Suggested clause is contradictory to the MOP Rules. Accordingly, it is suggested that proposed draft regulation may be appropriately amended.