



Date: 02 Dec 2024

**The Secretary
Central Electricity Regulatory Commission
7th Floor, World Trade Centre
Tower B, Naurojinagar,
New Delhi-110029**

**Sub: Submission of comments/suggestions on Staff Paper on modifications in the
Central Electricity Regulatory Commission (Connectivity and General Network
Access to the inter-State Transmission System) Regulations.**

Ref: CERC notification No. L-1/261/2021/CERC Dated: 09.10.2024

Dear Sir,

On behalf of '**MPSEZ Utilities Limited**' (MUL) a distribution licensee in the state of Gujarat, we hereby submit our comments & suggestions, as enclosed with **Annexure-I**, on the staff paper for suitable consideration while proposing the amendment/modifications to the Connectivity and General Network Access to the Inter-State Transmission System Regulations.

Yours sincerely,
For **MPSEZ Utilities Limited**,

Authorized Signatory

Encl. As above

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#	Question in Staff Paper	Answer/ Suggestion to the Question	Rational
1	<p>Issue No. 4:</p> <p>"12.5. In case of an entity covered under Regulation 17.1(iii), the line to connect such an entity to the ISTS and necessary augmentation for providing connection to the ISTS, shall be constructed and maintained by a licensee at the cost of such entity."</p>	<p>"12.5. In case of an entity covered under Regulation 17.1(iii), the line to connect such an entity to the ISTS and necessary augmentation for providing connection to the ISTS, shall be <u>part of the ISTS system and the cost of same should also be part of the ISTS plan constructed and maintained by a licensee at the cost of such entity.</u></p> <p>Suggestion:</p> <p>As a private distribution licensee, we propose that unlike the other Distribution licensee who are not connected with the ISTS system, the cost for last mile connectivity should not be on the distribution licensee seeking to connect to ISTS, instead the same cost <u>should also be part of the ISTS plan.</u></p>	<p>As per the existing provision, the line to connect the entity covered under Regulation 17.1(iii) to ISTS and necessary augmentation for providing such connection shall be constructed and maintained by a licensee at the cost of such an entity which is discriminatory and will discourage any distribution licensee seeking to connect to ISTS, directly under clause 17.1 (iii).</p> <p>We propose that unlike the other Distribution licensee who are not connected with the ISTS system, the cost for last mile connectivity should not be on the distribution licensee seeking to connect to ISTS, instead the same cost should also be part of the ISTS plan.</p>