

भारत सरकार/ Government of India विद्युत मंत्रालय/ Ministry of Power केन्द्रीय विद्युत प्राधिकरण/ Central Electricity Authority आर. ए. प्रभाग / Regulatory Affairs Division

Τo,

सचिव (सी.ई.आर.सी.), केंद्रीय विद्युत विनियामक आयोग, 6वीं, 7वीं और 8वीं मंजिल, टावर बी, वर्ल्ड ट्रेड सेंटर, नई दिल्ली-110029

## Subject: Comments on Central Electricity Regulatory Commission (Cross Border Trade of Electricity) (Second Amendment) Regulations, 2024 - regarding.

Sir,

Reference is invited to CERC letter dated 09.01.2025 & public notice dated 31.12.2024 vide which CERC has issued draft Central Electricity Regulatory Commission (Cross Border Trade of Electricity) (Second Amendment) Regulations, 2024 for inviting comments/suggestions/objections from stakeholders.

Its worth mentioning that cross border related matters are sovereign in nature, and Govt. of India guidelines , in this regard, need to be followed in the letter and spirit. The MoP has issued Guidelines for Import/Export (Cross Border) of Electricity 2018 and all regulations should be inline with these guidelines. The guidelines are available on MoP's website and the link is given below:

https://powermin.gov.in/sites/default/files/uploads/Guidelines\_for\_ ImportExport\_Cross%20Border\_of\_Electricity\_2018.pdf.

Accordingly, the comments of CEA on draft Central Electricity Regulatory Commission (Cross Border Trade of Electricity) (Second Amendment) Regulations, 2024 are attached at **Annexure I.** Further, some comments on some provisions of the Principal Regulations which are not proposed to be amended but appear to be in deviation from the guidelines issued by MoP, are also attached at **Annexure II**.

भवदीय,

(विक्रम सिंह /Vikram Singh) मुख्य अभियंता (आर.ए.)/ Chief Engineer (RA) Copy to:संयुक्त सचिव (Trans), विद्युत मंत्रालय, श्रम शक्ति भवन, नई दिल्ली

## Comments on Central Electricity Regulatory Commission (Cross Border Trade of Electricity) (Second Amendment) Regulations, 2024

S.No.	Para No.	Regulation No.	Principal Regulation	Draft Second Amendment	Suggested Modification	Remarks
1.	2(2)	2(1)(e)	'Applicant' means an entity located in neighbouring country who has been recognized as a Participating Entity as defined in these regulations;	'Applicant' means an entity located in neighbouring country who has been recognized as a Participating Entity as defined in these regulations or an electricity trading licensee of India	'Applicant' means an entity located in India who has been recognized as a Participating Entity as defined in these regulations or an electricity trading licensee of India.	There is no provision in the Guidelines For Import / Export (Cross Border) of Electricity- 2018 for directly connecting neighbouring country generator to Indian grid.
2.	2(10)	2(1)(s)	'Cross Border Transmission Link' or 'CBTL' means the transmission link from the pooling station within India till the pooling station of a neighbouring country, as may be specified by the Designated Authority in consultation with the Transmission Planning Agency of any of the neighbouring countries and shall include the dedicated transmission line from the generating station located within the territory of a neighbouring country getting connected with the Indian grid;	"Cross Border Transmission Link' or 'CBTL' means the transmission link from the pooling station within India till the pooling station of a neighbouring country, as may be specified by the Designated Authority in consultation with the Transmission Planning Agency of any of the neighbouring countries for electricity and shall include the dedicated transmission line from the generating station or a drawee facility (i) located within the territory of a neighbouring country getting connected with	"Cross Border Transmission Link' or 'CBTL' means the transmission link from the pooling station within India till the pooling station of a neighbouring country, as may be specified by the Designated Authority in consultation with the Transmission Planning Agency of any of the	Guidelines For Import / Export (Cross Border) of Electricity- 2018 provided Generating Station of India to connect with neighbouring country not vice-versa.

S.No.	Para No.	Regulation No.	Principal Regulation	Draft Second Amendment	Suggested Modification	Remarks
				the Indian grid or (ii) located within the territory of India getting connected with the grid of the neighbouring country;"	neighbouring countries for electricity and shall include the dedicated transmission line from the generating station located within the territory of India getting connected with the grid of the neighbouring country;"	
3.	2(11)	2(1)(u)	'Dedicated Transmission System' means the transmission system developed by a Participating Entity for transmitting electricity from a generating station located in a neighbouring country to a specified point in the Indian grid;	"Dedicated Transmission System' means (i) the transmission system developed by a Participating Entity for transacting electricity between a generating station or a drawee facility located in a neighbouring country to a specified point in the Indian grid or (ii) the transmission system developed by a Participating Entity for transacting electricity between a generating station or a drawee facility located in the Indian grid to a specified point located in a neighbouring country or (iii) transmission system to connect, with Indian Grid under Regulation 10(7) of these	"Dedicated Transmission System' means (i) the transmission system developed by a Participating Entity for transacting electricity between a generating station located in the India to a specified point located in a neighbouring country or (ii) transmission system to connect, with Indian Grid	Guidelines For Import / Export (Cross Border) of Electricity- 2018 provided Generating Station of India to connect with neighbouring country not vice-versa. Further guidelines does not provide to connect Drawee facility directly.

S.No.	Para No.	Regulation No.	Principal Regulation	Draft Second Amendment	Suggested Modification	Remarks
				regulations for a generating station located in India but electrically directly connected to a neighbouring country;"	under Regulation 10(7) of these regulations for a generating station located in India but electrically directly connected to a neighbouring country;"	
4.	3(1)	3(1)	These regulations shall be applicable to the Participating Entities in India and the neighbouring countries which are engaged in cross border trade of electricity with India. Provided that the entities located in India who are seeking connectivity or long term access or medium-term open access or short-term open access to the Indian grid in the course of cross border trade of electricity between India and any of the neighbouring countries shall continue to be governed by Connectivity Regulations and the STOA Regulations.	These regulations shall be applicable to the Participating Entities in India and the neighbouring countries which are engaged in cross border trade of electricity with India. Provided that the entities located in India who are seeking connectivity or long term access or medium-term open access or short-term open access to the Indian grid in the course of cross border trade of electricity between India and any of the neighbouring countries shall continue to be governed by Connectivity Regulations and the STOA Regulations and the SNAs.	Words " <b>and the</b> <b>STOA</b> <b>Regulations</b> " may be deleted	STOA Regulations are repealed
5.	6(1)	7(2)	(2) The manner of implementation of Cross Border Transmission Link between the pooling station within India till the Indian border and the implementing agency shall be	(2) The manner of implementation of Cross Border Transmission Link covered under Clause (1) of this Regulation, between the pooling	(2-i) A participating entity having a generating station located in India may develop,	Guidelines For Import / Export (Cross Border) of

S.No.	Para No.	Regulation No.	Principal Regulation	Draft Second Amendment	Suggested Modification	Remarks
			decided by Government of India. Provided that a participating entity having a generating station located in a neighbouring country may develop, operate and maintain the dedicated transmission system from the generating station to the pooling station within India at its own cost after obtaining all the necessary approvals from respective countries.	station within India till the Indian border and the implementing agency shall be decided by the Government of India. (2-i) A participating entity having a generating station or a drawl facility located in one country may develop, operate, and maintain the dedicated transmission system from their generating station or drawl facility to the pooling station of a neigbouring country at its own cost after obtaining all the necessary approvals from respective countries: Provided that spare capacity in the dedicated transmission system can be utilized by other entities under open access, subject to payment of transmission charges as per Regulation 30 (1) of these regulations.	operate, and maintain the dedicated transmission system from their generating station to the pooling station of a neigbouring country at its own cost after obtaining all the necessary approvals from respective countries.	Electricity- 2018 provided Generating Station of India to connect with neighbouring country not vice-versa. Further guidelines does not provide to connect Drawee facility directly. Provisio of (2-i) may be deleted as the link can be be utilized by other entities only if the line is radial to the grid of neighbouring country. If the dedicated link is connected to the grid of neighbouring country feeding radial load, then a generator in India not connected with

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						Indian grid may use it. Otherwise, scheduling etc will be combined on all cross border links not on specific link.
6.	7(2)	8(1)	(1) A Participating Entity located in a neighbouring country shall be required to seek connectivity or long-term access or medium-term open access or short term open access, as the case may be, through separate applications.	<ul> <li>(1) A Participating Entity located in a neighbouring country, for the purpose of injection into or drawl from the Indian grid, shall be required to seek connectivity or GNA or T-GNA, as the case may be, through separate applications:</li> <li>Provided that an electricity trading licensee of India engaged in cross border trade of electricity may seek GNA or T-GNA, in accordance with these Regulations.</li> </ul>	<ul> <li>(1) A Participating Entity located in India, for the purpose of import of electricity, shall be required to seek GNA or T-GNA:</li> <li>Provided that an electricity trading licensee of India engaged in cross border trade of electricity may seek GNA or T- GNA, in accordance with these Regulations.</li> </ul>	Guidelines For Import / Export (Cross Border) of Electricity- 2018 provided Generating Station of India to connect with neighbouring country not vice-versa.
7.	7(5)		A new Clause (4) shall be added after Clause (3)	(4) Connectivity granted under these regulations shall allow connection to the Indian grid but shall not confer any rights towards transmission access (GNA or T-GNA) for the Indian	The clause may be deleted.	The Guidelines -2018 have no provision for connecting a generating station of

S.No.	Para No.	Regulation No.	Principal Regulation	Draft Second Amendment	Suggested Modification	Remarks
				Grid, which shall be required to be obtained separately.		neighbouring country to Indian grid directly.
8.	8(1)	9(1)	The applications for connectivity, long-term access and medium- term open access shall be accompanied by a non-refundable application fee in Indian Rupees as provided below, payable in the name and in the manner to be laid down by the CTU:	The applications for connectivity or GNA shall be accompanied by a non refundable application fee of Rs 5 lac in Indian Rupees, payable in the name and in the manner to be laid down by the CTU.	The applications for GNA shall be accompanied by a non refundable application fee of Rs 5 lac in Indian Rupees, payable in the name and in the manner to be laid down by the CTU.	The Guidelines -2018 have no provision for connecting a generating station of neighbouring country to Indian grid directly.
9.	9(1), 9(2)	10(2)	<ul> <li>(2) The Participating Entity as specified under Clause (1) above shall make an application to CTU for the grant of Connectivity to the Indian grid. In addition to the requirements specified under Connectivity Regulations, the Applicant shall furnish the following:</li> <li>a. Approval from Designated Authority with regard to eligibility of the Participating Entity for cross border trade of electricity or copy of the Inter Government Agreement (IGA) wherever available; and</li> </ul>	The Participating Entity as specified under Clause (1) above shall make an application to CTU for the grant of Connectivity to the Indian grid along with the following: a. Approval from Designated Authority with regard to eligibility of the Participating Entity for cross border trade of electricity or copy of the Inter Government Agreement (IGA) wherever available; and b. Necessary Approvals for implementing the dedicated transmission system.	May be deleted	As there no provision in the Guidelines- 2018 for connecting generating station of neighbouring country in Indian Grid directly.

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			Necessary Approvals for implementing the dedicated transmission system.	Application Bank Guarantee (Conn-BG1) for Rs 50 Lac in Indian Rupees per application		
10.	9(3)	10(3)	<ul> <li>(3) On receipt of the application, the CTU shall process the application and grant Connectivity as per the Detailed Procedure made under Connectivity Regulations. CTU may consult and coordinate with Transmission Planning Agency(ies)of neighbouring countries while processing the application and carry out the necessary inter- connection study as specified in the Central Electricity Authority (Technical Standards for Connectivity to the Grid) Regulations, 2007.</li> </ul>	On receipt of the application, the CTU shall process the application and grant Connectivity as per these Regulations. CTU may consult and coordinate with Transmission Planning Agency(ies)of neighbouring countries while processing the application and carry out the necessary inter-connection study as specified in the Central Electricity Authority (Technical Standards for Connectivity to the Grid) Regulations, 2007.	May be deleted	As there no provision in the Guidelines- 2018 for connecting generating station of neighbouring country in Indian Grid directly.
11.	9(4)	10(4)	<ul> <li>(4) Upon grant of Connectivity, the Applicant shall sign a Connection Agreement with the CTU.</li> <li>Provided that in case Connectivity is granted to the inter-State transmission system of an inter- State transmission licensee other than the CTU, an agreement as provided in the Central Electricity Authority (Technical Standards for Connectivity to the Grid), Regulations, 2007 shall be signed between the Applicant, CTU and</li> </ul>	Upon grant of Connectivity, an agreement as provided in the Central Electricity Authority (Technical Standards for Connectivity to the Grid), Regulations, 2007 shall be signed between the entity which has been granted Connectivity, CTU, and such inter-State transmission licensee to whose inter-State transmission system, the Connectivity has been granted.	May be deleted	As there no provision in the Guidelines- 2018 for connecting generating station of neighbouring country in Indian Grid directly.

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			such inter-State transmission licensee.			
12.	9(5)	10(5)	(5) Grant of Connectivity shall not entitle an applicant to interchange any power with the Indian grid unless it obtains long-term access or medium-term open access or short-term open access for cross border trade of electricity.	Grant of Connectivity shall not entitle an applicant to interchange any power with the Indian grid unless it GNA or T- GNA for cross border trade of electricity.	May be deleted	As there no provision in the Guidelines- 2018 for connecting generating station of neighbouring country in Indian Grid directly.
13.	10(2)	11(1)	The Application for short-term open access to the Indian grid and across the Indian grid for cross border trade of electricity shall be made to NLDC under these Regulations.	The Application for grant of T- GNA to the Indian grid by a Participating entity located in the neighbouring Country or by an electricity trading licensee of India, for the purpose of injection into the Indian grid or drawal from the Indian grid, for cross border trade of electricity shall be made to NLDC under these Regulations, subject to Regulation 6 of these regulations	The Application for grant of T-GNA for import of electricity by India or by an electricity trading licensee of India for the purpose of injection into the Indian grid or drawal from the Indian grid, for cross border trade of electricity shall be made to NLDC under these Regulations, subject to Regulation 6 of these regulations	Guidelines- 2018 do not have such provision for Participating Entity located in neighbouring country.

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14.		10(8)	New Clauses	<ul> <li>(8) Participating Entity located in neighbouring country and getting connected to the Indian grid through dedicated transmission system, shall submit one time connectivity charges for Rs. one lakh per MW for the quantum of connectivity granted, one month prior to a physical connection to the Indian Grid. The one time charges paid by such entity shall be adjusted in Monthly Transmission Charges under the Sharing Regulations.</li> </ul>	Not required. The clause may be deleted.	Guidelines- 2018 do not have such provision for Participating Entity located in neighbouring country.
15.	11(2)	12(1)	The application for long-term access or medium-term open access to Indian grid and across Indian grid for cross border trade of electricity shall be made to CTU.	<ul> <li>The following entities shall be eligible as Applicants to apply for a grant of GNA or for enhancement of the quantum of GNA for injection into the Indian grid or drawal from the Indian grid:</li> <li>a. A Participating Entity located in the neighbouring country;</li> <li>b. An Electricity Trading licensee of India.</li> </ul>	The following entities shall be eligible as Applicants to apply for a grant of GNA or for enhancement of the quantum of GNA: a. Indian Participating Entity for import of electricity; b. An Electricity Trading licensee of India for	Guidelines- 2018 do not have such provision for Participating Entity located in neighbouring country.

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					injection into the Indian grid or drawal from the Indian grid.	
16.	11(3), 11(4)	12(2)	<ul> <li>In addition to the requirements specified under Connectivity Regulations for grant of long-term access or medium-term open access to the Indian grid, the Applicant shall furnish the following: <ul> <li>a. Approval from Designated Authority with regard to eligibility of the Participating Entity for cross border trade of electricity or copy of the Inter Government Agreement (IGA) wherever available; and</li> <li>b. Approval from Designated Authority in India and Competent Authority in neighbouring country(ies) to use Cross Border Transmission Link(s) in case connectivity is not through dedicated transmission lines; and</li> <li>c. Access Bank Guarantee as specified under Regulation 15 for long-term access.</li> </ul> </li> </ul>	<ul> <li>In addition to the requirements specified under GNA</li> <li>Regulations for grant of GNA to the Indian grid, the Applicant shall furnish the following: <ul> <li>a. Approval from Designated Authority with regard to eligibility of the Participating Entity for cross border trade of electricity or copy of the Inter Government Agreement (IGA) wherever available; and</li> <li>b. Approval from Designated Authority in India and Competent Authority in neighbouring country(ies) to use Cross Border Transmission Link(s) in case connectivity is not through dedicated transmission lines; and</li> <li>c. Application Bank Guarantee (GNA-BG2) as specified</li> </ul> </li> </ul>	Clause no 12(2)(b) may be deleted	GNA/T-GNA to be allowed on available transfer capacity including all links with a country, not a specific link.

S.No.	Para No.	Regulation No.	Principal Regulation	Draft Second Amendment	Suggested Modification	Remarks
				under Regulation 15 for GNA.		
17.	13(1)	14(3)	(3) In case of delay in commissioning of generating station or unit(s) thereof and associated dedicated transmission system in the neighbouring country beyond the scheduled date agreed in the Long Term Transmission Access Agreement, the generator shall be liable to pay full transmission charges from the date of operationalisation of long- term access.	<ul> <li>(3) In case of delay in achieving commercial operation date of generating station or unit(s) thereof and associated dedicated transmission system in the neighbouring country beyond the scheduled date agreed in the GNA Agreement, the generator or the trading licensee which has obtained GNA for the purpose of injection into the Indian Grid shall be liable to pay I transmission charges as under:</li> <li>a) In case where augmentation has been taken up under ISTS for grant of such GNA for the purpose of injection into the Indian Grid, the Yearly transmission charges for such augmentation which has achieved COD proportionate to the quantum of GNA from the date of effectiveness of GNA till the generating station or unit thereof achieves COD.</li> </ul>	<ul> <li>(3) In case of delay in generation beyond the scheduled date agreed in the GNA Agreement, the trading licensee which has obtained GNA for the purpose of injection into the Indian Grid shall be liable to pay transmission charges as under:</li> <li>a) In case where augmentation has been taken up under ISTS for grant of such GNA for the purpose of injection into the Indian Grid, the Yearly transmission charges for such augmentation</li> </ul>	Modified according to the Guidelines 2018

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					which has achieved COD proportionate to the quantum of GNA from the date of effectiveness of GNA.	
18.	13(2)	14(5)	<ul> <li>(5) In the event of delay by the transmission licensee in commissioning of transmission system within India beyond its scheduled date and the generating company is ready with its generating station or unit(s), the transmission licensee shall pay transmission charges to generating company proportionate to commissioned generation capacity in case no alternative arrangement is made by the CTU.</li> <li>Provided that in case of non-payment of transmission charges by the transmission licensee to the generating company, such charges shall be recovered by the CTU from the Contract</li> <li>Performance Guarantee furnished by the transmission licensee and paid to the generating company.</li> </ul>	(5) In the event of delay by the transmission licensee in commissioning of the transmission system within India beyond its scheduled date and the generating company is ready with its generating station or unit(s), the transmission licensee shall pay transmission charges (which such transmission licensee would have received after achieving COD) to generating company or the trading licensee on behalf of such generating company, proportionate to generation capacity which has achieved commercial operation, in case no alternative arrangement is made by the transmission licensee in consultation with CTU to evacuate the power of such generating station:	(5) In the event of delay by the transmission licensee in commissioning of the transmission system within India beyond its scheduled date and the generation is ready the transmission licensee shall pay transmission charges (which such transmission licensee would have received after achieving COD) to the trading licensee, proportionate to generation capacity which is	There is no provision in the Guidelines- 2018 for connecting generating station of neighbouring country in Indian Grid directly.

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				Provided that in case of non- payment of transmission charges by the transmission licensee to the generating company or the trading licensee, as the case may be, such charges shall be recovered by the CTU from the Contract Performance Guarantee furnished by the transmission licensee and paid to the generating company.	available, in case no alternative arrangement is made by the transmission licensee in consultation with CTU to evacuate the power of such injection: Provided that in case of non- payment of transmission charges by the transmission licensee to the trading licensee, such charges shall be recovered by the CTU from the Contract Performance Guarantee furnished by the transmission licensee and paid to the trading	
19.	14(6)	15(5), 15(6), 15(7)	(5) In case there is delay in commissioning of the generating	(5) In case there is a delay in the commissioning of the	licensee. (5) In case there is a delay in the	Modified in line with regulation
		10(0), 10(1)	station and associated dedicated	generating station and	injection beyond	14(3)

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			transmission system beyond the timelines agreed in the Long Term Transmission Access Agreement, and long-term access has been operationalized, the transmission charges if not paid by the generator as provided in Clause (3) of Regulation 14, shall be recovered by CTU by encashing the Access Bank Guarantee submitted in terms of Clause (1) or Clause (2), as the case may be. (6) If a Cross Border Customer relinquishes Transmission Access granted under these Regulations after operationalization of long term access, Access Bank Guarantee submitted in terms of Clause (1) or Clause (2), as the case may be, shall be encashed by the CTU subject to Clause (7) of this Regulation. (7) The quantum of Access Bank Guarantee submitted in terms of Clause (1) or Clause (2), as the case may be, shall be progressively reduced each year after the generating company begins to avail long term access corresponding to one fifth of its total value. On completion of each	associated dedicated transmission system beyond the timelines agreed in the GNA Agreement, and GNA has been operationalized, the transmission charges if not paid by the Cross Border Customer as provided in Clause (3) of Regulation 14, shall be recovered by CTU by encashing the Access Bank Guarantee submitted in terms of Clause (1) or Clause (2), as the case may be.	the timelines agreed in the GNA Agreement, and GNA has been operationalized, the transmission charges if not paid by the Cross Border Customer as provided in Clause (3) of Regulation 14, shall be recovered by CTU by encashing the Access Bank Guarantee submitted in terms of Clause (1) or Clause (2), as the case may be.	

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			year, one fifth of the value of Access Bank Guarantee shall be returned to the Applicant each year up to fourth year and one-fifth of the Access Bank Guarantee shall be retained upto twelfth year of the long term access as a security towards relinquishment charges. The Applicant shall submit revised Access Bank Guarantee accordingly.			
20.	23(1)	30(1)	(1) PoC injection charges or PoC withdrawal charges for delivery of electricity at the pooling station within India shall be governed as per provisions of Sharing Regulations.	<ul> <li>(1) (a) Transmission charges towards the use of ISTS of India shall be payable for drawl from Indian Grid by Cross Border Customer as per provisions of the Sharing Regulations.</li> <li>(b) The transmission charges for the Cross Border Transmission Link(s) covered under Clauses</li> <li>(1) and (2) of Regulation 7 of these regulations shall be payable as per Government to Government negotiations.</li> <li>(c) The transmission charges for the use of the Cross Border Transmission Link developed under Clause (2-i) and (2-ii) of Regulation 7 of these regulations shall be recovered</li> </ul>	(a) ok (b) ok (c) may be deleted	Guidelines For Import / Export (Cross Border) of Electricity- 2018 provided Generating Station of India to connect with neighbouring country not vice-versa. Further, link wise transmission charges may not be recovered as utilization of links would be identifiable as

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				as detailed at Annexure-II to these regulations."		complete system between two countries would be considered as transmission capacity.
						Further if the link connected with the grid and is utilized by other entities the link will not remain a dedicated transmission link.
21.	24(1)	31	In line with the provisions of Regulation 6.5 of Scheduling and Despatch Procedure of Grid Code and Regulation 6 on Application of losses while scheduling of contracts of the Procedure for sharing of ISTS losses, the transmission losses shall be shared as per the following methodology: (a) Withdrawal PoC losses as applicable shall be applied at the interface.	In line with the provisions of Scheduling and Despatch Procedure of Grid Code and Regulation 10 of the Sharing Regulations the transmission losses shall be applied at the rate of Average all India ISTS losses for drawal schedules at Indian end of the Cross Border Transmission Link.	In line with the provisions of Scheduling and Despatch Procedure of Grid Code and Regulation 10 of the Sharing Regulations the transmission losses shall be applied at the rate of Average all India ISTS losses for drawal schedules	Drawal schedule may be always at Indian end of cross border link. Rather, delivery points are identified based on the mutual discussion.

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			(b) Injection PoC losses of respective injection grid shall be applied at the interface.		at delivery point (as decided at Government level).	
			(c) Net schedule at Indian end of the Cross Border Transmission Link shall be arrived at after applying injection PoC loss of the concerned injection zone and withdrawal PoC loss.			
22.	27		New Clause	Annexure-I and Annexure-II: (1) Annexure-I and Annexure-II shall be added at the end of the Principal Regulations as under:	Annexure-I: (1) Annexure-I shall be added at the end of the Principal Regulations as under: Annexure-I – ok Annexure-II – May be deleted	Annexure-II mention about transmission charges recovery of transmission link from generating station in neighbhouring country to Indian grid and Transmission link developed through merchant route. Implemetation of both type of links are not provided in the Guidelines- 2018.

## Comments on provisions of the Principle Regulations of CERC on cross-border trade, which are in deviation from the MoP guidelines and hence need to be amended

S.No.	Regulation No.	Principal Regulation	Suggested Modification	Remarks
1.	10(1)	(1) A Participating Entity located in neighbouring country and getting connected to the Indian grid through dedicated transmission systems for cross border trade of electricity within or across India shall be required to apply for Connectivity to the Indian grid.	May be deleted	As there no provision in the Guidelines-2018 for connecting generating station of neighbouring country in Indian Grid
2.	10(6)	(6) A Participating Entity located in the neighbouring country and getting connected to the Indian grid Cross Border Transmission Link shall not be required to apply for Connectivity to the Indian grid.	May be deleted	directly.
3.	14(2)	(2) The generating company located in the neighbouring country, implementing agency(ies) and the transmission licensee(s) shall endeavour to commission the generating station, Cross Border Transmission Link(s) and the transmission system within India respectively in matching time-frame as far as practicable.		