Comments on draft CERC 2024-29 tarrif regulation -Reg

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Tue, Feb 20, 2024 09:24 PM

- Subject : Comments on draft CERC 2024-29 tarrif regulation -Reg
 - **To :** Harpreet Singh Pruthi <secy@cercind.gov.in>, Puneet Arora <tariff-reg@cercind.gov.in>

Sir/Madam

As a electricity consumer I am presenting the following comments for consideration before finalization of the CERC tarrif regulation 2024-29:

1. Usefull life of OPGW kept at 15 years seems too low, as it has been seen that the OPGC wire has much more useful life.

2. Usefull life of civil buildings differs from CPWD norms.

3. At present for a consumer analysing the price of electricity it is like a black box. It is requested that in every order CERC may kindly analyze and state the cost implication every order will have on the price of electricity.

4. It appears O&M charges are calculated for each entity based on the last admitted O&M charges adjusted for inflation. However it is requested that the O&M charges may be fixed after analysing all the O&M charges of same sector like ISTS/ISGS irrespective of RTM mode/TBCB mode /Private sector/ Government sector etc.

5. Incentive given on Transmission Availability : here grouping of transmission lines, reactors, etc may be removed as the incentive may be given based on the avaiability of individual element as the present system is a drawback for small or new ISTS licencee.

6. The Auxilary consumption limits for ISTS substion is yet to be defined. Further the Auxilary consumption for ISGS may be standarized.

Thank You.

Regards,

Rajib Shillong Meghalaya Dated: 20-02-2024