

Power Foundation of India

(An autonomous Society under the Ministry of Power, Govt of India)

No. PFI/Prog/ LERC /2024/13

Dated: 25th September 2024

The Secretary

Central Electricity Regulatory Commission 7th Floor, Tower B, World Trade Centre, Nauroji Nagar, New Delhi- 110029

Subject: Comments on draft CERC (Appointment of Consultants) (Fifth Amendment) Regulations, 2024

Ref: CERC Public Notice No. L-7/1/0S44 (59)-CERC dtd. 27th August 2024

Dear Sir,

With reference to your above-mentioned Public Notice, Power Foundation of India (PFI) working as a society under the aegis of Ministry of Power (GoI), led by Director General Shri Sanjiv Nandan Sahai (Former Secretary in MoP (GoI)), has analysed the *Draft CERC* (Appointment of Consultants) (Fifth Amendment) Regulations, 2024.

- 2) PFI has been actively engaged in regulatory research and policy advocacy across Power Sector. The research studies encompass diverse aspects related to generation, transmission & distribution of power, electricity trading, energy transition, and environmental sustainability with a focus on delivering evidence–based research on issues and challenges pertaining to the Power Sector.
- 3) PFI has consistently collaborated with key stakeholders, including electricity regulatory commissions, utilities, and industry players, to provide well-researched inputs on issues impacting the power sector. For instance, PFI has provided inputs to MNRE, CERC and SERCs on their draft Regulations pertaining to Tariff, Deviation Settlement Mechanism, Renewable Energy, Power Markets, Open Access etc. We have noted from Statement of Reasons that in various cases SERCs have considered our comments / suggestions and have modified their draft regulations accordingly. PFI comments are available on our website at https://www.powerfoundation.org.in/comments-suggestions.php.
- 4) Apart from Regulatory research, PFI has prepared an Energy Dashboard and has completed study related to Financing India's 2030 Renewables Ambition with Bloomberg NEF. We also have MoUs with various organisations like Florence School of Regulation, Lawrence Berkeley National Laboratory (LBNL), DISCOMs, CEA, CPI, Prayas (Energy Group) etc. for undertaking specific studies. Such studies are in advanced stages.

- 5) With respect to the insertion of Regulation 6C in the draft amendment, which proposes the engagement of academic or research institutions/organizations for consultancy services for regulatory research, we would like to submit that the proposed provision may also include "Think Tanks and Societies under Govt. of India" as eligible entities to enhance the diversity and depth of expertise available to CERC, ensuring high-quality practical, and well-researched policy inputs.
- 6) In view of above, it is proposed that draft Regulations may kindly be modified accordingly.
- 7) The copy of this letter has also been emailed to secy@cercind.gov.in and asstsecy@cercind.gov.in.

Warm Regards,

Yours Sincerely,

(Praveen Kumar Singh) Senior Advisor, PFI