



CAPTIVE POWER PRODUCERS ASSOCIATION

(Registered U/sec. 25 of Company Act 1956 & Certificate of IT 12AA
CIN: U91990MH2003GAP141611)

Secretariat Office
Technocraft Industries (India) Ltd.
Technocrat House A-25 MIDC, Marol Andheri (East),
Mumbai 400093

Vikas Patangia
PRESIDENT

Contact: Nitin Ghorpade, Director
Email: nitinghorpade4243@gmail.com
Contact No. 9967013135

Date: 03rd May 2024

To,
Secretary
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi-110001
Email: secy@cercind.gov.in; shilpa@cercind.gov.in.

Subject: Suggestions –Draft CERC (Fees and Charges of Regional Load Despatch Centre and other related matters) Regulations, 2024.

Dear Sir,

In response to your public notice dated 4th April 2024 inviting suggestions and comments from the stakeholders on 'Draft CERC (Fees and Charges of Regional Load Despatch Centre and other related matters) Regulations, 2024', we would like to submit our comments as per the enclosed Annexure-I for your kind consideration.

Thanking you.

For CAPTIVE POWER PRODUCERS ASSOCIATION

Nitin S. Ghorpade
Director (CPPA)

Annexure-I:- Suggestions – Draft CERC (Fees and Charges of Regional Load Despatch Centre and other related matters) Regulations, 2024

Sr.No.	Para no.	Proposed draft	Comments on the draft / Suggestion
1.	<p>Para No. 25</p>	<p><i>Registration Fees: The fees shall be payable by the users, including power exchanges and electricity traders, before the commencement of grid access and scheduling. The fees payable are as under:</i></p> <p><i>(1) The distribution licensees, Bulk Consumers, and inter State transmission licensees shall pay non-refundable one-time registration fees of Rs.15 Lakh along with application for commencement of grid access: Provided</i></p> <p><i>(2) The generating companies shall pay registration fees as under:</i></p> <p><i>a) For generating station up to 10 MW installed capacity: Rs .0.75 Lakh;</i></p> <p><i>b) Generating stations having installed capacity of more than 10 MW and up to 100 MW: Rs. 1.5 Lakh;</i></p> <p><i>c) Generating stations having installed capacity of more than 100 MW and up to 500 MW: Rs. 7.5 Lakh;</i></p> <p><i>d) Generating stations having installed capacity of more than 500 MW and up to 1000 MW: Rs. 10 Lakh;</i></p> <p><i>e) Generating stations having capacity of more than 1000 MW: Rs.15.0 Lakh:</i></p>	<p>Suggestion: We request the Hon'ble commission to reduce the Registration fee applicable for bulk consumer to maximum up to Rs 5 Lakh.</p> <p>Rationale: The proposed regulation puts the distribution licensees, bulk consumers, and inter State transmission licensees in the same category and specifies the registration fees of Rs. 15 Lakh for all these entities.</p> <p>The Para 25(2) provides applicable registration fee for generating stations and the same is varying as per the installed capacity of the generating station.</p> <p>A bulk consumer can have a load as low as 50 MW and no limit for Maximum Load. Therefore, it is required that the registration fee for bulk consumer shall be based on its load. Further maximum registration fee for a bulk consumer may be capped at Rs. 5 Lakh.</p>

