

SUBMISSIONS ON BEHALF OF RISING SUN ENERGY (K) PRIVATE LIMITED AGAINST THE DRAFT (FEES AND CHARGES OF REGIONAL LOAD DESPATCH CENTRE AND OTHER RELATED MATTERS) REGULATIONS, 2024 ISSUED BY THE CENTRAL ELECTRICITY REGULATORY COMMISSION ON 04.04.2024

Respected Sir,

We, Rising Sun Energy (K) Private Limited hereby submit our comments on the draft new (Fees and Charges of Regional Load Despatch Centre and other related matters) regulations, 2024 issued by the Central Electricity Regulatory Commission.

1. Registration Fees (Regulation 25)

We humbly request the Hon'ble Commission to not increase the registration charges outlined in the draft regulations. Maintaining the current fee structure is essential to prevent imposing undue financial strain on stakeholders. Any significant hike in registration fees could potentially discourage participation and compliance, thereby undermining the objectives of the regulations. It is crucial to strike a balance between revenue generation and affordability to facilitate broader engagement and adherence to the regulatory framework.

2. Operationalizing the Payment Security Mechanism (PSM) and its consequences (Regulation 32)

We respectfully request that the requirement for a Payment Security Mechanism (PSM) through an unconditional, irrevocable letter of credit should not be implemented. The rationale behind this request is that the transactions involved are of a relatively small amount that would fluctuate on an annual basis. Imposing such a mechanism would result in unnecessary administrative burdens on the stakeholders without proportional benefits. We urge the Hon'ble Commission to explore alternative, less cumbersome methods for ensuring payment security that are better aligned with the nature and scale of these transactions.

3. Rebate (Clause 35)

We advocate for the continuation of the prevailing rebate clause without any changes. The current provision serves important objectives of incentivizing desired behaviours by providing commensurate relief during timely payments. Any alterations to this clause should be subject to careful assessment to ensure that they align with overarching policy goals and adequately address the interests of affected parties.

In conclusion, we appreciate the opportunity to provide suggestions on the draft regulations and urge Hon'ble CERC to consider the afore-mentioned points in the finalization process. We believe that incorporating these comments will contribute to the formulation of regulations that are effective, equitable and conducive to the growth and stability of the electricity sector.

Yours Sincerely

Rising Sun Energy (K) Private Limited
For RISING SUN ENERGY (K) PRIVATE LIMITED

Authorised Signatory


Authorised Signatory