



BSES Yamuna Power Limited

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Ref No: RNBYP/2024-25/211

Date: 25.11.2024

To,
The Secretary,
Central Electricity Regulatory Commission,
World Trade Centre, 6th, 7th and 8th Floor,
Tower-B, Nauroji Nagar,
New Delhi-110029

Sub: Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.

Ref: Hon'ble CERC's Public Notice No. L-1/250/2019/CERC dated 11.11.2024.

Sir,

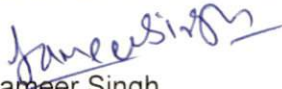
We write in reference to the aforesaid Public Notice, wherein comments have been sought from the stakeholders.

Accordingly, BYPL comments on the same are enclosed as Annexure-A for kind consideration of the Hon'ble Commission.

Thanking You,

Yours faithfully

For BSES Yamuna Power Limited


Sameer Singh
(Authorized Signatory)

Encl: As above

BYPL Comments on Draft Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.

Regulation No.	Clause	BYPL comments
<p>Regulation 4 (3)</p> <p>New sub-clauses (a-i) and (a-ii) shall be inserted after sub-clause (a) in Clause (2) of Regulation 13 of the Principal Regulations:</p>	<p>(a-i) Hydro PSP ESS, which has awarded the contract on or before 30.6.2025,</p> <p>shall be eligible for a waiver of transmission charges for a period of 25 years from the COD, subject to conditions as per sub-clause (c) of this Clause.</p>	<p>1. Current Scenario and Challenges:</p> <p>PSP projects currently in the early stages of development have faced delays due to extraordinary circumstances, such as prolonged clearance processes and other unavoidable challenges. Many of these projects could not enter into contract agreements within the stipulated timeline.</p> <p>To support such delayed projects and encourage their development, PSP Hydro projects should be eligible for a 100% waiver of transmission charges even after 30.06.2025, for a period of another 2years. This extension will provide much-needed relief and promote investments in such projects.</p> <p>2. Proposed Clause Amendment:</p> <p>"Hydro PSP ESS, which has awarded the contract on or before 30.06.2025, shall be eligible for waiver of transmission charges for a period of 25 years from the COD, subject to the conditions laid out in Clause (c) of this provision."</p> <ul style="list-style-type: none"> • Additionally, a special provision should be introduced to

		extend the eligibility for transmission charge waivers by two additional years for projects unable to finalize contracts due to unforeseen delays.
	(a-ii) REGS based on Offshore wind which has declared commercial operation on or before 31.12.2032 shall be eligible for a waiver of transmission charges for a period of 25 years, from the COD of said REGS.	ISTS waiver has been critical for expansion of renewable energy capacity as it reduces the cost of delivered power, translating into lower tariffs for the end consumer