



The Secretary
Central Electricity Regulatory Commission (CERC)
7th Floor, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029

Kind Attention – Mr. Harpreet Singh Pruthi

TSLDEL/ 100 /2025
26th November 2024

Subject: Comments on the 'Draft Central Electricity Regulatory Commission (Sharing of interstate Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.'

Dear Sir,

We are writing in reference to the comments invited by The Honourable CERC regarding the **Draft Central Electricity Regulatory Commission (Sharing of inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.**

As directed, we're submitting the comments and suggestions on the proposed modifications after an extensive consultation with our members. (Annexure Attached)

Thank you for your kind attention to this matter. We are sure that these feedback from our members would be invaluable in refining these regulations and ensuring they meet the sector's evolving needs.

Thanking you,

Yours faithfully,

(Manish Mishra)
Chief Corporate Affairs

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Annexure :

<p>Provision/Clause No.</p> <p>(7) A new sub-clause (h) shall be inserted after subclause (g) under Clause (2) of Regulation 13 of the Principal Regulations as under: “(h) Any REGS based on wind or solar source which is eligible for a waiver of inter-state transmission charges under Regulation 13(2) of these regulations and is having its scheduled date of commissioning on or before 30th June 2025 is granted extension of time to achieve COD by the competent authority in terms of the Power Purchase Agreements (where PPA has been entered into with, a Renewable Energy Implementing Agency or a distribution licensee or an authorized agency on behalf of distribution licensee, consequent to tariff based competitive bidding) or the Commission (for cases other than specified PPA, on an appropriate application made by the entity), on account of any Force Majeure, event including non-availability of transmission or for reasons not attributable to the REGS, and the project achieves COD before the extended date, it shall be eligible for a waiver of inter-state transmission charges as if the said REGS had achieved COD on 30.6.2025:</p> <p>Provided that, for the purpose of this Clause, such extension shall not exceed a period of six months at a time and not more than two times.”</p>	<p>Comments:</p> <ol style="list-style-type: none"> 1. The definition of eligible REGS for wavier of ISTS charges is not very clearly provided in the regulations. If we refer to the MoP notification dated 09.06.2023, 21.11.2021 & 30.11.2021, projects that get commissioned before 30.06.2025 are eligible for ISTS charges wavier. 2. The term “Competent Authority” and ‘commission’ is not defined clearly and may be defined appropriately to include REIAs/ Discoms providing extension in SCOD in accordance to the PPA provisions. 3. Clarification on Definition/method of “Appropriate Application” which an entity will be making to ‘commission’ or ‘Competent Authority’ for extension. 4. Clarification on subsequent steps by ‘commission’ or ‘Competent Authority’ if the COD exceeds the granted extension date as well. <p>Remarks: - We also suggest that the proviso regarding two extensions of 6 months on account of FM, Delay in Transmission & Delay in government approval is restrictive, delays can be more than 1 year and should be granted.</p>
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