



MP POWER MANAGEMENT COMPANY LIMITED

C.I.N.: U40109MP2006SGC018637

(MP GOVT. UNDERTAKING)

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s/f

No. CGM(Regulatory)/CERC/ 436

Jabalpur, Dated 15-10-18

To,

The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor, Chanderalok Building,
36, Janpath,
NEW DELHI – 110001

Sub: Draft Central Electricity Regulatory Commission (Open Access In Inter State Transmission) (5th Amendment) Regulations, 2018.

Ref: Your Public Notice No.PM/NOAR/2016/CERC dtd.8-8-2018

Dear Sir,

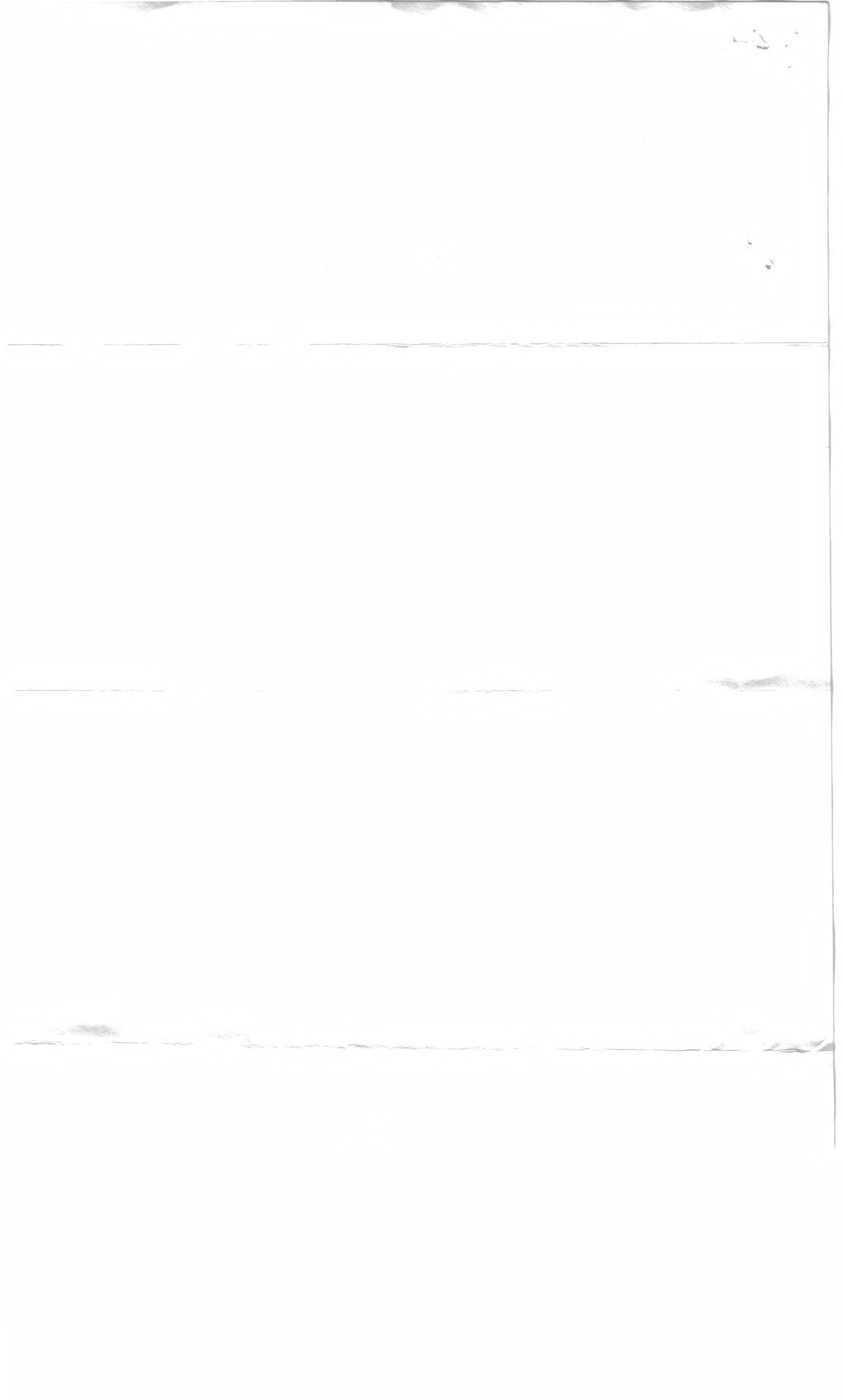
Comments/Objections/Suggestions were invited in the subject captioned above vide letter under reference.

Please find enclosed herewith the suggestions of MPPMCL Jabalpur for kind consideration while finalizing the regulations please.

Encl: As above.

Chief General Manager (Regulatory)
MPPMCL: Jabalpur

Chief General Manager (Regulatory),MPPMCL Block No.11, Shakti Bhawan, Rampur, Jabalpur-482008 (MP)
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Comments/Suggestions/Objections of MPPMCL on Draft CERC(Open Access in Inter-State Transmission) (Fifth Amendment) Regulations, 2018

SNo	Regulation no. of Principal Regulations	Existing provision	Proposed provision in draft	Comments
1..	8- Concurrence of SLDC for bilateral and collective transactions (To be substituted as proposed)		8(1) An Online..... procedures. Provided that while making application a declaration in the format prescribed in the detailed procedure shall be submitted along with the application declaring that there is no other contract for sale or purchase, as the case may be, of the same power for which standing clearance has been applied for.	The proposal at 8(1) and 8(6) are not in consonance. If proposal at 8(6) is implemented, the whole exercise done in respect of 8(1) will turn futile.
			8(6) The open access customer to whom the standing clearance has been issued or deemed to have been issued, may schedule transactions under any of the categories of short term bilateral or collective transactions in OTC market and/or Power Exchange(s)market provided that the total trade under all types of short-term inter-state transactions does not exceed the quantum of standing clearance issued by the concerned SLDC/RLDC	



2.	New Regulation 18A		All charges payable under these regulations shall be paid online through the payment gateway made available in the NOAR.	Following proviso may be added-“ Provided that, these charges shall be shared by NLDCs per procedure to be framed by NLDC under Regulation 4 of Draft Regulation”
3.	New proviso to Regulation 25A		Provided that if the default in payment exceeds 90 days from the due date of payment of the charges as mentioned above, the NLDC or RLDC, as the case may be, may deny short term open access to the defaulting entity without approaching the Commission for specific directions in this regard.	Following proviso may be added- “Provided further, that in case of non-payment of cross subsidy surcharge and additional surcharge within 15 (fifteen) days from due date of payment, the NLDC or RLDC or SLDC as the case may be, may revoke the open access permission and deny short term open access to the defaulting entity till the default is cured by the entity.


CGM(Regulatory)
MPPMCL, Jabalpur

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