

Tata Power DDL/PMG/CERC/09082019

Dated 9th Aug' 2019

Mr. Sanoj Kumar Jha (Secretary)
Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi- 110001,

Subject: Draft Central Electricity Regulatory Commission (Procedure, Terms and Conditions for grant of trading license and other related matters) Regulations, 2019.

Reference- CERC notification no ECO-14/06/2019-CERC dated 24th July' 2019.

Dear Sir,

This has reference to the draft CERC notification no ECO-14/06/2019-CERC dated 24th July' 2019 on subject above. Our comments on the same are as mentioned below:-

Regulation Number (9), Provision (24):-

Tata Power DDL comments:

1. We submit that Traders should be allowed to engage in banking transactions by fixing a nominal Trading Margin.
2. The same is proposed on the premise that any utility interested in entering into a banking transaction with any other utility may have a limited access to the information regarding the shortage/surplus scenario of other utilities whereas traders generally has access to all this information by way of being in constant touch with various utilities.
3. Any short term transaction involves numerous activities like co-ordination with other Utilities/RLDC's/SLDC and bid submission/making open access applications/billing/energy reconciliation etc. Involvement of traders in banking transactions will enable utilities in timely finalization and completion of banking transactions by way of outsourcing these essential activities to the traders which otherwise require considerable time and manpower.

4. Submission of EMD/CPG which form a part of bid submission is done by the Traders on behalf of utilities. Accordingly we propose a nominal trading margin for the same.

Thanking You.

Yours Sincerely,

For Tata Power Delhi Distribution Ltd.


Sumit Sachdev

HoD (Power Management Group)