

● PRAYAS

Initiatives in Health, Energy,
Learning and Parenthood



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Your Reference: Public notice (2nd Dec 2003)

To,
Secretary,
CERC.

Subject: Comments on CERC (Terms and Conditions for Open Access)
Regulations

Sir,

We have following comments on CERC draft regulations for Terms and
Conditions for Open Access

1. The un-utilized transmission capacity or the allocation of capacity is likely to be a dynamic process and it may require good co-ordination between RLDCs and the CTU. One of these agencies would need to be given mandate of achieving the co-ordination.
2. Section 10 (iii), at least some token processing fees should be payable by an applicant for short-term open access.
3. If the long-term open access customer is temporarily unable to utilize the capacity, he should have option of temporarily surrendering the capacity and in addition to that the RLDC should have authority to temporarily re-allocate such un-utilized capacity.
4. Section 21 and 22: It is not clear (to us) if use of wording "state utilities" is sufficiently clear (in law)
5. Section 24: It is not clear who will decided the necessity of installing the special energy meters by embedded customers.
6. Section 31, Monthly reports: (1) it may be essential to evolve a system of "Unique contract ID" for all open access contracts, (2) a column specifying the "Average daily maximum capacity utilization" (in MW) may help get better picture of the transactions, (3) these monthly reports should be available on the CERC web site in a format that allows analysis.

I request CERC to consider our comments.

Regards

(Girish Sant)
for Prayas Energy Group