Sr. No.	Proposed in Draft Guidelines	Comments	Suggestions and suggested Amendment	Maha STU's Views
A. Scope of the Guidelines				
1.	**Clause 2.4** *2.4. The Ministry of Power, through its letter dated August 6, 2021, issued revised Standard Bid Documents (SBDs), which include the Request for Proposal (RFP) for the selection of a Transmission Service Provider (TSP) via the TBCB process to establish ISTS projects, as well as the Transmission Service Agreement (TSA) for the development and operation of ISTS systems for electricity transmission through the TBCB route. These SBDs shall be adopted for the development of Intra-State Transmission projects under the TBCB process within the State of Maharashtra, with appropriate modifications to the SBDs, following approval from the State Government and MERC, for awarding Intra-State transmission projects.*	❖ **Sterlite** submitted that this clause proposes to adopt the SBD issued by MoP on 06-08-2021 for the development of Intra State transmission projects under the TBCB process with appropriate modifications following approvals from State Govt and MERC.	❖ It is submitted that the best practices (that enhance transparency and optimization of tariff) under Aug-21 SBD of MoP be retained. ❖ For eg. the SBD of MoP provides a Payment Security Mechanism through revolving LCs and LPS 2022 rules effectuated through a nodal agency (the CTU) empowered to control power flow to LTTCs. Similar mechanism may be adopted in the State. ❖ The State can make STU as the nodal agency for TBCB contracts, provide for revolving LC, LPS rules 2022 and escrow over the revenue of LTTCs along with empowering the STU to control power flow.	❖ The stakeholder's suggestion primarily pertains to the Standard Bid Documents (SBDs). ❖ Clause 2.4 of the draft guidelines clearly mention that the SBDs shall be adopted for the development of Intra-State Transmission projects under the TBCB process within the State of Maharashtra, with appropriate modifications to the SBDs, following approval from the State Government and MERC, for awarding Intra-State transmission projects. ❖ **In view of the above, no changes are required in the proposed Clause of the draft guidelines.**
2.	**Clause 2.5** *2.5. The contract period for the Intra-State transmission projects shall be 35 years or as per the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2024.*	❖ **Sterlite** submitted that the contract period is not clear.	❖ The contract period should be fixed and sacrosanct as per the SBD as 35 years. It should not change based on changing regulations. ❖ **Suzlon Energy** submitted that as per the Central Electricity Authority (CEA) Technical Standards for the Construction of Electrical Plants and	❖ These guidelines have been prepared in accordance with MoP "Guidelines for Encouraging competition in Development of Transmission Project", "TBCB-Guidelines for Transmission Services" and Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2024. ❖ In the above-mentioned, MoP Guidelines, the contract period

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			Transmission Lines, Clause 84(2) and 43(3): ▪ Clause 43(3): The substation shall be designed and constructed to have a life of not less than 35 years. ▪ Clause 84(2): The transmission line shall be designed and constructed to have a life of not less than 35 years. ❖ Based on the above-mentioned CEA clauses, MSETCL needs to consider a service life of up to 35 years and remove any reference to the 'MERC (Multi Year Tariff) Regulations 2024.	for transmission projects is mentioned as 35 years whereas as per MERC MYT Regulations the useful life for Transmission lines is mentioned as 35 years. ❖ In both, the development of transmission projects through Tariff Based Competitive Bidding will have service life of 35 years. ❖ **In view of the above, no changes are required in the proposed Clause of the guidelines.**
3.	**Clause 2.6** *2.6. Providing transmission services would include all activities related to survey, detailed project report formulation, arranging finance, project management, obtaining transmission license, obtaining right of way, forest clearance, environment clearance, statutory and other necessary clearances, site identification, land acquisition and payment of compensation, design, engineering, quality control, procurement of equipment, material, construction, erection, testing and commissioning, maintenance and operation of transmission lines and/or substations*	❖ **Sterlite** submitted as follows: - 1. what stage the DPR is expected to be formulated? 2. Will the MSETCL provide the initial survey reports as scope includes the survey activity? 3. Maintenance and operations of Transmission lines…. and/ or HVDC links	❖ The DPR formulation is required to be removed from the scope of Transmission service. It is understood that the DPR of the schemes will be prepared by the STU before notifying the schemes in their MYT petitions. ❖ The initial survey report from MSETCL is crucial for ensuring alignment with the route and cost optimization. ❖ We understand this would include all types of transmission systems including overhead as	❖ DPR shall be prepared by the respective transmission licensees for estimation of transmission project cost for ascertaining whether the cost of the project is below or equal or above the threshold limit for execution of project under TBCB. ❖ No, the initial survey report shall be provided by the Bid Process Coordinator (BPC) for the projects to be developed through TBCB.

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	and/or switching stations and/or HVDC links including terminal stations and HVDC transmission line. It will be in such a manner that the required transmission services as specified in the bid document are provided from execution of the project up to completion and commissioning and its subsequent maintenance and operation so that the facilities are available as per the target for recovery of full transmission charges as quoted by the selected bidder during the e-reverse bidding and adopted by the MERC.		well as underground lines and off shore systems also. The same may be included in text.	❖ Yes, the same will be part of the transmission scheme/project. However, it is unnecessary to explicitly mention all types of transmission systems within the scope of the guidelines clause. ❖ Clause 2.6 of the guidelines is aligned with the Clause 2.4 of the MoP "TBCB-Guidelines for Transmission Services". ❖ **In view of the above, no changes are required in the proposed Clause of draft guidelines.**
4.		❖ **Suzlon Energy** submitted RE potential zones were not considered during the finalization of TBCB schemes for transmission projects.	❖ New Clause 2.7: Identification and Inclusion of Renewable Energy (RE) Potential Zones in the State Transmission Utility Rolling Plan ❖ This clause emphasizes the importance of identifying regions within the state that have high potential for renewable energy (RE) development.	❖ The draft guidelines are designed to be inclusive and apply uniformly to all types of Transmission Projects ❖ **In light of the above, the stakeholder's proposal for explicit bifurcation may not be considered, as the current guidelines adequately address all project types.**
B. Threshold limit and Other Conditions for TBCB Intra-State Transmission Projects as per MERC MYT Regulations, 2024				
5.	**Clause 3.3 (2)** ……. *2) This Threshold Limit shall be applicable for all new Intra-State Transmission Systems Projects and Projects where MERC's earlier*	❖ **Sterlite** submitted that the Threshold limit should be applicable for all new as well as augmentation projects for considering under TBCB route execution.	❖ Some of States have adopted the threshold limit for new as well as augmentation projects (Such as Tamila Nadu, Gujarat, Haryana, Uttarakhand).	❖ The applicability of threshold limit has been proposed in the draft guidelines as per Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2024

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	approval is not valid or cancelled by the MERC, as the case may be.		❖ So, the threshold limit for augmentation projects may also be considered. This will help to get competitive tariffs as well as advantage wherever the augmentation works are upstream/downstream for new projects.	and is not within the purview of these Guidelines. ❖ **Hence, no changes are required in the proposed Clause of the guidelines.**
6.	**Clause 3.3 (4)** ……. *4) In case the STU intends to implement any Intra-State Transmission System above the Threshold Limit through cost-plus approach under Section 62 of the Act, due to some specific reasons such as project is of critical nature (e.g., Transmission System being developed for Defence, Railways, Airport, etc.) or the Project that may lead to ownership or interface issues, i.e., the ownership of new Intra-State Transmission System cannot be delineated from the assets of existing transmission assets, the STU shall obtain prior approval of the MERC for the same. Further, in case the STU intends to implement any Intra-State Transmission System below the Threshold Limit through Tariff Based Competitive Bidding, due to some specific reasons, STU may decide to implement such projects through Tariff Based Competitive Bidding with valid reasons to do so and with prior approval of the MERC.*	❖ **Sterlite** submitted that; it must be clarified under what conditions a transmission project planned for Railways/ Airports will be considered critical? ❖ Further, Delineation of New Intra State assets from the existing transmission assets	❖ It is understood that in many cases a new line will require to be terminated into an existing substation along with construction of bays and addition of transformers. This will require sharing of O&M expenses. ❖ These assets shall be considered to be delineated with each other. ❖ The STU will ensure transmission planning to maximise the no of projects under TBCB mode.	❖ The other conditions for TBCB for Intra-State Transmission System has been proposed in the draft guidelines as per Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2024. ❖ **Hence, no changes are required in the proposed Clause of the draft guidelines.**

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C. Selection of Projects to be implemented under TBCB				
7.	**Clause 4.1** *4.1. All new Intra-State Transmission Systems excluding the schemes involving the upgradation / augmentation of Assets forming part of the existing Transmission Licensee and excluding the schemes, which appears in the Licence of the Transmission Licensee, costing Rupees Two Hundred (200) Crore or more excluding land cost and RI Charges shall be implemented by STU through Tariff Based Competitive Bidding in accordance with the competitive bidding guidelines notified by the Central Government from time to time. In order to assess as to whether the scheme is upgradation/augmentation of assets forming part of the existing Transmission Licensee, following criteria shall be applied:* ***Upgradation of Assets :*** *The term upgradation of assets means modifying or replacing existing transmission system components to improve their performance, efficiency, or reliability without necessarily increasing capacity.* ***The examples of upgradation of assets that will be considered under the above provision are:***	❖ **AEML-T** submitted that 'Upgradation' of assets can not be limited to only to few examples. The other schemes that could be included under "upgradation" are: ▪ conversion of OH to UG & vice-a-versa to improve their performance, efficiency, or reliability without necessarily increasing capacity, ▪ Twin Conductors, ▪ Upgradation to counter technological obsolescence, ▪ Multiple voltage levels, ▪ AIS to GIS conversion, etc. In view of the above, the proposed addition is suggested so that inclusion of a proposed scheme under "upgradation of assets" could be decided on a case to case basis.	"4.1…….....**Upgradation of Assets;** The term upgradation of assets means modifying or replacing existing transmission system components to improve their performance, efficiency, or reliability without necessarily increasing capacity. **The type of schemes under upgradation of assets could be including, but not limited to:** ~~The examples of upgradation of assets that will be considered under the above provision are :~~ • Replacing old conductors with high-capacity conductors (e.g., HTLS conductors). • Upgrading control and protection systems to digital or smart grid technologies. • Increasing voltage levels on existing transmission lines (e.g., from 132 kV to 220 kV)……."	Considering the suggestions of Stakeholders, Clause 4.1 of the Guidelines is modified as follows: **All new Intra-State Transmission Systems excluding the schemes involving the upgradation / augmentation of Assets forming part of the existing Transmission Licensee and excluding the schemes, which appears in the Licence of the Transmission Licensee, costing Rupees Two Hundred (200) Crore or more excluding land cost and RI Charges shall be implemented by STU through Tariff Based Competitive Bidding in accordance with the competitive bidding guidelines notified by the Central Government from time to time. In order to assess as to whether the scheme is upgradation/augmentation of assets forming part of the existing Transmission Licensee, following criteria shall be applied:** Upgradation of Assets : The term upgradation of assets means modifying or replacing existing transmission system

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	• *Replacing old conductors with high-capacity conductors (e.g., HTLS conductors).* • *Upgrading control and protection systems to digital or smart grid technologies.* • *Increasing voltage levels on existing transmission lines (e.g., from 132 kV to 220 kV).* ***Augmentation of Assets :*** *The term augmentation of assets means adding new components to an existing transmission system to increase its capacity.* ***<u>The examples of augmentation of assets that will be considered under the above provision are:</u>*** • *Installation of additional transformers or reactive power compensators.* • *Extension of existing substations or lines.*	❖ Cases where construction of a new substation is proposed	"4.1…….....**Augmentation of Assets**; The term augmentation of assets means adding new components to an existing transmission system to increase its capacity. **The type of schemes under upgradation of assets could be including, but not limited to:** ~~The examples of augmentation of assets that will be considered under the above provision are:~~	components to improve their performance, efficiency, or reliability without necessarily increasing capacity. The type of schemes under upgradation for assets could be including, but not limited to : • *Replacing old conductors with high-capacity conductors (e.g., HTLS conductors).* • *Upgrading control and protection systems to digital or smart grid technologies.* • *Increasing voltage levels on existing transmission lines (e.g., from 132 kV to 220 kV).* • *Conversion of OH to UG & vice-a-versa to improve their performance, efficiency, or reliability without necessarily increasing capacity,* • *Conversion from Single to Twin Conductors,* • *Upgradation to counter technological obsolescence,* • *Creation of Multiple voltage levels,* • *AIS to GIS conversion.*

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	<u>It is clarified that the construction of new sub-stations within the premises of existing sub-station or construction of new transmission lines will be considered as New Projects to taken up under TBCB.</u>	within the premises of existing substation squarely fall under "ownership issues". These situations can give rise to potential safety and operational coordination issues between licensees. Further, there will be un-necessary complexity of determination of suitable compensation for the use of land of one licensee by another, which will require regulatory approval as well. These are the type of complexities, avoidance of which is envisaged by the Hon'ble Commission, through exclusion of cases of ownership issue from TBCB. Hence, such cases where construction of new substation is proposed within premises of existing substation may only be allowed to the Licensee who owns such premises i.e. through RTM and not through TBCB. ❖ **MSETCL-T** submitted that as the existing substation assets are in the books of respective licensees, any upgradation of level in the existing substation premises if taken under TBCB	• Installation of additional transformers or reactive power compensators. • Extension of existing substations or lines. ....." "4.1…..... It is clarified that the ~~construction of new sub-stations within the premises of existing sub-station or~~ construction of new transmission lines will be considered as New Projects to **be** taken up under TBCB,....." ❖ **MSETCL-T** suggested additional Clause is as follows: **"Construction of new substations within the premises of existing substations for construction of**	<u>Augmentation of Assets</u> : The term augmentation of assets means adding new components to an existing transmission system to increase its capacity. The type of schemes under augmentation for assets could be including, but not limited to: • *Installation of additional transformers or reactive power compensators.* • *Extension of existing substations or lines.* It is clarified that the construction of new sub-stations within the vicinity of existing sub-station or construction of new transmission lines will be considered as New Projects to taken up under TBCB. However, the schemes related to construction of new sub-stations within the premises of existing sub-stations or construction of new transmission lines for level creation in existing sub-stations shall be

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		will create conflict of interest. Hence, such projects shall invariably be taken under RTM. ❖ TPC-T Submitted that Under Augmentation of Assets, STU has clarified that the construction of new sub-stations within the premises of existing sub-station or construction of new transmission lines will be considered as New Projects to taken up under TBCB. .However, existing Land of the licensee within premises of a substation under the ownership of the Licensee can not be delineated from existing Transmission assets. In view of the above, guideline given by the STU is in contravention to the MERC Regulations and needs to be brought in line with the regulations.	**new transmission lines for level creation in existing substations shall not be considered under TBCB."** ❖ **TPC-T suggested that** specific clarification about construction of new sub-stations within the premises of existing sub-station or construction of new transmission lines mentioned in clause 4.1 should be removed and the guideline mentioned in clause 4.5 is adequate to address this issue as per the MYT Regulations, 2024	considered as augmentation schemes.
8.	**Clause 4.3**	❖ **AEML-T** submitted that MSETCL SOR will be followed	"……..4.3 The Tentative Base Cost of the Project **only for deciding**	Considering the suggestions of Stakeholders, Clause 4.1 of the Guidelines is modified as follows:

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	4.3 The most important aspect for project to be considered under TBCB is Project Cost excluding Land Cost and Reinstatement Charges. Typically, the Land Cost and Reinstatement Charges vary across the State and depends upon location of the Project. However, there will not be substantial difference in equipment cost of the Project across the State. Hence, in order to assess as to whether the Cost of the Project excluding Land Cost and RI Charges is exceeding Rs 200 Crore or not, tentative cost of the transmission project needs to be estimated. ***The Base Tentative Base Cost of the Project shall be estimated by considering the latest Schedule of Rates of MSETCL as submitted to MERC for arriving at the base cost of various equipment, material and civil works. In case certain items are not available in SOR, the costs of such items shall be considered based on latest Purchase Orders placed for similar items duly escalating upto the current price level.*** *Once the Base Cost of the Project is estimated based on this approach, following costs involved in the Project shall be computed as follows and added to the Base Cost:* • *Centages of 7% as per MERC Capex Regulations* • *Crop Compensation as per GOM circular*	by all Licensees to define project cost to determine TBCB vs RTM. However, as per MEGC 2019, during DPR submission under RTM, Licensees will follow their respective SoR. Further, the landing price of equipment may vary, considering freight, Customs Duty Charges, etc. Also, Civil Charges may vary across the State considering material, constructions work, services, etc. Hence, DPR cost may vary during execution of the scheme under RTM by Licensees (other than MSETCL). In view of the above, appropriate clarification may to be included in the guidelines. ❖ TPC-T submitted suggested that the estimated cost of the scheme for each Licensee based on its own SOR may be different from MSETCL SOR on various aspects. Since, STU has proposed to use the SOR of the MSETCL to work out	**whether the project falls under TBCB or not** shall be estimated by considering the latest Schedule of Rates **(SOR)** of MSETCL as submitted to MERC for arriving at the base cost of various equipment, material and civil works. **STU shall publish the latest Schedule of Rates of MSETCL as submitted to MERC on its website.** In case certain items are not available in SOR, the costs of such items shall be considered based on latest Purchase Orders placed for similar items duly escalating up to the current price level....." ❖ A provision may please be included to this effect where the Licnesse should not be bound to the cost computation as per MSETCL SOR.	*"……The Base Tentative Base Cost of the Project only for deciding whether the project falls under TBCB or not shall be estimated by considering the latest Schedule of Rates of MSETCL as submitted to MERC for arriving at the base cost of various equipment, material and civil works……"* ❖ It is mentioned in revised guideline that the Base Tentative Base Cost of the Project only for deciding whether the project falls under TBCB or not shall be estimated by considering the latest Schedule of Rates of MSETCL

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	• *Spares as per MERC MYT Regulations, 2024* • *Contingencies of 3% to take care of quantity variations and 5 % for Price Variations* • *Interest During Construction considering the normative debt:equity ratio of 70:30, phasing of expenditure considering the project schedule and interest rates as approved by the Commission in its latest MYT/MTR Order.* *After adding all the above components to the Base Cost, the total Project Cost excluding land and RI charges shall be worked out.*	the base cost for bringing uniformity for the purpose of comparison, it is important to note that in actual the project will be executed by the licensee following its own SOR/procurement practices which may lead to different final cost of the project as compared to cost worked out by STU using MSETCL SOR . In such situation, Licnesse shall be allowed the actual cost. ❖ **Sterlite** submitted that; Is the price variation at 5% per annum?	❖ Sterlite suggested that an alternate mechanism reflective of the actual price variations be used. Such price variations be based on IEEMA based indices for transformers, switch gears, transmission towers (steel) and conductors and a 5% general inflation per year on other items.	❖ The price variation is applicable on the total project cost and not on per annum basis.
9.	**Clause 4.5** *4.5.Even if the total Project Cost excluding Land Cost and RI Charges is equal is equal to or more than threshold limit of Rs 200 Crore specified in the Regulations, STU in following cases may approach MERC for prior approval to implement the project under RTM.* • *Project is of critical nature (e.g., Transmission System being*	❖ **AEML-T** submitted that Transmission infrastructure associated with National / Public / Financial Infrastructure can also be critical in view of National security /economy/ public safety. ❖ Further, Critical projects should also include large Data Centers, Central Business Districts	"4.5. Even if the total Project Cost excluding Land Cost and RI Charges is equal is equal to or more than threshold limit of Rs 200 Crore specified in the Regulations, STU in following cases may approach MERC for prior approval to implement the project under RTM. • Project is of critical nature (e.g., Transmission System being	

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	developed for Defence, Railways, Airport, etc.). • *Project may lead to ownership or interface issues, i.e., the ownership of new Intra-State Transmission System cannot be delineated from the assets of existing transmission assets.*	(CBDs) / Financial Hubs / large redevelopments, etc. ❖ Moreover, the following type of schemes may lead to ownership/interface issues. • Scheme with Substation or OH Transmission lines or UG Cable system utilising common space/Land or common RoW or common tower/cable trench, • Schemes have multiple components like Source end, Load end, connectivity's in between lines, etc. In view of the above, decision is required on case-to-case basis and cannot be limited to examples.	developed for Defence, Railways, Airport etc.). • Project may lead to ownership or interface issues, i.e., the ownership of new Intra-State Transmission System cannot be delineated from the assets of existing transmission assets. **On receipt of the scheme proposal from the Licensee, STU shall review the scheme on cases to case basis on its criticalness and check if any ownership or interface issues may arise in consultation with relevant stakeholders.**	❖ **As the detailed guidelines have been framed for selection of Projects to be executed through TBCB, consultation with relevant stakeholder for each scheme is not required.**
		❖ **MSETCL-T** submitted that by specifying the broader types of critical projects in the policy, it will help expedite the recommendation process for the mode of implementation. ❖ Further, submitted that the Government of Maharashtra is consistently taking initiatives to	❖ Project is of critical nature (e.g., Transmission System being developed for Defence, Railways, Metros, Airport, **Port, Industrial Parks/cities, SEZ**, etc.) ❖ **MSETCL-T** suggested addition in Clause is as follows:	Considering the suggestions of Stakeholders, following amendment is made to guidelines. "….Project is of critical nature (e.g., Transmission System being developed for Defence, Railways, Airport, Port etc. or any other Project as decided by

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		boost FDI and implement ambitious industrial policies such as Green Hydrogen, Giga Factories, Manufacturing Hubs, and Refinery Projects. To facilitate ease of doing business, it is crucial to develop power infrastructure at an accelerated pace, which should be carried out under the RTM mode.	**"Projects is of State Importance as declared by Govt of Maharashtra under various policies."**	the Empowered Committee).""""
D.	**Figure 1: Step wise checklist for selection of projects to be implemented under TBCB & Table 1: Summary of Criteria for Selection of Project to be implemented under TBCB**			
10.	**Figure 1: Step wise checklist for selection of projects to be implemented under TBCB**		❖ **AEML-T** suggested modification is as follows: - 1. Modifications in Existing flow chart as follows; ".....2. STU 10 Year Rolling Plan Schemes should be divided into 02 parts as followed; **a. Assigned to Licensee - RTM** **b. Yet to be assigned to Licensee - RTM/ TBCB** **3. Schemes falling under "a. Assigned to Licensee" to be routed through RTM.** **4. Schemes falling under "b. Yet to be assigned to Licensee" to be divided as followed** **4.1 Schemes > Rs.200 Cr.** **- Critical Schemes – RTM** **-Upgradation or Augmentation at existing Assets - RTM**	❖ The proposed checklist for selection of projects of projects to be implemented under TBCB is align with the Threshold limit and Other Conditions for TBCB Intra-State Transmission Projects as per MERC MYT Regulations, 2024. ❖ Hence, no changes are required in the proposed draft guidelines.

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			- Project listed in License - RTM **- project leading ownership or interface issues – RTM** **- New Scheme - TBCB** 4.2 Schemes < Rs. 200 Cr. RTM....."	
		❖ **Sterlite** submitted that Upgradation /augmentation Projects/Schemes appearing in the Licence of the Transmission Licensee to be executed through TBCB route.	❖ In case of Upgradation /augmentation Projects /Schemes are upstream /downstream for any new projects, then entire works need to be considered as a single scheme and to be considered under TBCB.	❖ Yes, the stakeholder understanding is correct. However, no changes are required in the proposed draft guidelines.
11.	**Table 1: Summary of Criteria for Selection of Project to be implemented under TBCB** **……** ***"4. TBCB Exclusions*** ❖ *Upgradation or augmentation of existing assets held by the Transmission Licensee.* ❖ *Projects listed in the Transmission Licensee's licence.* ❖ *Project of critical nature (e.g., Transmission System being developed for Defence, Railways, Airport, etc.) subject to MERC approval.*	❖ TPC-T suggested to include the following in exclusions. "In MMR & Urban areas where it is necessary to connect source lines through EHV cables for proposed stations due to RoW difficulties, for such projects, terminating line cost to be considered in exclusion similar to RI charges & Land cost. (e.g. As per TPCT's FY-25 SOR, the per meter cost of 220 kV, 1C, 1600 sq mm cable (Cu/Pb) is Rs/- 28928 & the per meter cost of 0.5 SqIn ACSR moose Conductor is Rs/- 492. From this comparison it is visible that the	▪ Upgradation or augmentation **at** ~~of~~ existing assets held by the Transmission Licensee. ▪ Projects listed in the Transmission Licensee's licence. ▪ Project of critical nature ~~(e.g., Transmission System being developed for Defence, Railways, Airport, etc.)~~ subject to MERC approval.	Considering the suggestions of Stakeholders, following amendment is made to guidelines. "….Project is of critical nature (e.g., Transmission System being developed for Defence, Railways, Airport, Port etc. or any other Project as decided by the Empowered Committee).""""" As there is no provision of excluding terminal line cost in the MERC MYT Regulations, the same cannot be included in the exlusion.

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	❖ *Project Leading to ownership or interface issues, i.e., the ownership of new Intra-State Transmission System cannot be delineated from the assets of existing transmission assets subject to MERCs approval. ……"*	cost of EHV cable per meter is @ 59% higher than overhead conductor cost)"	▪ Project Leading to ownership or interface issues, ~~i.e., the ownership of new Intra- State Transmission System cannot be delineated from the assets~~ of existing transmission assets subject to MERCs approval.	
12.	**Table 1: Summary of Criteria for Selection of Project to be implemented under TBCB**	❖ TPC-T submitted that the definition of "Existing Projects" is not provided in the guidelines document which is important for getting clarity in the flow chart provided. Same needs to be provided	TPC_T suggested to include "Exclusion" provided by TPC-T in Table-1	In MYT Regulation, 2024 "*Annexure-IV: Threshold Limit for Intra-State Transmission System to be developed through Tariff Based Competitive Bidding*" "existing Transmission Licensee" and "assets of existing transmission assets" is covered. As these guidelines have been prepared in accordance with MERC MYT Regulations, 2024. Therefore, the definition of the ***"existing projects"*** in the guidelines shall be governed by the provisions of MERC (Multi Year Tariff) Regulations, 2024.
E. Additional Comments				
13.	**Additional Comment submitted by Sterlite**	❖ Who will be the Bid Process Coordinator & their scope?	❖ It is suggested that the BPC is appointed as soon as the scheme is approved by the MERC under TBCB route.	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines. BPC shall be appointed by the Committee.

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14.	**Additional Comment submitted by Sterlite**	❖ Clarity on Share Purchase Agreement (in case no BPC is not being appointed)	❖ As per MoP SBD, the SPA is between BPC, SPV and Successful bidder.	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines.
15.	**Additional Comment submitted by Sterlite**	❖ Guidelines do not bring clarity on the payment security mechanism	❖ As per the SBD, the transmission charges shall be payable through the CTU as per CERC sharing Regulations.	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines.
16.	**Additional Comment submitted by Sterlite**	❖ All statutory approvals could be facilitated through a single window clearance system facilitated by the STU.	❖ As they are State bids, single window clearance should be adopted under ease of doing business.	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines.
17.	**Additional Comment submitted by Sterlite**	❖ Formulation of State committee on transmission akin to National Committee on Transmission	❖ An empowered committee to be formed to check the packaging/ cost/mode of bidding/critical projects/scope etc. ❖ This Committee shall check for prudence in planning the scheme to ensure upstream and downstream are captured in single scheme.	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines.
18.	**Additional Comment submitted by Sterlite**	❖ The minutes of all SCT meetings be made public	❖ All minutes of meeting for the transmission projects to be posted regularly on the website for the public comments/suggestions.	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines.

Sr. No.	Proposed in Draft Guidelines	Comments	Suggestions and suggested Amendment	Maha STU's Views
19.	**Additional Comment submitted by Sterlite**	❖ Project monitoring and debottlenecking by the STU. Regular monitoring of the project and provide administrative support whenever required.	❖ STU shall be entrusted as the nodal agency and be responsible for supporting the developing in resolving issues requiring govt. interventions The information's related all under construction TBCB or RTM needs to be made available to the public to ascertain the health of transmission projects in the State. Monthly/Quarterly reporting may be followed.	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines.
20.	**Additional Comment submitted by Sterlite**	❖ How will the O&M costs pertaining to Bays terminating at an existing substation or new substation of another licensee be shared?	❖ MSETCL must clarify the same.	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines.
21.	**Additional Comment submitted by Sterlite**	❖ What will be the process and timelines with respect to bidding process?	❖ It is submitted to incorporate the best practices specified under the Standard bidding guidelines of the MoP.	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines.
22.	**Additional Comment submitted by Sterlite**	❖ Conflict of interest	❖ It is not clarified whether the STU or its affiliates/ Joint ventures/BPC will also participate in the bidding process. It may be clarified as to how the STU will avoid Conflict of interests	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines.

Sr. No.	Proposed in Draft Guidelines	Comments	Suggestions and suggested Amendment	Maha STU's Views
23.	**Additional Comment submitted by Sterlite**	❖ Nodal Agency	❖ It is understood that MSETCL would be the nodal agency.	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines.
24.	**Additional Comment submitted by Suzlon Energy**	❖ Monthly progress reports for under-construction transmission projects, awarded through the Tariff-Based Competitive Bidding (TBCB) route, are made available online	❖ Monthly TBCB updates will help RE developers identify plans for future grid connectivity	❖ The stakeholder comments and suggestion does not pertain to the draft guidelines for selection of project. Hence, no changes are required in the proposed draft guidelines.
F. General Comments				
25.		❖ **Prayas (Energy Group)** submitted that for any project with a cost exceeding 200 crores, it must undergo review by the empowered committee. The committee should determine the mode of implementation, considering the comparative gestation periods and cost savings of the different approaches. ❖ Further, while considering such projects, the empowered committee meeting minutes should document in detail the progress of past projects and provide guidance for future ones. ❖ Additionally, the empowered committee should assess whether any upgradation or	❖ The checklist for selection of mode of projects is shown in figure 1.	❖ In any case based on scrutiny of Projects as per these Guidelines, STU will recommend to Empowered Committee for execution of Project under TBCB and the final decision will be taken by Empowered Committee. ❖ The other suggestions are not related to Guidelines for Selection of Projects to be executed under TBCB.

Sr. No.	Proposed in Draft Guidelines	Comments	Suggestions and suggested Amendment	Maha STU's Views
		augmentation is part of any existing Transmission Licensee project and decide on the mode of implementation for these projects. ❖ Furthermore, the committee should evaluate the project's criticality and then determine if such project should be pursued under TBCB or RTM based on past experience of gestation and costs.		
26.		❖ **Prayas (Energy Group)** submitted that the winning bidder will be acquiring an SPV and will be responsible for all activities related to providing transmission services, such as obtaining right of way, forest clearance, environmental clearance, statutory, and other necessary approvals. Therefore, it is suggested that the State empowered committee/ STU establish an effective mechanism to monitor all project-related activities and share it in the public domain. ❖ This mechanism should track the status of clearances from all departments on a quarterly basis to prevent delays in the timely completion of projects.	❖	❖ The stakeholder comments and suggestion does not pertain to the Guidelines for Selection of Projects to be executed under TBCB. Hence, no changes are required in the proposed draft guidelines.

Sr. No.	Proposed in Draft Guidelines	Comments	Suggestions and suggested Amendment	Maha STU's Views
		❖ Additionally, the empowered committee/ STU should monitor key aspects such as the scheduled date of commercial operation, time over-runs, and cost over-runs, in order to assess the performance of projects under both TBCB and RTM. Such analysis can be used by the Hon'ble Commission to assess the impact of implementation of TBCB for transmission projects in the state. ❖ Furthermore, such monitoring and public reporting will enhance transparency in the process and encourage sharing of best practices by project developers amongst themselves. The process of project monitoring publicly will also provide a signal to RE project developers in the state for better project planning.		
27.		❖ **Prayas (Energy Group)** submitted that currently, the TBCB threshold for ISTS projects is set at Rs 100 crore. It is suggested that after a few years, the State-empowered committee, in consultation with MERC, may review the	❖	❖ The stakeholder comments and suggestion does not pertain to Guidelines for Selection of Projects to be executed under TBCB. . Hence, no changes are required in the proposed draft guidelines.

Sr. No.	Proposed in Draft Guidelines	Comments	Suggestions and suggested Amendment	Maha STU's Views
		performance of projects under both TBCB and RTM, based on learnings and the benefits from transitioning to TBCB. This can be supported by analysis. Following this evaluation and a public consultation process, the Commission may consider further lowering the threshold limit.		