

S.No.	Regulation	Particulars	Comments and Suggestions
1.	2.1 (d)	(d) "Applicant for GNA" means the following in respect grant of GNA: (i) Applicants covered under Regulation 2(1) (c); or...	<ul style="list-style-type: none"> • Trader has been excluded from the definitions of both Applicant for Connectivity and Applicant for GNA since the Hon'ble Commission proposed that GNA may be applied by grid connected entities only and trading licensees shall not be eligible. We propose that the Hon'ble Commission may make an exception in the above definitions for trading licensees involved in cross-border transfer of power.
2.	2.1(q)	General Network Access or GNA" means the non-discriminatory access to the ISTS granted by the CTU to an Applicant for an estimated maximum injection/drawl for a specified period	<ul style="list-style-type: none"> • Hon'ble Commission may kindly clarify whether there is any minimum specified period required for a GNA application. • Further, clarification is required as to whether the specified period shall be as required by GNA applicant or as per the definition of long term/medium term contract. • It is felt that definition of type of contract in state regulations need to be aligned with the proposed regulation so that the applicant can apply network access in one go. (This will be important for Inter State transactions to be undertaken by an Intra State Entity).
3.	2.1 (x) 2.1 (y)	<p>"Long-term contract" means the Power Purchase Agreement or sale purchase agreement between buyer and seller for sale or purchase of electricity for a period exceeding 7 years;</p> <p>"Medium-Term contract" means the Power Purchase Agreement or sale purchase agreement between buyer and seller for sale or purchase of electricity for a period equal to or exceeding 1 year but not exceeding 5 years;</p>	<ul style="list-style-type: none"> • These definitions do not include an a PPA or SPA between buyer and seller for a period of 6 years. We therefore request the Hon'ble Commission to change either of these definitions to include the above time period, i.e., the Long-term Contract may be applicable for a period exceeding 6 years or the Medium-term Contract may be applicable for a period equal to or exceeding 1 year but not exceeding 6 years. Accordingly, the Hon'ble Commission may finalize such definitions.

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4.	2.1 (z)	<i>"Nodal agency" means the Central Transmission Utility referred to in Regulation 4 hereof</i>	<ul style="list-style-type: none"> Hon'ble commission, kindly clarify whether the nodal agency for GNA application for ISTS under Short-term Open access shall now be CTU instead of RLDC?
5.	5.2	<i>Application fee</i>	<ul style="list-style-type: none"> It is requested that Hon'ble commission may kindly consider reduction of fees and categorize the application fee based on type of contract
6.	6.2	<i>"If Connectivity or GNA application, is not processed by CTU as per the timeline given above, such application for Connectivity or GNA shall be processed free of cost and CTU shall return the application fee paid by the applicant."</i>	<ul style="list-style-type: none"> In the event of failure of CTU in processing of Connectivity or GNA Application within the stipulated timeframe, it is proposed that CTU shall return the application fee paid by the Applicant along with the carrying cost for the period of delay.
7.	7.2	<i>An applicant shall apply for Connectivity to the nodal agency for a quantum equal to installed capacity of generating station less auxiliary power consumption in the specified format as approved by the Central Commission. A captive power plant shall apply for Connectivity for a quantum of maximum exportable capacity proposed to be connected to ISTS.</i>	<ul style="list-style-type: none"> We propose to include the following addendum in this Regulation: <i>"In case Normative Auxiliary Power Consumption under the prevailing Tariff Regulations is revised, the Connectivity and the corresponding GNA for the existing Generating Station should be revised accordingly by the Nodal Agency."</i> Further, it is humbly submitted that suitable provisions may kindly be incorporated in the proposed Regulation for sale of any surplus capacity which may be demonstrated by the generator on account of lower actual auxiliary power consumption than the normative level.
8.	7.24	<i>More than one generator can use the dedicated transmission line connecting their generating station to pooling station of ISTS after formalising all aspects including sharing of the transmission charges and losses of the transmission line among the generators. The transmission charges shall be decided amongst themselves after taking into</i>	<ul style="list-style-type: none"> The dedicated transmission line is used to connect a generating station to the nearest pooling sub-station of the CTU and therefore remains dedicated for a particular generating station. This regulation allows more than one generator to use such dedicated transmission line. However, the Regulation does not stipulate any methodology how to share the transmission charges for dedicated transmission line amongst the generators using the dedicated transmission line. In our humble opinion, since the dedicated transmission

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		<i>account the norms specified in the Tariff Regulations issued by Central Commission from time to time.</i>	line is a regulated asset and is a part of Generation Tariff of the generating station, the Hon'ble Commission may kindly roll out a mechanism of sharing the transmission charges of such lines amongst the generators through an amendment in Tariff Regulations or Sharing Regulations.
9.	7.26 7.25	<i>An "Applicant for Connectivity" may be connected to both inter-State transmission system and intra-State transmission system Transition phase between prevailing LTA Regulations and new proposed GNA mechanism</i>	<ul style="list-style-type: none"> For better clarity, Hon'ble Commission may kindly incorporate that the existing LTA arrangements of all the generators shall remain unchanged and continue after the implementation new proposed GNA mechanism. The Generators shall continue to use the connectivity/network access as per the prevailing demarcated quantum in place to STU and CTU respectively and the commercial liability of the generator towards STU and CTU shall also continue to be corresponding to the demarcated quantum as was in place prior to implementation of proposed GNA mechanism.
10.	7.25 8.1	<p><i>On completion of the dedicated transmission line the generator(s) shall be required to hand over the dedicated transmission line to CTU for the purpose of operation and maintenance. CTU shall be entitled to normative operation and maintenance expenses as per CERC Tariff Regulations. The line shall be under the operational control of CTU for all the purposes.</i></p> <p><i>The dedicated transmission line from switchyard of generating station or Solar Power Park Developer or Wind Power Park Developer or Wind- Solar Power Park Developer to the pooling station of the transmission licensee (including deemed transmission licensee) shall be developed and owned and by the applicant and shall be operated by CTU as</i></p>	<ul style="list-style-type: none"> Section 10 of the Electricity Act 2003 empowers a Generating Company to establish, operate and maintain the dedicated transmission lines. The relevant provision of the Act is reproduced below: <p><i>"Section 10. (Duties of generating companies): --- (1) Subject to the provisions of this Act, the duties of a generating company shall be to establish, operate and maintain generating stations, tie-lines, sub-stations and dedicated transmission lines connected therewith in accordance with the provisions of this Act or the rules or regulations made thereunder.</i></p> <p>Therefore, the proposed Regulations to hand over the dedicated transmission line to CTU for operation & maintenance are contrary to the above provision of the Act. We therefore propose that the generating companies shall be responsible both for construction and O&M of the dedicated transmission lines and such, Normative O&M Expenses shall be retained by the generating</p>

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		<i>per Regulation 7.25. The specifications for dedicated transmission lines shall be indicated by CTU while granting Connectivity.</i>	companies. The Hon'ble Commission may kindly finalize the Regulation accordingly.
11.	8.4	<p><i>Where the dedicated transmission lines have already been constructed or are under construction by ISTS Licensee (including deemed licensees) under coordinated transmission planning:</i></p> <p><i>(i) The transmission charges for such dedicated transmission lines shall be payable by the concerned generating company to the transmission licensee from the date of COD of the dedicated line till operationalization of GNA of the generating station in terms of Regulation 22 of these Regulations;</i></p> <p><i>(ii) After operationalization of GNA, such dedicated transmission line shall be included in the POC pool and payment of transmission charges for the said dedicated transmission line shall be governed as per the CERC (Sharing of inter-state transmission charges and losses) Regulations, 2010 as amended from time to time.</i></p>	<ul style="list-style-type: none"> • We are of the opinion that in case the dedicated transmission lines have been constructed by the CTU/ISTS Licensee and the GNA have been partially operationalized as envisaged in Regulation 22.1, which may restrict the evacuation of the total applied quantum by the Generating Company, the transmission charges for such dedicated transmission lines shall be payable by the concerned generating company to the transmission licensee only to the extent of actual operationalized vis-à-vis the quantum of the GNA applied for. • Further, we propose that the dedicated transmission line should be included in the PoC pool for payment of transmission charges only after full operationalization of the GNA related to the construction of such dedicated transmission line. <p>We request the Hon'ble Commission to finalize the Regulation accordingly.</p>
12.	9.2	<i>A generator shall be allowed to draw start-up power from the grid or inject infirm power into the grid only through dedicated line after grant of Connectivity and GNA except where LILO has been allowed as part of coordinated transmission planning.</i>	<ul style="list-style-type: none"> • It is not clear why drawl of start-up power from the grid or inject infirm power into the grid is not allowed through LILO. Para 2.9.1 of the Explanatory Memorandum of the Draft Regulations state that "6.12.3 Start Date of Connectivity...A generator will be allowed start-up power only through dedicated line. However, in exceptional cases CTU in consultation with RLDC/NLDC/CEA may consider drawal of start-up power through LILO of

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			<p>existing lines.” In line with the above recommendation of the Committee, we request the Hon’ble Commission to finalize the Regulation accordingly.</p>
13.	10	<p><i>Metering shall be done at the interface point of connection of the generator with transmission system of licensee as specified in the CEA Metering Regulations subject to following:</i></p> <p><i>(a) In case dedicated transmission Lines are owned/ constructed by a generator, such metering point shall be at the pooling sub-station of ISTS licensee.</i></p> <p><i>(b) In case generator is connected to more than one pooling station, metering shall be at the bus bar of the generating station.</i></p>	<ul style="list-style-type: none"> • This will result in disparity between the power stations which are connected to one pooling sub-station and those which are connected to more than one pooling sub-stations. • It is suggested that metering may be done at the Generating Station only. It is felt that if, due to commercial contract, the loss on the dedicated transmission lines is to be borne by the Generator, the estimated losses for such dedicated line may be computed and booked to the Generator.
14.	12.3	<p><i>If an intra-State entity is applying for GNA, concurrence of the STU shall be obtained in advance and submitted along with the application to the nodal agency.</i></p>	<ul style="list-style-type: none"> • It is submitted that there may be situations when a commissioned generator connected to STU need connectivity to CTU due to lack of long-term power sale opportunities within the state in which it is located. Further, the consent is not issued by STU till the existing connectivity is surrendered by the applicant generator with STU network. • For addressing this problem of generator when the generator is stuck in a situation when it is neither connected to STU nor to CTU (as it has applied for connectivity change to CTU after collection of NOC from STU), the Hon’ble Commission may kindly consider submission of such applications to CTU in two stages: <ul style="list-style-type: none"> i. Application for carrying feasibility studies by CTU for change of connectivity from STU to CTU. For this application, no consent of STU shall be required.

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			ii. Based on feasibility studies by CTU, the generator will have to evaluate the economic viability of the proposal of CTU (viz. capital cost required for dedicated transmission line, likely period required for construction etc.). Only then, the generator will apply for connectivity and GNA from a future viable prospective date with consent of STU. During the intermittent period, the Hon'ble Commission may kindly incorporate suitable clause so that the generator is allowed to transact power through STU network till the CTU connectivity is made ready
15.	16.5	<p><i>(b) Where CGP is not located at the same place as captive load, the CGP may take Injection GNA corresponding to the captive load to be met and for any surplus power.</i></p> <p><i>(c) The captive user of CGP may seek drawal GNA if it intends to draw power through long or medium or short term agreement through ISTS through connection point of CGP and in such cases, it shall be subject to the charges as may be imposed by the respective State Commission. The scheduling segregation among power sold by CGP and power purchased by captive user shall be done by concerned RLDC /SLDC as the case may be.</i></p>	<ul style="list-style-type: none"> • The application for the CGP seeking injection GNA and that of the CGP user seeking drawal GNA should be considered coherently by the CTU. It would not be logical to grant any of the above application exclusive of the other. Therefore, the application for Injection GNA and drawal GNA may be allowed to be made together by the CGP and its user.
16.	19.1	<p><i>GNA Applicants other than STUs shall be required to submit Access Bank Guarantee of Rs. 20 lakh/MW.</i></p>	<ul style="list-style-type: none"> • Hon'ble commission may kindly consider making the validity period of Access Bank Guarantee in line with the GNA application period.

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17.	22.1	<i>.... GNA to the extent which can be operationalized without affecting the security and reliability of the grid shall be operationalized by CTU and the GNA customer shall pay transmission charges for the quantum of GNA operationalized.</i>	<ul style="list-style-type: none"> • In case of part operationalization of GNA, there may be situations during part operationalization where the technical minimum criteria of a Generator limit the use of such part capacity being offered or the transaction does not result in viable economies of scale for procurer/seller. • The Hon'ble Commission may kindly consider not imposing any obligation on payment of transmission charges to the GNA applicant for not availing such partly offered capacity till such full capacity is offered by CTU.
18.	24.1	<i>Relinquishment of GNA</i>	<ul style="list-style-type: none"> • The Hon'ble commission may kindly clarify whether GNA applicant shall be allowed to relinquish part capacity and if allowed, kindly clarify the GNA charges to be payable by Generator. • Further, there should be difference in GNA exit charges of applicants relinquishing GNA with transmission augmentation and without transmission augmentation.
19.	25.2 25.3	<p><i>For generating stations where LTA (including target region) has been sought for part capacity and the same has already been operationalized or has not been operationalized, the generating station shall apply for GNA for additional quantum (balance quantum for which there is no LTA) within 3 months from the date of notification of these Regulations. CTU shall grant GNA to such generating stations from the date of availability of transmission system</i></p> <p><i>In case no application is received from the generating stations as per clause 25.2 within the stipulated time, such generating station shall not be</i></p>	<ul style="list-style-type: none"> • As per the draft GNA Regulation 2017, the Generating station which have not tied up the full capacity i.e. (Installed capacity minus APC) in long term PPAs, will have to apply for GNA for the balance capacity within 3 months of notification of the Regulation. • More clarity is required as to how the transmission charges will be computed for a Generator who is not able to generate power due to high cost of generation or non-availability of fuel. • A large capacity of thermal power projects is stranded due to non-availability of PPAs and coal linkage. If the transmission charges are levied on the installed capacity, it would create further distress for the stranded power projects which is already suffering due to capital investment made. • It will also be unreasonable to levy transmission charges on the quantum of GNA of such stranded Generator.

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		<i>allowed to schedule power beyond the quantum of LTA till it applies for GNA.</i>	
20.	27.8	<i>In case the alternative arrangement as provided in the Regulation 27.7 cannot be provided, the transmission licensee shall pay proportionate transmission charges to the generator.</i>	<ul style="list-style-type: none"> • This is not an equitable approach for compensation for the generating companies. The generating companies shall be liable to pay for the transmission charges to the ISTS as envisaged in Regulation 27.3. Such payment would enable the ISTS to recover the Transmission ARR for the corresponding year. In case of delay by the ISTS, the generating companies should also be paid the Fixed Charges, upto Normative Availability/PLF, whether approved u/s 62 or discovered u/s 63 of the Act. • In case CTU has not commissioned its specified transmission line or elements as per SCOD and the generator has already achieved COD, there will be a direct loss to the extent of its unrecovered fixed cost. Proportionate transmission charges proposed as compensation may not be adequate to cover the under recovered debt obligation of the generator. It is requested that Hon'ble commission may kindly consider suitable compensation mechanism to the generator till the operationalization of transmission line is done by CTU.
21.	28.2	<i>CTU shall coordinate with STU to ensure that ordering for State lines are done such that it is commissioned matching with ISTS lines.</i>	<ul style="list-style-type: none"> • It is kindly submitted that an Intra-state Generator should be adequately compensated due to delay in construction of transmission systems by either/both STU and CTU. Under such situations, it is proposed that compensation mechanism for delayed operationalization of interstate transactions carried by intra state entities should be adequate and clearly demarcated.