Annexure-A

Tata Power-DDL Comments on (Draft) GNA in line with CERC notice dated 14th Nov 2017.

Background: From the (Draft) GNA Regulations, 2017 it is understood that General Network Access ("GNA") will replace Long Term Access ("LTA"), Medium Term Open Access ("MTOA") and Short Term Open Access ("STOA"). In other words, GNA would be the total quantum in MW for which access will be granted to the Discoms/Generators through the ISTS along with certain predefined margins. Further, we understand that the transmission planning as well as sharing of transmission charges will be done on the basis of GNA granted by CTU to the applicant.

Tata Power-DDL point wise submission has been appended below:-

5.3 STUs on behalf of distribution licensees and other intra-State entities seeking GNA to ISTS, shall apply for GNA every year for the next 5 year period. The Application fee shall not be levied on STUs. STUs shall indicate quantum of GNA sought at each interconnection point of STU with ISTS Proposed Transmission Planning Process:

Tata Power-DDL observations:

As per the Explanatory Memorandum to the (Draft) GNA Regulations, 2017, the working philosophy in respect of the above is mentioned below:

> *6.3.4 Planning of Transmission System & its Implementation*
> *(a) …….*
> *(b) The projected/anticipated quarterly maximum import/ export requirement in respect of a State (which should be called its Demand/Injection GNA respectively) from ISTS will be provided by the State Transmission Utility (STU)* ***4 years before for a period of 5 years to CTU****. Such data should be provided by concerned STU after taking into*

account the anticipated demand figures from each DISCOM in the State and likely generation from the generating companies having generating stations in the State. ***For example, in January 2017, STU should provide its peak quarterly requirement from ISTS (Injection/ Withdrawal GNA) for years 2021, 2022, 2023, 2024 and 2025****. Such data should be provided on Annual rolling basis i.e.* ***in January 2018, STU should provide its GNA for 2022-2026****.* ***STU can revise its projected GNA for the year 2022 in the year 2018 but would not be allowed to revise the same for the year 2021 keeping in view construction timeline for transmission system being of the order of 3 years plus 1 year processing time****. For the first year of implementation of GNA, STU should provide Injection/Withdrawal data for immediate 4 years also. In the present example for years 2017, 2018, 2019 and 2020. This will aid in estimating projected GNA for subsequent years."*

From further reading of the explanatory memorandum it is it given to understand that a utility needs to provide the peak quarterly requirement from ISTS (Injection/Withdrawal GNA) for the years 2022,2023,2024,2025 & 2026 in the month of January 2018, and the same is to be provided for the subsequent years on a rolling basis.

In our view the above proposed mechanism of submission of GNA quantum (MW) involves some inherent complexities as mentioned below:

1. It is not practical to assess the GNA requirement (Withdrawal/Injection) for such a longer tenure (four years in advance) due to a number of uncertainties associated in the demand forecast. The total transmission access requirement of a utility over a period of time depends on the projected demand growth rate which itself is not certain. In case the CAGR of demand remains lower (in the next four years) than the projected, the utility may actually require to draw a considerably lesser quantum from ISTS and may end up paying higher charges for the inflated GNA quantum projected for future years. The same holds true even in the case of the actual demand growth being more than the projected and the utility is drawing more power from the Grid against its projected GNA quantum, again leading to GNA violation penalty.

2. It may also be noted that a utility schedules power on merit order basis. There could be a scenario when the cost of power from an ISGS increases when compared with the cost of power from a State Genco station. In such a scenario a utility will rely more upon the power from the State Gencos & accordingly schedule more power from the same. The same would lead to its scheduling of power getting reduced from ISGS whereas the corresponding GNA quantum would be higher which would have been taken as per the prevailing merit order when cost of power from ISGS was less than the cost of power from State Gencos power station.

3. In view of the ongoing obligation towards RPO compliance, the utilities also need to have accurate information on upcoming RE generation projects and their connectivity with the GRID (CTU or STU level) to assess that how much quantum of RE power has to be imported through CTU and how much can be generated within the state itself through Distributed Energy Resources like Roof Top Solar etc. Further, there could be some consumers who might be seeking Open Access in next 2 to 3 years, with no intimation as of now. In such a scenario it would be extremely difficult to forecast GNA requirements for next 5 to 9 years (considering the same to be provided 4 years in advance for next 5 years). Further, the Indian Government has also launched the National Electicity Mobility Mission Plan (NEMMP) with an ambitious plan to achieve 6-7 million sales of electric and hybrid vehicles year on year by 2020 onwards. As a result, in the near term, there would be definitely a surge in demand of electric cars and subsequent demand of electricity. However, its actual impact cannot be ascertained as of now. Under such a scenario the forecasting of GNA would be difficult for period of 5-9 years down the line. Until and unless a utility has accurate information on the above, GNA (withdrawal) quantum cannot be estimated correctly.

4. Further, the draft regulations, also stipulates for declaration of injection GNA. From a utility perspective, it will require injection GNA only when it requires to sell surplus power. Standing today, to project the GNA injection quantum for next 5-9 Years is difficult, because surplus power for such a long period cannot be estimated. It would be fallacious to estimate the quantum of power to be sold/purchased by a utility under these different access types 5 to 9 years down the line. Moreover, the surplus

quantum would vary on a slot wise basis and the variation can be huge to the tune of 8 to 10 times,(example-in few slots a utility might be exporting only 40 MW, whereas, in others it could be exporting around 300-400 MW. Accordingly providing injection GNA is difficult and prone to errors.

5. The draft regulations, provides a flexibility of revising the projected GNA quantum, 4 years in advance (I.e. **STU can revise its projected GNA for the year 2022 in the year 2018** but would not be allowed to revise the same for the year 2021 keeping in view construction timeline for transmission system being of the order of 3 years plus 1 year processing time. The same would be difficult considering the submissions made at point number 2, 3 & 4 above.

TPDDL Suggestions:

Notwithstanding the above mentioned difficulties, GNA is a welcome approach & Tata Power-DDL would like to provide suggestions to the Hon'ble Commission for kind consideration:

1. Submission of withdrawal GNA by a Utility/Discom should be done for next 5 years considering the current year as the base year. For example, in 2017, the withdrawal GNA (quarterly basis) should be submitted for 2018,2019,2020,2021 & 2022. The same practice should be a followed each year on a rolling basis. For example in 2018, the same should be submitted for 2019,2020,2021,2022 & 2023. The time gap of submitting GNA quantum 4 years in advance for the next 5 years should be done away with.

2. Revision in GNA quantum for any particular year should be permitted at least two years in advance. For example, against GNA requirement submitted for the year 2022, utility should have the flexibility to revise the same by 2020.

3. DISCOMS should be given a flexibility to submit GNA (MW) quantum in terms of a base values +/- a definite percentage of permissible deviation, considering the seasonal variations "or" on a monthly/quarterly basis for the different months of a year. Say for

example, for summers it can submit a GNA of 1000 MW +/- 20%, and for winter the same may be 800 MW +/- 20%.

4. **Scheduling of Short Term Power directly from Generation Source:-**The declaration of injection GNA should be done away with in the case of a utility. Since all Generators need to obtain Injection GNA mandatorily, the energy flow in the system would always be equal to the energy requirement at any point of time and available energy will always be more than the energy requirement. In the event of banking and import required by Utility A from Utility B, the same can be by way of an agreement without incurring any short term transmission charges for either of Utility A or Utility B, since the utilities would have already taken GNA corresponding to their withdrawal quantum based on their respective peak demands. Hence, the present methodology of incurring short term charges under banking, bilateral and exchange transactions would be done away with. There should be one PoC charge for Long term, Medium Term and short term. The short term transmission charges can be done away with in the following manner:-

   a) **Banking of Power**:- Since banking involves transmission of power from Utility A to Utility B and both Utilities will be paying transmission charges in line with their withdrawal GNA, there is no separate requirement of paying short term charges for banking import & export of Power. Also the Hon'ble Commission can explore the possibility of direct scheduling of power directly from the source (Generation Source) to Utility A. For example, if Utility A needs to import power from Utility B, then there should be a mechanism whereby Utility B need not first import power from its generation sources & then export to Utility A. Scheduling of power directly from Generation Source of Utility B, identified by Utility B for Utility A should be possible. Utility B could identify a Generator or a mix of Generators who would directly schedule to Utility A. The Generator source should be allowed to change in 6 time blocks as per the decision of Utility B. However, the liability of payment of fixed and variable charges would remain with the original utility (in this case Utility B) which has a direct PPA with the Generator.

b. <u>Sale & Purchase of short term/medium term power through a bilateral route:-</u>

In case of bilateral sale from one Utility to the other, mechanism as specified under banking of power can be followed. Utility B would bid in say DEEP portal for selling power to Utility A & upon being successful would get power scheduled directly from one of its generator sources to Utility A. This would avoid the need for bringing power first by Utility B to its own periphery from its generation source & then scheduling the same from Utility B to Utility A. It would avoid multiplicity of transmission charges.

c. <u>Sale purchase through Exchange: -</u> The Exchange can be made responsible for informing the nodal agency CTU of the sale/purchase done by a utility or sale done by a generator. In such a case, if it is found by the CTU that a utility has done purchase in excess of its GNA, then bill for the corresponding excess quantum can be done by the CTU through a separate noting in the main bill. The same has been further explained under our suggestion to 35.1 & 35.2.

5. <u>Rationalization of LTA:-</u>Tata Power-DDL proposes that GNA regime should provide an opportunity of rationalization of LTA to those Discoms who are having LTA's corresponding to their peak demand or in excess of their peak demand. The following has been explained through an example below:

Illustration-Utility A		
1	Peak Demand (MW)	2000
2	State Generation	600
3	Current LTA from ISGS	1600
4	Peak Demand -State Generation (MW) (1-2)	1400
5	GNA requirement total (MW) (4)	1400
6	GNA requirement actual (MW) considering the 20% margin.	1170
* 20% escalation in 1170 MW is around 1404 MW.		

In the above scenario, we would seek confirmation that can a utility provide a withdrawal GNA quantum of 1170 MW for a particular period and will the same be considered for calculation of POC slab rates as well as billing of transmission charges under Bill#1.

6. **Exploring 2 Part Tariff for Transmission:-**With the advent of GNA, the sharing of transmission charges among different ISTS customers is definitely going to be rationalized further, wherein, we can expect that every user is paying transmission charges in line with its respective utilization of the network. In the same direction, Tata Power-DDL proposes to explore the possibility of implementing a two part Transmission tariff- regime for pan India sharing of transmission charges, in which 50% of the monthly transmission charges of ISTS is recovered through the capacity charges route (on the basis of GNA held by each customer) and the remaining 50% is recovered on the basis of actual energy (in Mu's) scheduled by a ISTS customer. The same has been illustrated through an example as mentioned below:

	Proposed mechanism for 2 part transmission charges (4 beneficiaries considered for simplicity)	
	Particulars	**Rs.**
1	Total MTC (Monthly Transmission Charges) of the ISTS	200
2	50 % MTC (Monthly Transmission Charges) of the ISTS	100
3	Total GNA (MW) of the National Grid	100
4	Part 1 of transmission tariff (Rs./MW/month)	1
5	Total Transmission charges to be recovered as fixed charges as per GNA	100
6	Energy actually imported by beneficiary 1 through ISTS (Mus)	10
7	Energy actually imported by beneficiary 2 through ISTS (Mus)	20
8	Energy actually imported by beneficiary 3 through ISTS (Mus)	40
9	Energy actually imported by beneficiary 4 through ISTS (Mus)	30
10	Energy actually imported by all the beneficiaries through ISTS (Mus)	100
11	Charges payable by beneficiary 1 in terms of energy drawn (Rs./Mu/Month)	10
12	Charges payable by beneficiary 2 in terms of energy drawn (Rs./Mu/Month)	20

13	Charges payable by beneficiary 3 in terms of energy drawn (Rs./Mu/Month)	40
14	Charges payable by beneficiary 4 in terms of energy drawn (Rs./Mu/Month)	30
15	Total transmission charges to be recovered as variable charges in term of energy drawn	100
16	Total MTC recovered (5+15)	200
*	Slabbing of rates worked out at S. No 4 may be done as per existing practice so as to ensure that the part 2 of the monthly charges gets fully recovered.	

Benefits of having a two part tariff

a) Even if the GNA quantum specified by a utility is not accurate, it pays 50% of the charges for the same.

b) Actual utilization would have a direct bearing upon recovery of charges, which means a utility consuming more from ISTS would be actually paying more. This would also lead to State Generation/Load center Generation being optimally utilized.

3.3, 25.2 & 25.3

3.3. Generating stations who are already connected to the ISTS grid for part of their installed capacity shall seek Connectivity and GNA to ISTS for balance capacity.

25.2 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

25.3 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 allowed to schedule power beyond the quantum of LTA till it applies for GNA.

Tata Power-DDL submissions:

Clause nos.3.3, 25.2 & 25.3 as mentioned above deals regarding provisions of obtaining GNA corresponding to the balance capacity of the generating stations in case they have LTA corresponding to only a part capacity of their Generating station. However, no penal charges have been notified in case the generators do not apply for GNA corresponding to their remaining capacity. The only deterrent for them is that if they do not apply for GNA within 3 months from the date of notification of these Regulations, such generating stations shall not be allowed to schedule power beyond the quantum of LTA till it applies for GNA. In absence of any financial implication, such generators can delay applying for GNA as long as they wish. However, it is pertinent to note that, in the meantime the transmission charges capacity created to cater for these generators will be borne by the existing long term customers of the ISTS. For instance if a generator of 1000 MW has obtained a GNA of 1000 MW and supplies power to a utility through a PPA, then in such case he will be liable to pay the full transmission charges corresponding to 1000 MW, without any undue burden on other customers. However, if the generator has an access of 300 MW only and he delays the application of another 700 MW for say one year, in such case for this one year period, other long term ISTS customers will pay transmission charges corresponding to these 700 MW. The present installed capacity of India is around 330 GW and the peak demand met during the financial year 2016-17 is around 159 GW. From the same it is evident that around 48% of the installed capacity is sufficient to meet the national peak demand and around 52% of the installed capacity is remaining stranded even during the peak hours. A majority share of this stranded capacity is still not having LTA's in place and transmission charges corresponding to the same is being paid by the existing customers of the ISTS. Tata Power-DDL suggests that for such Generators the GNA charges should be increased in the event, they apply for GNA after a lapse of 3 months of the notification of these Regulations.

11.4 In case of allocation of power by Ministry of Power, Govt. of India in respect of generating stations owned or controlled by Central Government, the concerned generating company may make application to CTU for GNA on behalf of the allocatees **on the basis of their written authority for making the application**. After grant of GNA, it shall be the responsibility of the concerned generating company to facilitate signing of GNA Agreement by the allocatees with CTU within the stipulated period as prescribed in these Regulations.

Tata Power-DDL submissions:

We support the requirement of **written Authority of the allocatees** for making GNA application by generating stations owned or controlled by Central Government. This would ensure that the Generators stick to time frame to ensure COD in time and does not lead to utilities making alternate arrangements in the event of delayed Commissioning of the Generation projects.

18. Scheduling by SLDC

18.1. With operationalization of GNA, SLDC (for DISCOM/ any other intrastate entity) may be able to schedule its power under any term (long- /medium-/short-term) as the case may be.

18.2. If it is not possible to accommodate the quantum requested by a state on day ahead basis because of transmission constraint in the ISTS, the SLDC shall provide its revised schedule with equal priority to all type of transactions as per the relative economics of the transactions to the SLDC on day ahead basis.

The complexities observed in the schedule revision methodology to adopt in case of corridor congestion as specified in the draft GNA regulations has been explained through an example:

Case 1- Revision as per LT PPA			
Access Details	State-B		State-A
	DISCOM 1	DISCOM 2	DISCOM 1
GNA	2500	1500	8000
Long term PPA	(A)700	(B)500	(C)4000
Total Corridor requirement (MW)	12000		
Total Corridor Availability (MW)	(D)9000		
Corridor Allocation (MW)	(E)1212	(F)865	(G)6923

E = A/(A+B+C)*D, F = B/(A+B+C)*D G= C/(A+B+C)*D

Tata Power-DDL observations:

1. The approach for corridor allocation adopted in case of corridor constraints as provided in the explanatory memorandum is based on the quantum of LT-PPA held by a customer (illustrated in case 1 above). However, we find it pertinent to mention that if GNA quantum is to be used for POC slab rate calculation, the same should be used for corridor reallocation also. An alternate approach has been explained in case 2, wherein, corridor reallocation has been done in respect of GNA held by the beneficiary. In case 2 proposed below, DISCOM-1 & DISCOM-2 of state B get more corridor allocation as compared to case 1. Methodology adopted in case 2 will urge the Discoms with less LT-PPA to provide more realistic estimates of the GNA quantum.

Case 2- Revision as per GNA			
Access Details	State-B		State-A
	DISCOM 1	DISCOM 2	DISCOM 1
GNA	(A)2500	(B)1500	(C)8000
Long term PPA	700	500	4000
Total Corridor requirement (MW)	12000		
Total Corridor Availability (MW)	(D)9000		
Corridor Allocation (MW)	(E)1875	(F)1125	(G) 6000

E = A/(A+B+C)*D, F = B/(A+B+C)*D G= C/(A+B+C)*D

2. Further, if against a GNA of 1000 MW a Discom gets only 800 MW for a particular period (on a day ahead basis) then how the credit corresponding to (200 MW less quantum scheduled from ISTS) would be passed on to the beneficiary? The same needs further clarity.

3. During the period of transmission constraints, clause 18.2 of the draft-GNA regulations specify that "the SLDC shall provide its revised schedule with equal priority to all type of transactions". Whereas **clause 2.16.2** of the explanatory memorandum states that in case of constraint in transmission corridor, the transactions already scheduled shall be curtailed by RLDC on the basis of duration of contract with **short term contracts shall be curtailed first followed by medium term and long term contracts. In case of the customers of same category, curtailment shall be carried out on pro rata basis.** The above needs further clarity as **clause 17.4** of the draft-GNA regulations specify that while assigning priority of scheduling "**CTU shall give priority to long term PPAs over medium term PPAs and to medium term over short term PPA and among PPAs of same category under pro-rata basis"**.

Tata Power-DDL Submissions:

We request Hon'ble commission to issue clarifications regarding the schedule revision methodology to be adopted by RLDC/SLDC and its commercial impacts on the beneficiaries, to avoid any mis-interpretation and revisit the corridor allocation methodology to be adopted in case of corridor constraints in line with the option proposed by Tata Power-DDL above. Accordingly, we suggest that corridor allocation should be based on the GNA of a utility and not on existing long term PPA's. Further, the curtailment should be on pro-rata basis on immediate basis followed by option to utility which would be based on the commercial arrangements of its imports from Long term, Medium term, Short Term (Spot/Bilateral Markets)

23. Intimation regarding termination of Power Purchase Agreement:

23.1. Where the entire or part of the Power Purchase Agreement (PPA) of the GNA customer is terminated in accordance with the provisions of their Agreement or through determination by a court or Tribunal or Appropriate Commission of competent jurisdiction or in the event of mutual termination, it shall be incumbent on the GNA customer to give intimation about such termination of PPA to CTU and respective RLDC immediately and not later than one week from the date of such termination. CTU and RLDCs shall utilise the corridor for scheduling of power for other customers depending on period and quantum.

23.2. On termination of the Power Purchase Agreement the GNA customer shall be liable to pay the transmission charges as per applicable Regulations.

23.3. CTU shall consider the transmission capacity so made available for scheduling of transactions for other GNA Applicants.

Tata Power-DDL Observations:

1. Under Regulation 23.1 above, it has been mentioned that **"*it shall be incumbent on the GNA customer to give intimation about such termination of PPA to CTU and respective RLDC immediately and not later than one week from the date of such termination*".** In such case, who will be considered as the GNA customer in regulation 23.1 as well as 23.2 (The Generator or the Utility).

2. Further, what will happen in case a part quantum (MW) out of a PPA between a distribution utility and a generator is reallocated to a different utility for a predefined time period? Who will intimate the CTU and respective RLDC in such case? The Generator, surrendering utility or the utility to whom the power is being scheduled.

3. Further, how the adjustments will be made in the GNA charges of both the utilities in the above case.

Tata Power-DDL suggestions:

As mentioned in the provision 23.2 of the (Draft) GNA Regulations, 2017 that *"On termination of the Power Purchase Agreement the GNA customer shall be liable to pay the transmission charges as per applicable Regulations"*, the Hon'ble commission is requested to share the draft of the Revised Sharing Regulations, before finalizing the GNA regulations.

33. Charges for Deviation: Deviation charges shall be as per CERC (Deviation Settlement Regulations) 2010 Unless specified otherwise by the State Commission concerned, the Deviation rate for intra-State entity shall be 105% (for over-drawals or under generation) and 95% (for under-drawals or over generation) of the Deviation rate at the periphery of regional entity.

Tata Power-DDL submissions:

Which deviation charges are being considered here is not clear. Is it not as per CERC 2014, DSM regulations? We request for a clarification to the above.

34. Transmission Corridor Allocation for power markets

5% of each corridor for which separate ATC is declared shall be reserved for day ahead collective transactions at the power exchanges. In case of non-utilisation of the corridor by exchanges, National Load Despatch Centre (NLDC) shall release the capacity for contingency market. The percentage of reservation shall be reviewed after five years of operation

Tata Power-DDL submissions:

1. The above is a welcome move for promotion of Short term markets and to bring in competition and resultant reduction in power purchase cost. In our views currently 10% of the corridor should be reserved for collective transactions (total volume procured under short term in FY 16-17 is 10% as per CERC Report on Short term Power Market in India: 16-17). The same may be reviewed further in the years to come.

2. Further, we may also have different percentage of corridor reserved for power markets based on peak and off-peak hours based on the market conditions and prevailing rates in short term power markets.

35. Sale of surplus power by distribution licensee

35.1 In case a distribution licensee intends to sell surplus power available to it from its share in the generating stations located within the State, it may seek injection GNA for the said quantum.

35.2 In case a distribution licensee intends to sell its contracted power from an ISGS to any third party, the distribution licensee shall be allowed to sell power at the injection point of that ISGS.

Tata Power-DDL Observations:

1. Distribution licensee has power from a pool of generating stations. In case of sale of surplus power, it will be difficult to identify whether the power is from stations located within the state or from outside the state because it is never possible to trace the source of power being sold exactly. However, for a simplistic illustration a two source sale model has been appended below. The problems anticipated in typical exchange sale is illustrated below:

Time slots	Example of sale of surplus power through power exchange			
	Source of Power			
	within the state	Outside the state	Total sale (MW)	Injection GNA required for (MW)
Slot-1	100	100	200	100
Slot-2	200	0	200	200
Slot-3	50	150	200	50
Slot-4	0	200		0

From the table above it can be seen that in different time slots there may be different Sources (generators) of surplus power being sold. It is not practical to figure out as to in which slot we are selling power from intra-state generator (requiring injection GNA) and in which slot we are selling power from IGGS. Further, estimation of Injection GNA is also not possible on RTC basis.

2. Further, in case a distribution licensee sells its contracted power from an ISGS to any third party, then in such case will he require to pay injection GNA charges again considering that, the same licensee is already paying the withdrawal GNA for the purchase of the same power under long term?

3. If there are no short term charges under GNA, then how the whole mechanism of obtaining injection GNA will work and how the payment of transmission charges will be done under short term transactions such as banking transactions and power exchange sale purchase transactions?

4. Further, Surplus quantum may vary in different period/time slots of the year, and accordingly, sale or purchase of power by a utility may be done on a short term basis, during different parts of the year/month or even different time slots during a day or on intraday basis. Whereas, GNA by and large is understood to be a long term transmission charges recovery tool. If there is no transmission charges applicable for short term sale purchase, it's ok. However, if injection GNA comes with some

associated transmission charges, clarity is required as to how the short term transmission charges would be calculated on a monthly, weekly or per unit basis.

Tata Power-DDL Suggestions:

In addition to provide the clarifications to the points raised by Tata Power-DDL above, we request Hon'ble Commission to adopt a simple methodology to be adopted for sale of surplus power as proposed below and the philosophy of injection GNA should not be applicable for the Discoms/utilities:

Seller	
Utilty -A	Export of Power (MW)
Banking export	100
Exchange sale	100
Bilateral sale	100
any other sale	100
Buyer	
Utilty -B	Import of Power (MW)
Banking import	100
Exchange Purchase	100
Bilateral Purchase	100
any other Purchase	100
Total Purchase	400
LT-PPA-CSGS	1000
State Generation	600
Total import from ISTS	1400
Total GNA (say)	2000

Whatever, utility –A is selling, utility B is paying for the same, as the same is captured in its withdrawal GNA. If it goes beyond the extent of its GNA quantum, utility B is liable to pay for penal charges as per GNA regulations. So in case of sale of surplus power by utilities, there is no need to obtain injection GNA and further no charges for sale of surplus power should be paid by the selling utilities.