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**Fwd: Submission of revised views of GRIDCO on draft GNA Regulations, 2021**

1 message

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**Abhishek Rohilla** <abhishek.rohilla@delhi.gov.in>  
To: cerc abhishek <cerc.abhishek@gmail.com>

26 February 2022 at 08:25

Regards,  
Abhishek Rohilla  
Dy. Chief (Engg.)  
Central Electricity Regulatory Commission  
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----- Forwarded Message -----

From: "Shilpa Agarwal" <shilpa@cercind.gov.in>  
To: "Abhishek Rohilla" <abhishek.rohilla@gov.in>, "Ratnesh Kumar" <ratnesh.cea@gov.in>  
Sent: Friday, February 25, 2022 9:47:30 PM  
Subject: Fwd: Submission of revised views of GRIDCO on draft GNA Regulations, 2021

----- Forwarded Message -----

From: sgm pp <sgm.pp@gridco.co.in>  
To: Sanoj Kumar Jha <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>  
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Sent: Fri, 25 Feb 2022 19:53:34 +0530 (IST)  
Subject: Submission of revised views of GRIDCO on draft GNA Regulations, 2021

Madam / Sir,

PFA the revised views of GRIDCO on draft CERC (Connectivity and General Network Access to Inter State Transmission System) Regulations, 2021, for kind consideration.

Further findings / views, if any, shall be submitted at the time of public hearing on 07.03.2022.

Regards,

Chief General Manager (PP),

GRIDCO, Bhubaneswar

**Gridco Views on draft GNA Regulations, 2021 - rev6 (25.02.2022).docx**

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## **Views/Comments of GRIDCO on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.**

CERC has published the draft “Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-state Transmission System) Regulations, 2021” along with corresponding Explanatory Memorandum inviting comments/views from the stakeholders. The said draft Regulations (herein after termed as ‘GNA Regulations’) intends to address the connectivity to ISTS as well as Long-term Access, Medium-term Access and short term access to the ISTS as a whole.

In response, GRIDCO likes to offer its views on the said draft Regulations as given hereunder:

### **Requirement to comply applicable mandates of Electricity Act, 2003, National Electricity Policy and National Tariff Policy**

1. Although the Explanatory Memorandum to the draft GNA Regulations has brought out the need to go for GNA Regulations inter-alia for development of robust and resilient transmission system, to meet open access with increasing penetration of renewable energy and due to increasing number of players in the power sector, but the proposed draft Regulations has not addressed the following mandates as per Electricity Act, 2003, prevailing National Electricity Policy and National Tariff Policy:
  - i) As per Section 38 (2) (c) of Electricity Act- *“Central Transmission Utility to ensure development of an efficient, co-ordinated and economical system of inter-State transmission lines for smooth flow of electricity from generating stations to the load centres.”*
  - ii) As per Section 61 (c) of Electricity Act- *“the factors which would encourage competition, **efficiency, economical use of the resources**, good performance and optimum investments.”*
  - iii) As per Section 61 (d) of Electricity Act- *“**safeguarding of consumers’ interest** and at the same time, **recovery of cost of electricity in a reasonable manner.**”*
  - iv) Clause 7.3 (2) of National Tariff Policy stipulates- *“ All available information should be shared with intending users by CTU/STU and load despatch centres, particularly **information on available transmission capacity** and load flow studies.”*
  - v) But neither the draft regulations nor its explanatory memorandum has come out with any reasoning with relevant data on comparison how the GNA Regulations would result in an efficient and economical ISTS in terms of increase in Available Transfer Capability/Transmission

capacity and curtailment of the stranded capacity/assets, thereby safeguarding the consumers' interest and recovery of cost of electricity in a reasonable manner.

- vi) Therefore, CERC may publish a fresh Explanatory Memorandum/draft Regulations with the required information on present vis-à-vis the estimated improvement in Total Transmission Capacity, Available Transmission Capacity/Available Transmission Capability, margin in ISTS, Inter-regional Available Transfer Capability and stranded capacity/assets in the ISTS for appraisal of the public on benefits of GNA Regulations.
2. Following are mandates as per Electricity Act, 2003 and prevailing National Electricity Policy in terms of payment of transmission charge for availing open access:
- i) As per Section 38 (2) (d) (i) of Electricity Act- *“to provide non –discriminatory open access to its transmission system for use by any licensee or generating company on payment of the transmission charges;”*
  - ii) Clause 5.3.4 of National Electricity Policy stipulates- *“Non-discriminatory open access shall be provided to competing generators supplying power to licensees upon payment of transmission charge to be determined by the appropriate Commission.”*
  - iii) In contradiction to the above mandates as per Electricity Act-2003 and National Electricity Policy, the draft Regulations has provision of only one- time transmission charge from Generators, which is not commensurate with the transmission charge corresponding to open access for supply of power by Generators through ISTS.
  - iv) Notwithstanding the reasoning given in the Explanatory Memorandum on assigning of all transmission charges to drawl entities and the said practice being followed by some countries, it is submitted that to maintain the sanctity of the above mandates as per Electricity Act-2003 and prevailing National Electricity Policy, the generators should also share the transmission charges corresponding to their sanctioned GNA quantum.

### **Validity of the Annexure 1 to the Draft Regulations in terms of deemed grant of GNA to the States as on the date of coming into force of the Regulations**

3. (i) Following is the stipulation at Regulation 18.1 of the Draft Regulations:

(a) *“GNA for a (i) State including intra-State entity(ies) and (ii) other drawee entities, shall be the average of “A” for the financial years 2018-19, 2019-20 and 2020-21:*

*where,*

*“A” = {0.5 X maximum ISTS drawal in a time block during the year} + {0.5 X [average of (maximum ISTS drawal in a time block in a day) during the year]}*

(b) *GNA computed as per clause (a) of this Regulation is given at Annexure-I to these regulations.*

(c) *GNA for a State including intra-State entity(ies) as per clause (b) of this Regulation shall be deemed to have been granted to STU of that State on behalf of such intra-State entities and shall remain valid until relinquished in accordance with these regulations.*

(d) *GNA deemed to have been granted to STU as per clause (c) of this Regulation, shall be published by the Nodal Agency within 30 days of notification of these regulations, as (i) GNA within the region and (ii) GNA from outside the region, in proportion to contracts, within the region or outside the region, under Long Term Access and Medium Term Open Access obtained in terms of the Connectivity Regulations.*

(e) *GNA deemed to have been granted to STU under clause(d) of this Regulation, shall be segregated for each intra-State entity, including distribution licensee, by the respective SLDC, and intimated to STU, Nodal Agency and NLDC within 1 month of publication of details by the Nodal Agency under clause (d) of this Regulation.”*

(ii) The above said formula cannot be said to be valid in terms of the said Regulations due to the fact that the maximum ISTS drawl during the financial years as per the formula and so also the average of the daily maximum ISTS drawls includes the short term access drawls in addition to the long term and medium term access drawls.

(iii) While Long term and Medium term open access drawls have been taken as GNA quantum in the said draft Regulations, the short term open access has been recognised as Temporary GNA (in short T-GNA), which is clear from the Explanatory Memorandum to the draft regulations, as reproduced hereunder:

***“T-GNA and National Open Access Registry (NOAR)***

14.1 ***T-GNA may be availed over and above the GNA and is a product akin to prevailing Short term Open Access. T-GNA is an open access provided to eligible buying entity for any duration from one time block and up to eleven months. Apart from catering to the need of short term customers, the proposed framework of T-GNA will also facilitate GNA grantees to balance their portfolio due to any eventuality or demand variability.***

14.2 ***T-GNA shall be granted over the available surplus capacity in ISTS after allocating the quantum for GNA. This proposal is similar to the prevailing practice under the Open Access Regulations, wherein short term open access (STOA) is granted subject to surplus capacity available after use by LTA and MTOA customers.”***

*“29.1. T-GNA shall be granted within the available transfer capability (ATC) on the ISTS after accounting for GNA of the GNA grantees.”*

4. From the above, it is clear that Temporary GNA is different from GNA. In other words, Temporary GNA cannot be included in the GNA of the State as on the date when the said Regulations would come into force, as the same would dilute the very concept of GNA and T-GNA as separate products, intended to deal with (LTA+MTOA) and STOA respectively.
5. In the Draft GNA Regulations, there is provision of even granting T-GNA for a single time block, which is presently of time duration of 15 minutes.
6. Therefore, if T-GNA erstwhile STOA would be considered for determination of GNA of the State as per above formula, the same would naturally enhance the GNA quantum of the State for temporary drawl of power for some time blocks even for a single time block, which would unnecessarily facilitate for capacity addition of ISTS at the cost of consumers.
7. Therefore, it is submitted that the deemed GNA quantum for a state as on the date of coming into force of the above Regulations should be fixed basing on the total drawl of the state excluding the short term drawl as per the above proposed formula of Regulation 18.1 (a) of the draft Regulations.

### **Impact on Sharing of Transmission Charges**

8. As per proposed Regulation 40.1 of draft regulations (payment of charges):

*“ 40.1. The transmission charges and losses for use of the inter-State transmission system shall be shared among buying entities of ISTS in accordance with the Sharing Regulations.”*

9. Whereas, Clause 6.3 of Explanatory Memorandum to above draft Regulations stipulates as under:

#### **6.3 “Payment of transmission charges under GNA**

*(f) The transmission charges shall be shared by the buying entities broadly in proportion to their GNA in terms of the Sharing Regulations.”*

10. In accordance with the above Clause, if the transmission charges would be shared among the DICs in proportion to their GNA, which inter-alia includes the short term open access quantum as on the date of coming effect of the said Regulations, the states like Odisha having such open access quantum would go on sharing higher Transmission charges as against such sharing on the basis of GNA, comprising of LTA and MTOA only. The said sharing of transmission charges on the basis of GNA (akin to LTA & MTOA) including T-GNA (akin to STOA) shall go against the concept of GNA and T-GNA as separate products as per above draft Regulations.

11. Therefore, in consonance with the concept of GNA and Temporary GNA (T-GNA) as separate products as per above Regulations, GNA for the state as on the date of coming into effect of these Regulations should be fixed on the basis of drawl of the state corresponding to the LTA and MTOA but excluding STOA, as proposed at Para-7 above and Annexure 1 of the draft Regulations may be revised accordingly.
12. Further, it is submitted that before publication of the above Regulations, it is imperative to have consultation with stakeholders on sharing Regulations to avoid mismatch between the above two and to have an appropriate and realistic mechanism for sharing of Inter State Transmission charges & losses among the entities and if required, sharing Regulations may be amended simultaneously.

### **Buying Entities not defined in draft Regulations**

13. In terms of draft Regulation 17.1 (ii) and 40.1, buying entities need to be defined for clarity on the same.

### **Un-utilised Capacity not to be passed to the Drawing Entities**

14. As per Clause 5.3.1 of National Electricity Policy and Clause 7.1 (4) of National Tariff Policy:  
“Prior agreement with the beneficiaries would not be a pre-condition for network expansion. CTU/STU should undertake network expansion after identifying the requirements in consonance with the National Electricity Plan and in consultation with stakeholders, and taking up execution after due regulatory approvals.”
15. In accordance with the above stipulation, if ISTS is developed for evacuation of power from the Generating Station, but no beneficiary is available to the Generator to avail such power, the question arises who would bear the cost of stranded ISTS, developed for the Generator.
16. The analysis done by Forum of regulators “ANALYSIS OF FACTORS IMPACTING RETAIL TARIFF AND MEASURES TO ADDRESS THEM” shows that the inter-State transmission system was designed for projected peak demand of 2,01,000 MW for FY 2019-20 whereas the actual peak demand for the same year turned out to be 1,84,000 MW. Actual energy requirement in FY 2019-20 was 1,290 BU as against the projection of 1,400 BU. Similar trends are seen in previous years as well. Demand not increasing as per projections is one of the reasons for higher per unit transmission charge.
17. In view of the above , when only buying entities are mandated to pay for the ISTS charges & the the ISTS is developed as a need to move towards a more market friendly approach in open access rather than undertaking construction of transmission system only if there is firm users requisition for such construction, no doubt the ISTS will be build up in commensurate with rolled

out plan of 500 GW target. The entire cost of such heavy ISTS infra cost developed for the Generator would be passed on to the buying entities irrespective their increase in demand (i.e. their use/ need ). Hence it is submitted that these stranded cost should be borne by the concerned Generator without passing on the same to the drawing entities and ultimately the consumers. Suitable mechanism for the same should be incorporated in the above Regulations.

### **Grant of Connectivity quantum to Generator to be Installed Capacity less Auxiliary Consumption**

18. As per the following proposed Regulation:

*“5.1. An Applicant, which is a generating station including REGS, shall apply for grant of Connectivity to the Nodal Agency for the quantum equal to the installed capacity of the generating station:”*

19. But maximum power which can be injected by the Generator to the ISTS shall be Installed capacity less Auxiliary consumption by the Generating Plant itself.
20. Therefore, to avoid unnecessary increase in the ISTS and cost implication of the same on the end consumers, maximum connectivity quantum to be granted for a Generator should be its installed capacity less its auxiliary consumption.

### **Payment liability to lie with the GNA Grantee using GNA of other Grantee**

21. Draft Regulation 23.1 stipulates as under:

*“23.1. An entity covered under Regulation 17.1 which is a GNA grantee, may authorise other entities covered under Regulation 17.1 which are GNA grantee(s), to use its GNA, in full or in part, with prior approval of the Nodal Agency, for a period not exceeding 1 (one) year at a time on mutually agreed terms and conditions:*

*Provided that payment liability for transmission charges shall continue to be with the original GNA grantee that authorised its GNA to be used by other GNA grantee(s):”*

22. When the original GNA grantee authorises another GNA grantee to use its GNA in full or in part with the approval of the Nodal Agency and the GNA quantum of original GNA grantee is reduced accordingly, there is no justification to continue the payment liability for such authorised quantum with the original GNA grantee, which should lie with the GNA grantee to whom the GNA is transferred.

### **Un-realistic Relinquishment charges for Drawing Entity**

23. Regulation 25.1 of draft GNA Regulations proposes inter-alia the following relinquishment charges for drawing entities:

*“25.1. For an entity covered under Regulation 17.1, GNA once granted can be relinquished, in full or in part, on payment of relinquishment charges in advance as per following:*

*(a) For an entity covered under clause (i) of Regulation 17.1 of these regulations, STU may relinquish GNA on behalf of identified intra-State entity. The relinquishment charges shall be equal to 60 times the transmission charges paid by such intra-State entity for the last billing month under the Sharing Regulations, corresponding to the relinquished quantum.”*

24. The relinquishment charges is un-realistic and un-justified taking the example of GRIDCO, which supposedly wishes to relinquish 200MW GNA out of its sanctioned GNA of 2000MW (say) and the transmission charges paid by it for the last billing month is Rs. 60 Crores (say), which means it has to pay a whopping amount of relinquishment charges to the tune of 360 Crores for relinquishment of only 10% of its sanctioned GNA.
25. In comparison, a Generator has to furnish maximum BG amount of Conn-BG 1 of Rs. 50 lakh, Conn-BG 2 for terminal bay as Rs.2 Crores to 12 Crores and Conn-BG3 of amount @ Rs. 2 lakh/MW towards allocation of surplus capacity in the existing ISTS as per proposed Regulation 8 of draft Regulations, which can at best be realised as relinquishment charges from the Generator.
26. Further, the quantum of relinquished GNA can be availed by short term open access entities qua the Temporary GNA (T-GNA) grantees as per above draft Regulations as the no. of such players in the Power Market has increased considerably in addition to the congestion/constraint in the ISTS corridors, thereby denying the transaction under short term access.
27. Therefore, it is submitted to the Hon’ble Commission to consider 10 % margin on the sanctioned GNA of an entity, which can be relinquished without imposition of any relinquishment charges subject to the condition that such relinquishment is in consumers’ interest. Beyond the above margin of 10 %, the relinquishment charges can be maximum 5 (five) times the transmission charges paid by such intra-State entity for the last billing month under the Sharing Regulations, corresponding to the relinquished quantum, which may be just, fair and reasonable.

### **Other intra-state entities to qualify for grant of T-GNA**

28. It is seen that other state entities like GRIDCO are not eligible as Applicants to apply for T-GNA as per following proposed regulation as per Draft GNA Regulations:

#### **26. “Eligibility for Temporary GNA**

**26.1.** *The following entities shall be eligible as Applicants to apply for T-GNA to ISTS:*

*(a) As buyers,*

*(i) Distribution licensee directly connected to ISTS;*



(ii) Bulk consumer directly connected to ISTS;

(iii) A buying entity connected to intra-State transmission system;

(iv) Generating station including Renewable Energy Generating Station for meeting its auxiliary consumption or start-up power or for meeting its supply obligations in terms of clause (3) of Regulation 6 of the Power Market Regulations;

(v) Captive generating plant;

(vi) Standalone ESS.”

29. However, as per following proposed Regulation, **other intra-State entities** are eligible as Applicants to apply for grant of GNA or for enhancement of the quantum of GNA:

**17. “Eligibility for GNA**

**17.1.** The following entities shall be eligible as Applicants to apply for grant of GNA or for enhancement of the quantum of GNA:

(i) State Transmission Utility on behalf of distribution licensees connected to intra-State transmission system and **other intra-State entities**;

.....”

30. In line with the above eligibility criteria for grant of GNA, the eligibility criteria for applicant for grant of T-GNA as per above proposed Regulation 26.1 should also include other intra-State entities like GRIDCO to avail T-GNA.

**Time for making application for GNA under Collective Transactions to be specified in GNA Regulations**

31. As per proposed Regulation 29.6 of Draft Regulations:

“29.6- T-GNA for collective transaction under real time market shall be processed within a time block.”

32. But the time for making application is not specified in the draft Regulations.

33. In this regard, Regulation 13 (B) of 6<sup>th</sup> Amendment to Open Access Regulations, 2008 stipulates hereunder:

“ 13 (B).....The window for trade in real time market for day (T) shall open from 22:45 hrs. to 23:00 hrs. of (T-1) for the delivery of power for the first two time blocks of 1<sup>st</sup> hour of the day (T) i.e. 00:00 hrs. to 00:30 hrs. and will be repeated every half an hour thereafter.....”

34. In line with the above, time for making application for T-GNA for collective transaction under real time market may be fixed in the GNA Regulations.

**Contradiction in Regulation 26.1 vis-à-vis Regulation 4.1 in terms of GNA and Connectivity:**

35. As per Regulation 26.1 of the draft GNA Regulations:

**27. “Eligibility for Temporary GNA**

**26.1.** *The following entities shall be eligible as Applicants to apply for T-GNA to ISTS:*

*(b) As buyers,*

*(i) Distribution licensee directly connected to ISTS;*  
.....

36. Clarification is required how a Distribution licensee would be connected directly to ISTS, when it is not eligible for connectivity with ISTS as per proposed Regulation 4.1 of the draft GNA Regulations.

**Contradiction in Regulation 17 of the Draft Regulations:**

37. Regulation 17 stipulates as under:

**18. “Eligibility for GNA**

**17.1.** *The following entities shall be eligible as Applicants to apply for grant of*

*GNA or for enhancement of the quantum of GNA:*

- (i) State Transmission Utility on behalf of distribution licensees connected to intra-State transmission system and other intra-State entities;*
- (ii) A buying entity connected to intra-State transmission system;*
- (iii) A distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly, with a load of 50 MW and above;*
- (iv) Trading licensees engaged in cross border trade of electricity in terms of the Cross Border Regulations;*
- (v) Transmission licensee connected to ISTS for drawal of auxiliary power.*

38. It is not clear whether the buying entity connected to intra-State transmission system as per above Regulation 17.1 (ii) shall come under purview of State Transmission Utility and if so, why the concerned State Transmission Utility cannot be an applicant on behalf of such buying entity, to apply for grant of GNA or for enhancement of the quantum of GNA instead of those entities applying independently.
39. It may also be clarified, whether a distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly, with a load of 50 MW and above as per proposed Regulation 17.1 (iii) would be

considered as a state drawing entity by SLDC or to be dealt by the concerned RLDC so far as the GNA Regulations are concerned.

### **Clarification required on Regulation 22.2 (d) with respect to Clause 11 of Explanatory Memorandum**

40. Regulation 22.2 (d) of Draft Regulations stipulates:

*“Entities covered under Regulation 4.1 and clause (iii) of Regulation 17.1 of these regulations shall furnish one-time GNA charge for Rs. one lakh per MW for the quantum of GNA one month prior to the start date of GNA. In case, such charges are not furnished by the entity within the specified timeline, the same shall be recovered by encashment of Conn-BG1, Conn-BG2 and Conn-BG3 as required. The proceeds of such one- time GNA charge shall be used for reducing Monthly Transmission Charges under the Sharing Regulations.”*

41. Whereas stipulation as per Clause 11 of the Explanatory Memorandum is given hereunder:

*“It has been proposed under Regulation 22.2(d) of the 2021 Draft GNA Regulations that entities covered under Regulations 4.1 and 17.1(iii) of the 2021 Draft GNA Regulations shall furnish one-time GNA charges @ Rs 1 lakh/MW one month prior to start date of GNA. **Such charges collected every month shall be used to reduce the transmission charges under the Sharing Regulations.**”*

42. It is seen that the stipulation of ‘**Such charges collected every month shall be used to reduce the transmission charges under the Sharing Regulations.**’ as per explanatory memorandum has not been reflected in above Regulation 22.2 (d) of the Draft Regulations, which requires clarification.

### **Regulations 25. Relinquishment of GNA:**

43. It is submitted that when sufficient Self generation comes up within State & subsequently the State will either surrender the PPA with ISGS/ outside Generating station or PPA with outside Generator expires, then it is understood from the draft Regulations that the GNA quantum of State won’t change until it is relinquished. In view of RE target of 500 GW till 2030, it is expected that significant RE integration is going to happen in most of the states which will play a dynamic role in Indian power sector. But the states have to pay a hefty amount towards such hindsight bias of ISTS drawl by fixing base GNA Ex ante basing on past 3 years peak drawl without any revision. In view of the above, it is requested to allow the states **to relinquish GNA without any burden of Relinquishment charge** in such scenario.

## **Standing Clearance for Grant of TGNA:**

44. In Clause 31.4 of the Draft CERC CGNA Regulations, 2021, it is stated that,

“The T-GNA Grantee to whom the Standing Clearance has been issued in terms of Regulation 31.2 or deemed to have been issued in terms of Regulation 31.3, shall bid in the power exchange(s) in such a manner that the aggregate quantum in each time block for all the bid(s) under bilateral transactions and collective transactions shall not exceed the quantum of Standing Clearance:

Provided that if the aggregate quantum of bid(s) in the power exchange(s) under bilateral transactions and collective transactions by a T-GNA grantee exceeds the quantum of the Standing Clearance in any time block, NLDC shall debar such T-GNA grantee from participating in bilateral and collective transactions for a period of seven (7) days under intimation to the concerned SLDC;

Provided further that the list of such T-GNA grantees debarred in terms of the above proviso shall be displayed on NOAR”

Further as per definition 2 (ap),

“(ap) “T-GNA Grantee” means a person which has been granted T-GNA under these regulations.”

Again as per Clause 26.1. (c),

“Power exchange for collective transactions or bilateral transactions on behalf of (i) buyer(s) covered under clause (a) of this Regulation, and (ii) trading licensee(s) engaged in cross border trade of electricity in terms of the Cross Border Regulations for injection into or drawal from the Indian grid.”

- (i) From the above, it may be inferred that T-GNA for Power Exchange transactions shall be granted only after the bid closure time and on filing of T-GNA application by Power Exchanges. Thus, prior to grant of T-GNA, a buyer/ seller participating in different platforms of Power Exchanges may not be T-GNA grantee for such transactions. Therefore, the term T-GNA grantee may be substituted with buyer/seller.
- (ii) Further, the provision for debarring the power exchange participants from participating in bilateral and collective transaction for period of seven (7) days, in the event the aggregate quantum of bid(s) of such participants in the power exchange(s) under bilateral transactions and collective transactions exceeds its quantum of the Standing Clearance in any time block, seems to be very extreme. Such debar shall not only negatively affect the performance of utilities but also shall adversely impact the consumers of the same. Thus, instead of debarring such participants, the bids of such participants may be curtailed while allocating T-GNA.

Further, warning messages may be provided by the Power Exchanges when a participant's bid exceeds its respective standing clearance.

**No stipulation on additional charges on over Injection by Generators:**

45. Clause No. 2 (C) of Explanatory Memorandum stipulates for imposition of additional charges on drawing Entities towards drawal beyond Sanctioned GNA but there is no such provision either in the Explanatory Memorandum or in the draft GNA Regulations for over-injection by Generators beyond their sanctioned connectivity quantum.

**Liabilities for Transmission Charges not to be passed to beneficiaries in case of delay or failure in achieving CoD of concerned Generators:**

46. Clause No. 6.3(e) of Explanatory Memorandum may be modified in the following manner.

"Sufficient safeguards have been provided in the 2021 Draft GNA Regulations so that consumers do not get burdened with additional liabilities of transmission charges of the ATS identified with a particular generator which fails to achieve CoD of its Generating Stations, either in full or in part irrespective of any reason whatsoever, for delay/failure in achieving CoD.

**Clarification on Serving of Transmission Charges Bills:**

47. It may be clarified in the GNA Regulations, whether the Transmission Charges Bills would be served on STU or State entities individually.
48. GRIDCO may be allowed to make further submissions, if any, on the above Regulations at the time of Public Hearing.