



HPX/CERC/02/25022

Dated:  
25.02.2022

To,

Central Electricity Regulatory Commission (CERC),  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building,  
36, Janpath, New Delhi- 110001

**Sub: Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State transmission system and other related matters) Regulations, 2021.**

Dear Sir/Madam,

With reference to the public notice issued by the commission dated 16<sup>th</sup> Dec 2021 (No. L-1/261/2021/CERC), Hindustan Power Exchange (HPX) supports this initiative by the Central Electricity Regulatory Commission (CERC) to adopt General Network Access (GNA) based approach in accessing the inter-State Transmission System (ISTS). In view of the same, please find enclosed herewith the comments/ suggestions/ objections on the CERC (Connectivity and General Network Access to the inter-State transmission system and other related matters) Regulations, 2021 by Hindustan Power Exchange (HPX).

Thanking You,

Yours sincerely,

For Hindustan Power Exchange

**Akhilesh Awasthy**  
Chief Operating Officer

**Enclosed: Comments (Annexure A)**

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**Hindustan Power Exchange Limited**

(Formerly known as Pranurja Solutions Ltd)

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CIN: U74999MH2018PLC308448



## Annexure A

### Comments on the draft “The Central Electricity Regulatory Commission (Connectivity and General Network Access to the Inter-State Transmission System) Regulations 2021

#### Introduction

The draft regulations have tried to address the major transmission issues and challenges which shall bring in radical change to the country’s power disbursement system and thereby create a level playing field once implemented. With an ambitious target of 500GW renewable energy capacity by 2030, it is therefore paramount to develop the country’s transmission network given that renewable energy projects have a shorter gestation period and an increasing number of players in the power sector will certainly pose new challenges in the development of optimum transmission infrastructure. The current draft regulations provide a concrete framework for developing the transmission network in the country with an eye for the future.

Considering the teachings and skills developed over the years, the necessity of the hour is clearly in favor of adopting an optimized/techno-economic possible approach in planning the transmission network to a level, that permits evacuation to all or any of the generators and additionally facilitates the development of the ability market.

The draft regulations will also empower state power distribution and transmission companies to determine their transmission requirements and develop them accordingly. Also, states will be able to purchase electricity from short-term and medium-term contracts and provide them

Additionally, there are some issues that require elaboration and more specifics so that inadvertent omissions are also addressed. Some key issues that we wish to highlight are the following:

Our comments with reference to specific clauses are related to some clarifications needed to dispel any ambiguity/uncertainty and are mentioned below:

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Sl. No	Clause No.	Draft Regulation	Remarks
1	18.1 (a)	On the date, these regulations come into force, (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,  $A = \{0.5 \times \text{maximum ISTS drawl in a time block during the year}\} + \{0.5 \times \text{[average of (maximum ISTS drawl in a time block in a day) during the year]}\}$	Will GNA/T-GNA be granted to states for sale of power on exchange having free power share from Hydro power stations. Kindly clarify the treatment in case such Hydro station are CTU connected then ideally States are procuring the same before selling.
	18.1 (b)	(b) GNA computed as per clause (a) of this Regulation is given at Annexure-I to these regulations.	
2	26.1 (c)	The following entities shall be eligible as Applicants to apply for T-GNA to ISTS:  (c) Power exchanges 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 drawl from the Indian grid.	Clause (3) of regulation 6 of the power market regulations:-  In the event of a forced outage of a generating station or unit thereof, or any other event as may be notified by the Commission, wherein the obligation of the generating station to supply electricity continues under an existing contract, such generating station may fulfill its obligation under the said contract by entering into a

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34.2	Transmission charges for T-GNA, in case of bilateral and collective transactions, shall be payable only at point of drawl, as per the last published Transmission charge rate for T-GNA for the State where such point of drawl is located: Provided that under collective transactions, transmission charges for T-GNA shall be payable for drawl schedules more than GNA quantum or T-GNA quantum or both, as applicable.	contract(s) covered under clause (1) or (2) or (3) of Regulation 5 of these regulations.  <i>1. in case of RTM buy of a generating station, does generating station need to apply for T-GNA or T-GNA will be deemed approved for generating station.</i> Does generating station need to pay ISTS transmission charges for drawl quantity.
3	28.5 (a) (iii)  a) Advance application category: (iii) End time of T-GNA in terms of time-block and date;  In case the seller is an intra-State entity and the point of injection is available, Standing Clearance of SLDC under whose jurisdiction the point of injection is located: 28.5 (a) (vii) Provided that in case the point of injection and corresponding Standing Clearance of SLDC under whose jurisdiction the point of injection is located is not available at the time of making the application, the same shall be submitted along with the scheduling request in terms of Regulation 33 of these regulations; In case the seller is a regional entity and the point of injection is not available at the time of making the application, the point of injection	In a T-GNA Advance application there is no limit to the end date for which the t-GNA is to be applied. It means any applicant can file an advance application for 11 months in one go. However, as per present regulations, standing clearance cannot be issued for more than three months.  Clarification required where point of injection need to be changed in case of alternate arrangement of supply after grant of T-GNA.

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		Provided further that the list of such T-GNA grantees debarred in terms of the above proviso shall be displayed on NOAR.	
6	34.4 (b)	<p>Payment of transmission charges for T-GNA:</p> <p>(b) Transmission charges for T-GNA under Exigency application category shall be deposited along with the application. In case the Exigency application is approved for part of the applied quantum or part of the applied period or is rejected, the corresponding transmission charges shall be returned by the next day from the date of approval:</p> <p>Provided that the applicant may opt for keeping the excess transmission charges with the Nodal Agency to be adjusted against future T-GNA applications.</p>	<p>Clarification required on payment of transmission charges when the day of Exigency application is a bank holiday.</p>
	34.4(c)	<p>(c) Under collective transactions, the power exchange shall deposit the transmission charges for T-GNA with the Nodal Agency by the 2400 hrs of (D+2) day, (D) being the day of application for grant of T-GNA:</p> <p>Provided that the transmission charges for T-GNA for use of intra-State transmission system shall be settled directly by the power exchange with respective State Load Dispatch Centre.</p>	<p>Clarification required in case both "D+1" and "D+2" is bank holiday.</p>
	34.4(d)	<p>(d) In case any scheduling request under T-GNA is not approved by RLDC on day ahead basis or curtailed for the reasons of transmission constraints or grid security, the transmission charges for such quantum not scheduled or curtailed shall be refunded to the T-GNA grantee</p>	<p>No timeline has been specified for a refund of transmission charges by the nodal agency.</p>

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		shall be submitted along with the scheduling request in terms of Regulation 33 of these regulations.	
4	28.6 (a)	Application for grant of T-GNA, under bilateral transactions, shall contain the following declarations by the Applicant:  (a) That necessary infrastructure for time-block wise metering and accounting in accordance with the provisions of the Grid code and appropriate communication system in accordance with the provisions of the Communication Regulations are in place for the point of drawl and point of injection, if available.	Availability of the infrastructure for time block wise metering and appropriate communication system should be the responsibility of SLDC / RLDC who is providing the standing clearance, or the grid connected entities. Power Exchange as an applicant has no way to verify and hence, they cannot declare the same. So, this clause may be modified to exclude Power Exchange.
5	31.4	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;	As per current procedure of bilateral transactions, where drawee entity provides SLDC Concurrence after trade executed on TAM/GTAM segment of power exchange, there should be a kind of provision for entity to apply for T-GNA under exigency situation.  Clarification required on the same.

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