



Abhishek Rohilla <cerc.abhishek@gmail.com>

Fwd: Comments on the Draft Connectivity and GNA Guidelines

1 message

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

20 February 2022 at 11:54

Regards,
Abhishek Rohilla
Dy. Chief (Engg.)
Central Electricity Regulatory Commission
3rd Floor, Chanderlok Building,
36, Janpath, New Delhi-110001

Mb. 9643439120

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

From: "Shilpa Agarwal" <shilpa@cercind.gov.in>
To: "Ratnesh Kumar" <ratnesh.cea@gov.in>, "Abhishek Rohilla" <abhishek.rohilla@gov.in>
Sent: Tuesday, February 15, 2022 4:57:13 PM
Subject: Fwd: Comments on the Draft Connectivity and GNA Guidelines

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

From: rajesh@ptcindia.com
To: Sanoj Kumar Jha <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>
Cc: varun@ptcindia.com, rajiv mishra <rajiv.mishra@ptcindia.com>
Sent: Tue, 15 Feb 2022 16:33:57 +0530 (IST)
Subject: Comments on the Draft Connectivity and GNA Guidelines

Ref: PTC/GNA/478

Date: February 15, 2022

To
Shri. Sanoj Kumar Jha
The Secretary
Central Electricity Regulatory Commission
3 rd & 4th Floor, Chanderlok Building,
36, Janpath, New Delhi-110001

Sub: PTC's Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021

Dear Sir

This is with reference to the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

We at PTC India Limited support this initiative by the CERC to ask the market participants to adopt a General Network Access (GNA) based approach to access the inter-State Transmission System (ISTS).

We understand that once these draft regulations come into force, the Open Access Regulations (Grant of connectivity, LTA and MTOA Regulation 2009 dated 31-12-2009, Grant of connectivity based on RE sources dated 15-05-18 and 20-02-21, Regulations for STOA for bilateral transactions dated 30-06-11, Regulation for STOA for collective transactions dated. 30-06-11) will be repealed.

It is requested that the principle of equity in terms of the current situation of market participants under the prevailing regime be followed during and post transition to the new "GNA" regime. To clarify, all rights and obligations as well as the priorities established under the prevailing connectivity and open access regulations should be maintained post the transition.

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

a. Trading Licensees are not eligible to apply for GNA on behalf of a buying utility for domestic power, but they are allowed to do the same for cross-border transactions as well as for t-GNA. It has also been specified that LTA which has not become effective to a trading licensee shall be treated as withdrawn once these regulations come into effect. We believe that traders are an essential market participant who act as aggregators and correct market distortions. Therefore, they must be allowed to apply for GNA on behalf of a buying utility for all kinds of power procurement.

b. An energy storage system (ESS) can take the lead for aggregating generator capacity and apply for a 50 MW ISTS connectivity. Trading Licensees being aggregators may also be allowed to apply for the same on behalf of a group of generators and/or ESS aggregating to 50 MW and above.

c. Also, the current guidelines allow the Buying entities to principally apply for GNA, therefore any issues pertaining to open access related disputes under the erstwhile regulations (including issues related to relinquishment charges) may be made equitable so that the participants under the erstwhile regulations are not worse off as compared to the proposed regulations.


Our detailed comments on the petition are enclosed herewith for your kind reference and perusal.

You are requested to kindly consider favorably consider the enclosed comments.

Thanking you,

Rajesh Cherayil
Chief Strategy Officer

2 attachments

 **Letter to CERC on draft GNA Guidelines.pdf**
1054K

 **Comments on Connectivity_GNA_submission.pdf**
145K



Ref: PTC/GNA/478

Date: February 15, 2022

To
Shri. Sanoj Kumar Jha
The Secretary
Central Electricity Regulatory Commission
3 rd & 4th Floor, Chanderlok Building,
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We at PTC India Limited support this initiative by the CERC to ask the market participants to adopt a General Network Access (GNA) based approach to access the inter-State Transmission System (ISTS).

We understand that once these draft regulations come into force, the Open Access Regulations (Grant of connectivity, LTA and MTOA Regulation 2009 dated 31-12-2009, Grant of connectivity based on RE sources dated 15-05-18 and 20-02-21, Regulations for STOA for bilateral transactions dated 30-06-11, Regulation for STOA for collective transactions dated. 30-06-11) will be repealed.

It is requested that the principle of equity in terms of the current situation of market participants under the prevailing regime be followed during and post transition to the new "GNA" regime. To clarify, all rights and obligations as well as the priorities established under the prevailing connectivity and open access regulations should be maintained post the transition.

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

- a. Trading Licensees are not eligible to apply for GNA on behalf of a buying utility for domestic power, but they are allowed to do the same for cross-border transactions as well as for t-GNA. It has also been specified that LTA which has not become effective to a trading licensee shall be treated as withdrawn once these regulations come into effect. We believe that traders are an essential market participant who act as aggregators and correct market distortions. Therefore, they must be allowed to apply for GNA on behalf of a buying utility for all kinds of power procurement.
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- c. Also, the current guidelines allow the Buying entities to principally apply for GNA, therefore any issues pertaining to open access related disputes under the erstwhile regulations (including issues

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related to relinquishment charges) may be made equitable so that the participants under the erstwhile regulations are not worse off as compared to the proposed regulations.

Our detailed comments on the petition are enclosed herewith for your kind reference and perusal.

You are requested to kindly consider favorably consider the enclosed comments.

Thanking you,

Yours faithfully,
For **PTC India Ltd.**

(Rajesh Cherayil)
Chief Strategy Officer

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

1. **General Comments:** PTC supports this initiative by the Central Electricity Regulatory Commission (CERC) to ask the market participants to adopt a General Network Access (GNA) based approach to accessing the inter-State Transmission System (ISTS). Given that once these draft regulations come into force, the open access regulations (Grant of connectivity, LTA and MTOA Regulation 2009 dated 31-12-2009, Grant of connectivity based on RE sources dated 15-05-18 and 20-02-21, Regulation for STOA for bilateral transactions dated 30-06-11, Regulation for STOA for collective transactions dated. 30-06-11) will be repealed, we urge that the principle of equity in terms of the current situation of market participants under the prevailing regime be followed during and post transition to the new “GNA” regime. To clarify, all rights and obligations as well as the priorities established under the prevailing connectivity and open access regulations should be maintained post the transition. Additionally, there are some issues which require elaboration and more specifics so that inadvertent omissions are also addressed. Some key issues that we wish to highlight are the following.
 - a. Trading Licensees are not eligible to apply for GNA on behalf of a buying utility for domestic power, but they are allowed to do the same for cross-border transactions as well as for t-GNA. It has also been specified that LTA which has not become effective to a trading licensee shall be treated as withdrawn once these regulations come into effect. We believe that traders are an essential market participant who act as aggregators and correct market distortions. Therefore, they must be allowed to apply for GNA on behalf of a buying utility for all kinds of power procurement.
 - b. An energy storage system (ESS) can take the lead for aggregating generator capacity and apply for a 50 MW ISTS connectivity. Trading Licensees being aggregators may also be allowed to apply for the same on behalf of a group of generators and/or ESS aggregating to 50 MW and above.

- c. Also, the current guidelines allow the Buying entities to principally apply for GNA. Therefore any issues pertaining to open access related disputes under the erstwhile regulations (including issues related to relinquishment charges) may be made equitable so that the participants under the erstwhile regulations are not worse off as compared to the proposed regulations.
- 2. Our comments with reference to specific clauses are related to some clarifications needed to dispel any ambiguity/uncertainty and enclosed at Annexure-A

Annexure-A

Clause No.	Remarks
3.2 & 3.3	CERC has allowed connectivity to ISTS and GNA for an aggregate capacity with a minimum threshold starting from 50 MW. However, the application fee has been kept flat at 5 INR lakhs irrespective of the capacity beyond 50 MW. We propose that a slab-wise structure linked with MW capacity be applied as per present regulations to levy the application fee and the maximum fee be applied to the highest capacity as per the slab.
3.5 & 3.6	We believe that for abundant clarity, since the principle adopted is first-come first-served, it may be clarified if the deficiency in any application is rectified by the applicant within the stipulated time of one week (which falls in next month of application) , whether the application date would be considered as per the original application date or the date when the application is rectified. Additionally, it is unclear how the priority will be decided in case of connectivity to the same interconnection point if one application needs associated transmission system (ATS) and the other does not require any ATS.
4.1.(a) & (c)	Lead generator or lead ESS can apply for inter-connection to ISTS with an aggregate installed capacity of 50 MW. If one of the generators subsequently withdraws the application and the aggregated quantum become lesser than 50 MW, will the charges be borne after re-allocation to the other members in the group or will there be an automatic surrender of the connectivity due to the minimum threshold capacity being breached?
4.1.(d)	It is stipulated that state government approved Renewable Power Park Developers are also eligible for ISTS connectivity. However, there is no MW threshold specified for such a Renewable Power Park Developer. This seems like an inadvertent omission and may be clarified.
4.3	This clause needs to be clarified further as it is not understood why a generator either connected to or intending to connect to the intra state transmission system will seek connectivity from the central transmission utility (CTU)? is it for some residual capacity? In that case is there any minimum MW threshold? Does it also require unit wise bifurcation to connect in STU and CTU?
5.5	If a Renewable Power Park Developer applies for an approved quantum of connectivity and later it is unable to get all the developers to set up capacity (aggregating to the capacity of the

	park), the system costing will increase for designing the infrastructure. Is it envisaged that the Renewable Power Park Developer will bear the risks and obligations for such increased system costs?
8.3 (c)	In case of excessive delay for connectivity or non-intimation by the nodal agency (the applicant is not at fault), the applicant is compelled to withdraw the application, they should get back the application fees in addition to Conn-BG1 as they may have to apply again for connectivity.
10.5	It is stipulated that final coordinates for a proposed ISTS sub-station shall not be outside the radius of 5 km of the tentative coordinates. That is a large radius and may result in longer tie-line connectivity to the sub-station. Therefore, this radius of 5km may be re-looked and reduced.
10.6	In case of failure to sign the connectivity agreement where no construction of ATS and terminal bays has been awarded for implementation, Conn –BG2 shall be returned. The clause is silent on returning Conn –BG1 and Conn-BG3. We propose that it should be clarified that in such a situation, Conn – BG1 should also be returned simultaneously (as in the case of declaration of commercial operation of a connectivity grantee clause 16.1). Similarly, If Conn – BG3 was applicable and received, it should also be returned.
17 (ii)	An intra state buying entity who is connected to STU will opt for an ISTS GNA when they want to purchase power from outside the state. The minimum threshold capacity (MW) should be specified in such a case.
17 (iv)	Trading Licensees should also be eligible to apply for GNA on behalf of a buying utility for domestic power when they are allowed for the cross-border transactions and for t-GNA.
23	The procedure to schedule power by other GNA grantee referenced under this clause needs to be detailed especially if either the point of injection or point of drawl is different.
28.5 (a) (iii)	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. Additionally, as per the National Open Access Registry (NOAR) software application, the start date and end date should be within the month only. Therefore, applicants must file 11 application for 11 months. So, these regulations may need to be dovetailed with the processes/ software or vice-versa.
28.5 (a) (iv),	As per NOAR software there is no provision for uploading SLDC standing clearance. As per NOAR, standing clearance w.r.t. point of drawl or point of injection is already provided by SLDC

(vi), (vii)	to NOAR.As per NOAR there is no provision for injecting region as it specifies the point of injection. These regulations need to sync with the procedures that need to be adopted.
28.6 (a)	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. Trader as an applicant has no way to verify and hence they cannot declare the same. So, this clause may e modified to exclude trading licensees.
29.3 & 29.4	Considering the huge number of t-GNA applications in both the Advance and Exigency category, the processing criteria may be more detailed considering that more than one application can be filed at the same time (matched with seconds).
31.4	<p>NOAR is developed in such a way that application / bid will automatically be rejected if it is more than the standing clearance. Hence if t-GNA grantee places bids more than the standing clearance by mistake it will not be proper to debar that t-GNA grantee for next 7 days when power is not scheduled. This will compound the penalty to the t-GNA grantee.</p> <p>If a t-GNA grantee is debarred for a period of 7 days, the regulations need to clearly specify the treatment of the applicant (Specially when the applicant is a trader) as a t-GNA grantee may apply different quantum with different traders as an applicant?</p> <p>In case a t-GNA grantee is debarred for a period of 7 days will the already approved T-GNA of the same T-GNA grantee lapse and count as being surrendered? Please clarify.</p>
32.1 & 32.2	If t-GNA under advance category cannot be revised for the application period not exceeding one month, this may create the scenario of an unutilized corridor as well as blocking of standing clearance quantum. Advance t-GNA approval may be considered for revision by giving 3 days' notice. Penal charges may also be reviewed accordingly.
34.4 (a)	As a practical measure, the t-GNA grantee under advance category may be allowed to deposit the transmission charges within first working day of start of flow of power as there may be consecutive holidays before the start of flow of power.
34.4 (b)	There is a practical issue in terms of depositing transmission charges under exigency category along with the application. Because there is a chance that application under exigency category will be filed beyond normal banking hours. Hence it is proposed to deposit the transmission charges within one working day from the start of power flow.
34.4 (d)	No timeline has been specified for refund of transmission charges by the nodal agency.
34.6	As a principle of equity, in case of delay in refund by the nodal agency beyond stipulated time, no penal interest has been specified.

36.1	In case of a constraint in the transmission system, the GNA grantee should schedule allocated corridor in proportion to their contract subject to availability of power otherwise dispute may occur in the contract for procurement of power.
34	It is proposed that NLDC / RLDC / SLDC scheduling charges shall be paid by the GNA grantees as per the applicable Regulations. However, these have not been specified in these regulations. This needs to be clarified.
37.1	In case an Applicant want to convert the old application, the issue of priority to be maintained or conversion resulting in a loss of priority should be clearly specified.