



West Bengal State Electricity Distribution Company Limited
(A Government of West Bengal Enterprise)

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Regulation Cell

Memo No-REG/Legal/CERC/ 54

Dated: 15/02/2022

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

Sub: Comments on draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

Ref: Memo No. L-1/261/2021/CERC Dated: 14th January, 2022 of Secretary CERC.

Respected Sir,

With reference to the above, comments/ suggestions of WBSEDCL are enclosed herewith for your consideration, please.

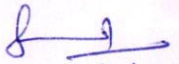
Encl: As above

Yours faithfully,

(S. Mukhopadhyay)
Chief Engineer (Reg)

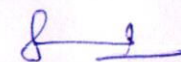
Observation of WBSEDCL on draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021

| Clause No. | As per Draft Regulation | Amendment proposed | Reason |
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| 17.1 (ii) & (iii) | (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; | (ii) A buying entity connected to intra-State transmission system <u>for the quantum and period having Transmission Service Agreement (TSA) with STU;</u> (iii) A distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly, with a load of 50 MW and above <u>subject to having TSA with STU for the same quantum & period;</u> | Optimum use of STU network and realization of STU charge, proper state transmission system planning commensurate with applied GNA. |
| 18.1 (a) | (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) GNA for a (i) State including intra-State entity(ies) and (ii) other drawee entities, shall be the average of "A" for <u>preceding 03 (three) the financial years before the FY of the implementation of this Regulation 2018- 19, 2019-20 and 2020-21 and revised each year for subsequent year on the basis of last three FYs: where,...</u> | To keep the GNA dynamic and adjustment on yearly basis and it will also help in the transmission planning. |
| 18.1 (e) | (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 | (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 | To ensure applicability of GNA to each interstate entity by SLDC. After implementation of GNA, State as a whole will be the beneficiary of CTU as the GNA quantum will be derived on the basis of the |


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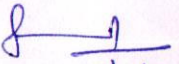
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| | <p>details by the Nodal Agency under clause (d) of this Regulation.</p> <p>Provided that in case an SLDC fails to provide such segregation, the pro rata GNA shall be allocated to each intra-State entity in the ratio of their Long Term Access and Medium Term Open Access, as included in the first bill raised in the previous month under the Sharing Regulations.</p> | <p>Agency under clause (d) of this Regulation.</p> <p>Provided that in case an SLDC fails to provide such segregation, the pro rata GNA shall be allocated to each intra-State entity in the ratio of their Long Term Access and Medium Term Open Access, as included in the first bill raised in the previous month under the Sharing Regulations. The monthly transmission charge bill will be claimed from STU being deemed GNA grantee. Based on the segregation done by SLDC, STU will collect the monthly transmission charge from the intra state entities and disburse the same to CTU.</p> | <p>drawl of the state as a whole for which erstwhile DIC Discom(s) is/are not only responsible. The overall drawl of the state also contributed by other non DIC Discoms if any, OA Customers etc. . Hence, state GNA charge should not be claimed /imposed on the erstwhile DIC Discoms.</p> |
| 19.2 | <p>STU, on behalf of intra-State entities including distribution licensees, may apply, once in a financial year (starting from the financial year following the financial year in which these regulations have become effective) by the month of September each year, for additional GNA for the next 3 (three) financial years, with entity-wise segregation indicating GNA within the region and from outside the region, as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: Provided that such additional GNA quantum to be added in each of the next three financial years shall</p> | <p>STU, on behalf of intra-State entities including distribution licensees, may apply, once in a financial year (starting from the financial year following the financial year in which these regulations have become effective) by the month of September each year, for additional GNA for the next 3 (three) financial years <u>indicating year wise additional GNA requirement of each entities</u>, with entity-wise segregation indicating GNA within the region and from outside the region, as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: Provided that such additional GNA quantum to be added in each of the next three financial years shall be</p> | <p>To accommodate PPA tenure of less than 03 years for avoiding unnecessary burden on end consumers.</p> |


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| | be applicable from a specified date of the respective financial year. | applicable from a specified date of the respective financial year. | |
| 25.1 (a) | (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. | (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 average transmission charge for <u>36 months or up to the date of re-allotment of GNA, whichever is earlier</u> 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. | To avoid double charging in case of reallocation of GNA as well as reducing the financial burden on the consumers. |
| 32.1 | T-GNA granted under Exigency application category or under Advance application category for a period not exceeding one month cannot be revised. | T-GNA granted under Exigency application category or under Advance application category for a period not exceeding <u>02 (two) days</u> one month cannot be revised. | As per existing Regulation and also to reduce burden of end users. |
| 32.2 | T-GNA granted under Advance application category for a period of more than one month may be reduced for the balance period with a prior notice of one (1) month by the T-GNA grantee: Provided that applicable T-GNA charges for the quantum of T-GNA granted shall be payable for the notice period of one (1) month. | T-GNA granted under Advance application category for a period of more than one month may be reduced for the balance period with a prior notice of <u>03 (three) days</u> one (1) month by the T-GNA grantee: Provided that applicable T-GNA charges for the quantum of T-GNA granted shall be payable for the notice period of <u>02 (two) days beyond the notice period.</u> one (1) month. | As per existing Short Term Open Access Regulation and also to reduce burden of end users. |


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