

TAMIL NADU POWER DISTRIBUTION CORPORATION LTD

From

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To

The Secretary,
Central Electricity Regulatory Commission,
7th Floor, Tower B, World Trade Centre,
Nauroji Nagar,
New Delhi-110029.

Lr. No. CFC/RC/SE/CERC/EE1/AEE1/ F. CERC /D . 90/25 dt: 3.04.2025

Sir,

Sub: CERC – Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) (Fourth Amendment) Regulations, 2025 - Submission of comments and views of **TNPDC**L – Regarding.

Ref: (i)CERC's notification No. L-1/261/ 2021/ CERC dated: 03rd March 2025
(ii)CERC's notification No. L-1/261/2021/CERC Dated: 12th March 2025

Adverting to the above references, the comments and views of TNPDC (TANGEDCO) on the proposed amendment to the GNA Regulations are furnished below:

1. The proposal to separate connectivity into solar-hour connectivity and non-solar hour connectivity is a welcome step.
2. Necessary amendment may be made in Regulation 19.2 so as to facilitate the STUs and Distribution licensees apply for additional GNA on par with new applicants, as and when it is required.
3. If the connectivity granted to a renewable power park is revoked, then Land BG if any shall be revoked in addition to levying Relinquishment charges on par with the GNA grantee.

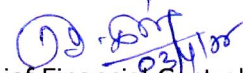
It is also requested that, State owned distribution licencees shall be made eligible for directly applying to CTUIL for GNA and necessary provision for the same may be incorporated under Regulation 17.1 of Principal Regulations. Further, it is requested to update the GNA quantum for Tamil Nadu based on the current ISTS drawl by excluding the quantum drawn through Intra – state network from CGS.

The detailed comments and suggestions of TNPCL in this context are submitted in the annexure enclosed. It is requested that the observations /comments and suggestions of TANGEDCO may kindly be taken into consideration while finalizing the Regulations.

Thanking you,

Encl.: Annexure

Yours faithfully,



Chief Financial Controller
Regulatory Cell

Annexure

Comments of TANGEDCO on the draft Fourth Amendment to Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State transmission System) Regulations, 2025:

S. NO	Draft 4th Amendment	TNPDCL COMMENTS
1	<p>New Regulation 5.11</p> <p>A new Regulation 5.11 shall be added after Regulation 5.10 of the Principal Regulations, as under:</p> <p>"5.11 Entities with Restricted Access</p> <p>(a) An REGS (with or without ESS) based on Wind source or ESS may seek Connectivity with restricted access (non-solar hours) at a terminal bay of an ISTS substation: (i) Through a separate dedicated transmission system, or (ii) Which is already allocated to another REGS or Renewable Power Park, with restricted access (solar hours),</p> <p>(b) The In principle or final grant of Connectivity intimated to an REGS (with or without ESS) based on solar source or an RHGS with a combination of solar source with another source including ESS (including cases where GNA is effective) shall be converted as an entity with restricted access (corresponding to non-solar capacity during non-solar hours) within a period of one week after the expiry of three months from date of effectiveness of this Regulation:</p> <p>Provided that while converting to restricted access, the Nodal Agency shall consider the application which such an entity may make for additional capacity under this Regulation 5.2 or Regulation 5.11(a) of these regulations, within a period of three months from effectiveness of this Regulation:</p>	<p>The proposal to separate connectivity into solar-hour connectivity and non-solar hour connectivity is a welcome and innovative step. It optimizes grid resources, boosts renewable energy (RE) penetration, and reduces overall transmission costs.</p>

	<p>Provided further that if the quantum of Connectivity that can be made available for non-solar hours is less than 50 MW, such RES or RHGS shall not be considered for conversion as an entity with restricted access.</p>	
2.	<p>Amendment to Regulation 19.2 of the Principal Regulations:</p> <p>The Proviso to Regulation 19.2 of the Principal Regulation shall be substituted as under: "Provided that such additional GNA quantum to be added in each of the next three financial years shall be applicable from a specified date(s) of the respective financial year subject to a maximum four dates for a year "</p>	<p>The proposed amendment to Regulation 19.2 deals with additional GNA with multiple start dates. Though the State Discoms are carrying out Resource adequacy Plan annually, it is always subject to revisions / modifications based on the delay in commissioning of generation projects, new open access customers to STU, requiring additional GNA. Hence, there is a necessity for additional GNA as and when required. The CTU is carrying out transmission planning studies on continuous basis, based on the new connectivity / GNA applications.</p> <p>The approval process through CMETS and RPC are carried out regularly on monthly / quarterly basis respectively.</p> <p>Under these circumstances, processing the additional GNA applications on par with new GNA applications would facilitate the State utilities to avail the margin if any available in the system as and when required. Further, under exigency conditions this would provide necessary support. In view of the above, the Hon'ble Commission may issue suitable amendment to the regulations so as to facilitate the STUs and Distribution licensees apply for additional GNA on par with new applicants.</p>
3.	<p>Amendment to Regulation 24.6 of the Principal Regulations:</p> <p>Sub-clause (d) of Clause (1)) of Regulation 24.6 of the Principal Regulations (except sub-clauses(i) and (ii) shall be substituted as under:</p> <p>"(d) Connectivity granted to a Renewable Power Park developer shall be revoked for the corresponding capacity, if the Connectivity and corresponding GNA has been made effective in terms of Clause (a) of Regulation 22.4 of these regulations and</p>	<p>TNPDCCL would reiterate the views on the draft third amendment notified by the Hon'ble Commission that are relevant to this proposed amendment:</p> <p>1. <u>Treatment of Land BG in case of relinquishment of Connectivity:</u></p> <p>For the applicants covered under Land BG route, the risk for the abandonment of the projects is more. Hence, the Con BG1 & BG2 specified in the regulation 24.3 for relinquishment might not provide sufficient financial security for the costs incurred due to the creation of associated</p>

	<p>generating station(s) within the Power park fails to achieve COD on or before, "</p>	<p>transmission system and the common transmission system.</p> <p>2. The entire capital investment made on the transmission system will put into the pool and the discoms will be burdened with the unwarranted financial liability.</p> <p>3.The definition of 'ATS' has already relieved the Connectivity grantees from the liability of compensating the huge investment made for the common transmission system developed for the evacuation and transfer of power by the generators.</p> <p>4.Hence, for the applicants covered under Land BG route, irrespective of the time period of relinquishment after final grant of Connectivity, 100% of Land BG shall be encashed and this regulation 24.3A shall be modified as below: A new Regulation, namely, Regulation 24.3A, shall be added after Regulation 24.3 of the Principal Regulations as under:</p> <p><i>"24.3A For Connectivity Grantees covered under sub-clause (c) of Clause (vii) or sub-clause (c) of Clause (xi) of Regulation 5.8 of these regulations: If the Connectivity is relinquished after the final grant of Connectivity, 100% of the subsisting Bank Guarantee submitted under sub clause (c) of Clause (vii) or sub-clause (c) of Clause (xi) of Regulation 5.8 of these regulations, shall be encashed, irrespective of the time line of relinquishment of the connectivity. In addition, Relinquishment charges shall be made applicable to the connectivity grantee in line with the GNA grantee detailed under Regulation 25."</i></p> <p>Further, in the similar lines, if the connectivity granted to a renewable power park is revoked partially or fully, then Land BG if any shall be revoked in addition to levying Relinquishment charges on par with the GNA grantee detailed under Regulation 25.</p>
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	Additional Submissions: TNPDCCL has been consistently raising certain discrepancies in GNA Regulations before the Hon'ble Commission seeking redressal / suitable amendment. TNPDCCL take this opportunity to flag some of the issues once again for kind consideration of this Hon'ble Commission as below:	
1.	Regulation 17.1 of the GNA Regulations provides as under: 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 intra-State entities including distribution licensees; (ii) A drawee 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. (vi) An injecting entity which is granted Connectivity to intra-State transmission system and seeking GNA for purpose of injection into ISTS.	1. Regulation 17.1 does not facilitate DISCOMs to apply for GNA directly with CTUIL or enhancement of the quantum of GNA. 2. As per Clause 17.1 (iii), distribution licensees are eligible to apply for grant of GNA or enhancement of the quantum of GNA directly to CTUIL. However, the State owned Discoms having PPA with the generators are not included in the eligible entities to avail GNA directly from CTUIL. The financial liability is tied up with the DISCOMS while the eligibility for GNA applicant is denied. 3. Hence, State owned Distribution licensees shall be made eligible applicant for GNA.
2.	Revision of Deemed GNA: Regulation 18 (a) of CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022	<ul style="list-style-type: none"> GNA for the States was computed as per Reg. 18 (a) of CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022, wherein Tamil Nadu GNA had been worked out to 9177 MW. The same was arrived based on the average of 50% of Yearly Average of Daily Max ISTS drawl and 50% of Yearly Max ISTS drawl for the period 2018-19, 2019-20 and 2020-21.

	<ul style="list-style-type: none"> • Further, TNPDC had entered into PPA with NNTPS, wherein 600 MW was tied up through exclusive State network. However, during the period of consideration for deemed GNA computation, NNTPS was under commissioning stage in a phased manner. The drawl through the State lines were also included in the GNA computation. • In the meantime, NLDC has excluded the deemed LTA (power drawn through Intra state network (STU)) in respect of MAPS and NLC TPS-II Stage-1 and the same quantum has been deducted for computation of transmission charges and losses. • Subsequently, the regulation was amended to exclude the direct drawl through a discriminatory methodology that restricts the benefit of state direct drawl and continue to impose additional financial liability. • However, computation for all other purposes including RE- waiver computation, Deviation and Ancillary Service pool account deficit are carried out based on 9177 MW only. • In this regard, it is requested to revise the GNA quantum considering the exclusion of quantum drawn through Intra – state network from CGS. • Further, in the recent years the power scenario of the country has been changed drastically, hence it is essential to update the GNA quantum based on drawl data for the year 2021-22, 2022-23 and 2023-24 to match with the current ISTS drawl duly excluding the drawl through Intra state network.
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