



## Confederation of Indian Industry

### Comments on CERC Draft Grant of Connectivity and General Network Access to the Inter-State transmission system (and other related matters) Regulations, 2017

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
1	2.1. Definitions		When the Grant of Connectivity and General Network Access to the ISTS Regulation gets notified by CERC, the nodal agency viz. Central Transmission Utility (CTU) needs to be a distinct entity, separate from PGCIL	<p>There is an increased role of planning and coordination being envisaged for CTU and STU (governed under section 38(2)(b) and 39(2)(b) of the Electricity Act 2003) under this framework</p> <p>Therefore there is a greater need now to separate CTU from PGCIL</p>
2	2.1 (c)-iii	“Applicant for Connectivity” means: Any renewable energy generating station of 5 MW capacity and above but less than 50 MW capacity developed by a generating company in its existing generating station and	Request the CERC to include the projects under construction also for the transmission connectivity.	This is required as transmission connectivity is needed for the generating plants under construction also.

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
		seeking connectivity to the inter-State transmission system through the electrical system of the existing generating station		
3	2.1 (c)-iv	<p>“Applicant for Connectivity” means: Any company authorized by the Central Government or the State Government as</p> <ul style="list-style-type: none"> <li>a. Solar Power Park Developer or</li> <li>b. Wind Power Park Developer or</li> <li>c. Wind-Solar Power Park Developer.</li> </ul>	Request CERC to incorporate the objective criteria for Wind power park Developer or Wind-Solar Power Park Developer while notifying the final regulation.	We welcome the proposed incorporation of the Wind power park developer and Solar Power Park Developer as applicant of connectivity to the CTU Network. However, the draft regulation is silent about the eligibility criteria based on which central or state government will authorize a company to act as Wind power park Developer or Wind-Solar Power Park Developer.

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
4	2.1 (w)	<p>“Lead Generator” means a generator who is authorized through a formal agreement by other generators located in a geographically contiguous area for seeking interconnection with the ISTS at a single connection point and undertakes all operational and Commercial responsibilities in following the provisions of the Indian Electricity Grid Code and all other regulations of the Central Commission, such as grid security, scheduling and dispatch, collection and payment or adjustment of Transmission charges, deviation charges, congestion and other charges etc.</p>	<p>Would like to suggest CERC that “in nearby vicinity” should be included in the definition of “Lead Generator”.</p>	<p>There could be a case where two generators are nearby located and both will acquire land on the basis of their preference. Hence there can be a possibility where two generators are adjacent to each other but do not have same lead generator. In this case both generators having the same lead generator cannot fall in a geographically contiguous area.</p>

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
5	2.1 (y)	“Medium-Term contract” means the Power Purchase Agreement or sale purchase agreement between buyer and seller for sale or purchase of electricity for a period equal to or exceeding 1 year but not exceeding 5 years.	Would like to request that the time frame for Medium term contract should be between 1 to 7 years.	As per this draft regulation, Long term contract is for 7 years or more and medium term is up to 5 years. The gap of 2 years still persists and to provide more clarity in agreements.
6	7.2	An applicant shall apply for Connectivity to the nodal agency for a quantum equal to installed capacity of generating station less auxiliary power consumption in the specified format as approved by the Central Commission. A captive power plant shall apply for Connectivity for a quantum of maximum exportable capacity proposed to be connected to ISTS.	Request CERC to consider the proposed clause while finalizing the regulations. An applicant shall apply for Connectivity to the nodal agency for a quantum equal to installed capacity of generating station less auxiliary power consumption as specified in the prevailing RE tariff regulation of CERC, in the specified format as approved by the Central Commission. A captive power plant shall apply for Connectivity for a quantum of maximum exportable capacity proposed to be connected to ISTS.	The basis of the Auxiliary consumption needs to be clarified i.e. from where we can take normative value of Auxiliary consumption. The proposed clause makes prevailing RE tariff regulation of CERC values as benchmark for all.

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
7	7.14	Where after filing of an application or after grant of Connectivity, there has been any material change in the location of the applicant or change in the quantum of power to be interchanged with the inter-state transmission system, the applicant shall inform the same to the nodal agency.	We suggest limit of any material change should be within the range of 10% limited to 100 MW.	The change in quantum of Power should be limited. The term “material change” as specified needs more clarification from the Hon’ble commission. As per the earlier regulation, the change was permitted to the extent of 100 MW. To avoid the dependency on the nodal agency, proper range should be provided for the change in the quantum which will affect the corresponding changes in the planned transmission line.
8	Clause 7.38	The start-up power or infirm power so interchanged as provided in Regulation 7.34 and 7.35 of these Regulations by the unit(s) of the generating plant shall be treated as deviation and shall be regulated in terms of Central Electricity Regulatory Commission (Deviation Settlement Mechanism and related matters) Regulations, 2014, as amended from time to time or subsequent re-	We would like to request the commission to remove the Start-up power from the deviation mechanism but must be guided by the respective RLDC/SLDC.	Start-up power is mainly utilized for the purpose of auxiliary consumption, testing and commissioning activities. It is not fair to bring start-up power under the purview of Deviation and settlement mechanism. The start-up power so required depends upon the actual requirement and SCADA might not be installed for the deviation data projection.

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
		enactment thereof.		
9	11. Application for General Network Access (GNA)		Treatment of applications for Short Term open access should be included in the proposed GNA framework	Future of short term markets, power exchanges have not been discussed
10	11.1	The Applicant seeking GNA to inter-State transmission system shall file application within two and half years from the date of intimation of grant of: (a) Connectivity for Applicants other than renewable energy generating station or Solar Power Park Developer or Wind Power Park Developer or Wind-Solar Power Park Developer or (b) Stage-I Connectivity for renewable energy generating station or Solar Power Park Developer or Wind Power Park Developer or Wind-Solar Power Park Developer by CTU.	We request commission to link the cut-off date of GNA application from grant of Stage-II connectivity.	As per the clause 7.22 of the draft regulation CTU shall indicate the firm location of the substation or pooling station or switch yard where connectivity is to be granted while granting the Stage-II connectivity. So, linking the time frame for filing the GNA application with Grant of Stage-I connectivity will not be prudent as without firm location of the connectivity generator can't give point of injection in its GNA application.
11	11.7	The GNA Application shall be accompanied by Access	We request commission to please relook upon the amount of BG for	The Proposed rate of access bank guarantee rate of BG of Rs

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
		<p>Bank Guarantee of Rs. 20,00,000/- (Rupees Twenty Lakh only) per MW for the quantum of GNA sought. The Access Bank Guarantee shall be in favor of "Central Transmission Utility", as per FORMAT-GNA-4. The Access Bank Guarantee shall be issued by.....</p>	<p>access guarantee and revise it to Rs. 5 Lakh/ MW.</p>	<p>20,00,000 Lakhs per MW is very high. In addition to the access bank guarantee for stage- II connectivity a bank guarantee of Rs 5 lakh/ MW is to be submitted so the total required BG amount till the actual exchange of power from project to ISTS network is 25 Lakhs/ MW.</p> <p>As per clause no 24 (ii)(v) of Detailed Procedures of Central Transmission Utility under Regulation 27 (1) e Central Electricity Regulatory Commission Connectivity Regulation 2009, an applicant of LTA has to submit a construction Bank Guarantee at Rs. 5 lakh/MW. The relevant clause is reproduced for your reference.</p> <p><b>“(v) Applicant shall submit construction phase bank guarantee of Rs. 5 lakhs per MW for the quantum of long-term access sought “</b></p> <p>Further As per clause no 12.3 &amp; 12.4 of the connectivity regulation 2009 application of</p>

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
				<p>LTA shall be accompanied by a Bank guarantee of Rs 10,000/ MW and this BG will remain valid till execution of LTA agreement in case of augmentation of transmission system is required the both clauses have been reproduced below for your reference.</p> <p><b>12(3) The application shall be accompanied by a bank guarantee of Rs 10,000/- (ten thousand) per MW of the total power to be transmitted. The bank guarantee shall be in favour of the nodal agency, in the manner laid down under the detailed procedure.</b></p> <p><b>12(4) The bank guarantee of Rs. 10,000 /- (ten thousand) per MW shall be kept valid and subsisting till the execution of the long-term access agreement, in the case when augmentation of transmission system is required, and till operationalization of long-term access when augmentation of transmission system is not required.</b></p> <p>In connectivity regulation 2009</p>



Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
				<p>there is no requirement of BG for connectivity.</p> <p>The proposed rate of BG of Rs. 10 Lakh/ MW is two times increase from the existing rate, such substantial increase in the amount of BG will increase financial load on the generators.</p>
12	14. System Study by the Nodal Agency	The nodal agency i.e., CTU shall carry out system studies in ISTS to examine the adequacy of the transmission system corresponding to the time frame of commencement of long-term access to effect the desired transaction of power on long-term basis, using the Available Transfer Capability (ATC).	Validation of the data including drawal LTA/GNA of states, studies and proposal of New Transmission Plan submitted by Regional Study Committee as proposed by CERC in the Transmission Planning Regulation should also be dovetailed appropriately in the GNA Regulation	Role of validation committee vis-à-vis Central study committee and regional study committee has not been discussed in the GNA Draft Regulations. The governance framework being proposed by CERC in the Transmission Planning Regulation needs to be clearly mapped with the governance framework of the GNA framework
13	16. General Network Access by Generators	The new generation project intending to avail the transmission services from ISTS shall apply for GNA five (5) years prior to the expected date of commissioning of first unit of generation project. Renewable energy	<p>The validity and applicability of GNA may be clearly specified. In addition, there is no clarity on the GNA timeline matching with the PPA tenure.</p> <p>The CTU shall draw out a plan for granting GNA to the generator, which will be shared with the</p>	<p>In LTA regime, grant of “long-term Access” means the right to use the inter-State Transmission system for a period exceeding 7 years as per 6th Amendment of CERC Grant of Connectivity, LTOA, MTOA Reg 2009.</p> <p>Based on these criteria, PPAs</p>

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
		<p>generators including Solar Power Park Developer, Wind Power Park Developer, Wind-Solar Power Park Developer shall apply for GNA two (2) years prior to the expected date of commissioning of their generation project considering their low gestation period.</p>	<p>applicant along with the timelines. The CTU shall send quarterly reports on the progress to the applicant.</p> <p>The applicant shall be free to withdraw his application for GNA at any time before the CTU actually starts construction at no cost or liability.</p>	<p>have been stream lined also forming basis for planning.</p>
14	16. General Network Access by Generators	<p>Renewable energy generators including Solar Power Park Developer, Wind Power Park Developer, Wind-Solar Power Park Developer shall apply for GNA two (2) years prior to the expected date of commissioning of their generation project considering their low gestation period.</p>	<p>Timeline proposed for planning and commissioning of transmission system matching with commissioning of renewable energy projects is less.</p> <p>In order to retain the 2-year time period, MOP will also have to simultaneously notify fast track timelines from conceptualization to award of transmission evacuation under TBCB mode for such Parks</p>	<p>Although the gestation period for construction of generation plant is less, but planning transmission evacuation related to these parks from conceptualization to commissioning takes more time. As per MOP notification No.15/1/2013-Trans dated 10<sup>th</sup> Mar'2015, the timelines involved from concept to commissioning of transmission project through TBCB &amp; compressed time schedule is 36-56 months (TBCB) and 30-50 months (Compressed time schedule).</p>

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
15	17.1	Grant of GNA shall, by itself, not entitle any generating station to interchange any power with the grid till it both signs a PPA or sale purchase agreement (SPA) and inform the same to CTU and concerned RLDCs or sells power through exchange. An online portal for obtaining the information regarding PPA by a Generator or distribution licensee or trading licensee or consumer or any other entity shall be developed by CTU.	We request commission to consider the proposed clause for the optimal utilization of the national transmission assets.	<p>In case of Renewable based generating station getting connected on same node of CTU, there can be a situation when the one project is ready for commissioning and other may have some delay in commissioning. In this case CTU while operationalizing the GNA should give preference to the project which is ready for commissioning.</p> <p>The above is required because there can be a situation where CTU is partially ready with its proposed network and it is not able to transmit entire power proposed to be transmitted from associated node.</p> <p>So, it would be pertinent to operationalize the GNA of project which is ready for commissioning first irrespective of date of its GNA application.</p>
16	19.1	Access Bank Guarantee for Solar or Wind park developers or Renewable generators shall be Rs. 10 lakh/MW.	We would like to request CERC to minimize and link it with the Stage-II BG of Rs. 10,000 per MW.	Renewable energy developer is already burdened with high amount of bank guarantee required to be provided at each and every step of activities. The requirement of BG as Access

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
				<p>bank guarantee for GNA after submitting the BG for processing of Stage-II request is unfair for the developer.</p> <p>This is to bring in the notice of Hon'ble commission that GNA will be applied after grant of Stage-II and only interested developer will proceed for GNA. So, the guarantee applied is here will deter the serious developer to go for renewable development in the country.</p>
17	23.3	CTU shall consider the transmission capacity so made available for scheduling of transactions for other GNA Applicants.	If the CTU is able to find other applicants, whether MT or LT, the revenue realized from such MT or LT applicants shall be first used to set off the liability of the LT customer who has relinquished his LTA / GNA.	
18	24.2	In case an IPP relinquishes its GNA on its conversion to CGP, it shall pay Relinquishment Charges corresponding to capacity relinquished.	If the CTU is able to find other applicants, whether MT or LT, the revenue realized from such MT or LT applicants shall be first used to set off the liability of the LT customer who has relinquished his LTA / GNA.	
19	27.5 Treatment of delay	The transmission licensee should keep provision of foreclosure in the contract	This clause should be removed	This is a retrograde provision and will bring the sector back into the uncertainty that is

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
		made by it with EPC contractor. In case the augmentation has been awarded but CTU assesses that it is not required fully or partly keeping in view progress of generating station, the CTU shall intimate the licensee to foreclose its EPC contract based on the status of transmission line		being faced in the current situation. The spirit of the Transmission Planning and GNA Regulation is to transition into a more accurate system of data disclosure by generators and discoms and planning by the nodal agency. This will impact investments in the transmission sector and is not acceptable by transmission licensees
20	27.7	In the event of delay in commissioning of concerned transmission system from its scheduled date, CTU shall make alternate arrangement for dispatch of power at the cost of the transmission licensee. The interim arrangement so provided shall be removed with commissioning of actual planned system.	We request commission to make applicable the above-mentioned waiver in case of proposed interim arrangement also. In case of interim arrangement if it is required to schedule power under short term open access. The Present open access regulations prohibit the revision of day ahead schedule. The revision of month ahead schedule is allowed which is applicable from third day of application of revision. We request commission to allow RE generators to revise their schedule irrespective of open access mode as the generations of such projects are intermittent in nature.	Ministry of Power vide its letter dated 30.09.17 has exempted ISTS transmission charges and losses on wind and solar power projects entering PPA for sale of electricity to the distribution licensee for compliance of their renewable purchase obligations. The above exemption is applicable on wind and solar power projects commissioned till 31.03.19 and shall be applicable for 25 years from the date of commissioning.

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
21	Reliability Charges		Importance of Reliability Support charges which was mentioned in the Mata Prasad Committee Report has not been discussed either in Draft Transmission Planning Regulation or the Draft GNA Regulation	GNA should attract Reliability Charges as specified by the Commission. The Reliability Charges should be applicable from the date of first synchronization of a unit corresponding to its installed capacity minus normative auxiliary power consumption
22	Detailed Procedure		Detailed procedure may be issued along with GNA regulations for better understanding of roles & procedures	In 2009 detailed procedure had been issued along with Grant of Connectivity, LTOA regulations which gave the complete understanding of the procedures involved. However, in current draft regulations there are many procedural aspects which need clarity.
23	Linkage between Draft Transmission Planning Regulation and Draft GNA Regulation		Cross reference between Draft Transmission Planning Regulation provisions and Draft GNA Regulation provisions needs to be made at appropriate places	Differences in the procedures have been observed between Draft Transmission Planning Regulation and Draft GNA Regulation. Certain aspect like Validation Committee, System Studies and Regulatory approvals needs to be concurred.

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
24	Indicative Flow Chart of GNA / Connectivity		The GNA process flow diagram from the perspective of a State Discom/ STU should be included separately in the Draft GNA Regulation	The indicative flow chart illustrated in the Draft Regulation pertains predominantly from the perspective of a Generator applying for GNA. When a Discom applies for GNA, the process and timeline is not very clear
25	2.4.5 The requirement for STUs (Explanatory Memorandum)	The projected/anticipated quarterly maximum import/ export requirement in respect of a State (which should be called its Demand/Injection GNA respectively) from ISTS will be provided by the State Transmission Utility (STU) 4 years before for a period of 5 years to CTU.	Accuracy of futuristic demand projections for almost 8 years hence (for example in explanatory memorandum from 2018-2026) by STUs with support of Discoms is incredulous.	
26	Future drawl from ISTS directly by large industrial parks and micro-grids		There is need for clarity with regard to whether such large consumers/ direct long term open access ISTS consumers can apply for GNA to the nodal agency	Keeping in view several large industry houses/ commercial complexes planning micro-grids/ renewable energy parks within their premises, there will be a possibility of drawal requirement by such parks from the ISTS
27	Other Suggestions (a)		Renewable Energy Generating	

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
			<p>Station or Solar Power Park Developer who have been granted connectivity to ISTS and have not been physically connected to ISTS as on date of notification of this regulation, shall be deemed to have been granted Stage-I Connectivity. Further, they shall apply for Stage-II Connectivity application as per these regulations.</p>	
28	Other Suggestions (b)		<p>Banking should be introduced for all interstate RE transactions, so that it can address the barrier associated with variable nature of generation and maximize the use of energy resources. Hence, it played a key role to achieve more cost-effective deployment of investment and integration of more RE generation capacity. So, to promote interstate RE transactions cognizance of banking can't be avoided.</p>	





## Confederation of Indian Industry

### **Additional Comments/Suggestions on Grant of Connectivity and General Network Access to the Inter-State transmission system and other related matters) Regulations, 2017**

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
1	2.1. Definitions		When the Grant of Connectivity and General Network Access to the ISTS Regulation gets notified by CERC, the nodal agency viz. Central Transmission Utility (CTU) needs to be a distinct entity, separate from PGCIL	There is an increased role of planning and coordination being envisaged for CTU and STU (governed under section 38(2)(b) and 39(2)(b) of the Electricity Act 2003) under this framework  Therefore there is a greater need now to separate CTU from PGCIL
2	11. Application for General Network Access (GNA)		Treatment of applications for Short Term open access should be included in the proposed GNA framework	Future of short term markets, power exchanges have not been discussed
3	14. System Study by the Nodal Agency	The nodal agency i.e., CTU shall carry out system studies in ISTS to examine the adequacy of the transmission system corresponding to the time frame of commencement of long-term access to effect the desired transaction of power on long-	Validation of the data including drawal LTA/GNA of states, studies and proposal of New Transmission Plan submitted by Regional Study Committee as proposed by CERC in the Transmission Planning Regulation should also be dove-tailed appropriately in the GNA Regulation	Role of validation committee vis-à-vis Central study committee and regional study committee has not been discussed in the GNA Draft Regulations. The governance framework being proposed by CERC in the Transmission Planning Regulation needs to be clearly

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
		term basis, using the Available Transfer Capability (ATC).		mapped with the governance framework of the GNA framework
4	16. General Network Access by Generators	The new generation project intending to avail the transmission services from ISTS shall apply for GNA 5 years prior to the expected date of commissioning of first unit of generation project. Renewable energy generators including Solar Power Park Developer, Wind Power Park Developer, Wind-Solar Power Park Developer shall apply for GNA 2 years prior to the expected date of commissioning of their generation project considering their low gestation period.	The validity and applicability of GNA may be clearly specified.  In addition, there is no clarity on the GNA timeline matching with the PPA tenure.	In LTA regime, grant of “long-term Access” means the right to use the inter-State Transmission system for a period exceeding 7 years as per 6th Amendment of CERC Grant of Connectivity, LTOA, MTOA Reg 2009.  Based on these criteria, PPAs have been stream lined also forming basis for planning.
5	16. General Network Access by Generators	Renewable energy generators including Solar Power Park Developer, Wind Power Park Developer, Wind-Solar Power Park Developer shall apply for GNA 2 years prior to the expected date of commissioning of their	Timeline proposed for planning and commissioning of transmission system matching with commissioning of renewable energy projects is less.  In order to retain the 2-year time period, MOP will also have to simultaneously notify fast track timelines from conceptualisation to award of	Although the gestation period for construction of generation plant is less, but planning transmission evacuation related to these parks from conceptualization to commissioning takes more time. As per MOP notification No.15/1/2013-Trans dated 10 <sup>th</sup> Mar’2015, the timelines involved from concept to

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
		generation project considering their low gestation period.	transmission evacuation under TBCB mode for such Parks	commissioning of transmission project through TBCB & compressed time schedule is 36-56 months (TBCB) and 30-50 months (Compressed time schedule).
6	27.5 Treatment of delay	The transmission licensee should keep provision of foreclosure in the contract made by it with EPC contractor. In case the augmentation has been awarded but CTU assesses that it is not required fully or partly keeping in view progress of generating station, the CTU shall intimate the licensee to foreclose its EPC contract based on the status of transmission line	This clause should be removed	This is a retrograde provision and will bring the sector back into the uncertainty that is being faced in the current situation. The spirit of the Transmission Planning and GNA Regulation is to transition into a more accurate system of data disclosure by generators and discoms and planning by the nodal agency. This will impact investments in the transmission sector and is not acceptable by transmission licensees
7	Reliability Charges		Importance of Reliability Support charges which was mentioned in the Mata Prasad Committee Report has not been discussed either in Draft Transmission Planning Regulation or the Draft GNA Regulation	GNA should attract Reliability Charges as specified by the Commission.  The Reliability Charges should be applicable from the date of first synchronization of a unit corresponding to its installed capacity minus normative auxiliary power consumption

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
8	Detailed Procedure		Detailed procedure may be issued along with GNA regulations for better understanding of roles & procedures	<p>In 2009 detailed procedure, had been issued along with Grant of Connectivity, LTOA regulations which gave the complete understanding of the procedures involved.</p> <p>However, in current draft regulations there are many procedural aspects which need clarity.</p>
9	Linkage between Draft Transmission Planning Regulation and Draft GNA Regulation		Cross reference between Draft Transmission Planning Regulation provisions and Draft GNA Regulation provisions needs to be made at appropriate places	Difference in the procedures have been observed between Draft Transmission Planning Regulation and Draft GNA Regulation. Certain aspects like Validation Committee, System Studies and Regulatory approvals needs to be concurred.
10	Indicative Flow Chart of GNA / Connectivity		The GNA process flow diagram from the perspective of a State Discom/ STU should be included separately in the Draft GNA Regulation	The indicative flow chart illustrated in the Draft Regulation pertains predominantly from the perspective of a Generator applying for GNA. When a Discom applies for GNA, the process and timeline is not very clear
11	2.4.5 The requirement for STUs (Explanatory Memorandum)	The projected/anticipated quarterly maximum import/export requirement in respect of a State (which should be called	Accuracy of futuristic demand projections for almost 8 years hence (for example in explanatory memorandum	

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
		its Demand/ Injection GNA respectively) from ISTS will be provided by the State Transmission Utility (STU) 4 years before for a period of 5 years to CTU.	from 2018-2026) by STUs with support of Discoms is incredulous.	
12	Future drawl from ISTS directly by large industrial parks and micro-grids		There is need for clarity with regard to whether such large consumers/ direct long term open access ISTS consumers can apply for GNA to the nodal agency	Keeping in view several large industry houses/ commercial complexes planning micro-grids/ renewable energy parks within their premises, there will be a possibility of drawal requirement by such parks from the ISTS
<b>Additional Comments:</b>				
13	7. Grant of Connectivity	On completion of the dedicated transmission line, the generator(s) shall be required to hand over the dedicated transmission line to CTU for the purpose of operation and maintenance. CTU shall be entitled to normative operation and maintenance expenses as per CERC Tariff Regulations. The line shall be under the operational control of CTU for all the purposes.	In order to ensure best competitive prices to the end user, it is suggested to award O&M of dedicated lines under TBCB route.	

Sr. No.	Provision	Draft GNA Reg. 2017	Comments/Suggestions	Rationale
14	27. Treatment of delay in Transmission system or Generation projects	In case of delay of both generator and transmission licensee the date of start of GNA may be postponed by CTU as per progress assessed by CTU and mutual agreement and this will be duly notified on website of CTU	In case of delay of both generator and transmission licensee the date of start of GNA may be postponed by CEA as per progress assessed by CEA and mutual agreement and this will be duly notified on website of CEA.	According to this clause, CTU has the power to postpone the progress / COD. In such a case, the flow of adopted tariff / time period may also be notified since it has a direct implication on the financial assumption vis-à-vis investor during construction. Further, since CTU is also POWERGRID there is conflict of interest in giving this power of extension to CTU.