

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	General Network Access by Generators	16. 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.	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 conceptualization to award of transmission evacuation under TBCB mode for such Parks	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 th Mar'2015, the timelines involved from concept to commissioning of transmission project through TBCB & compressed time schedule is 36-56 months (TBCB) and 30-50 months (Compressed time schedule).
3	Treatment of delay	27.5 The transmission licensee should keep provision of foreclosure in the contract made	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

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		<p>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</p>		<p>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 clause will have an impact on the Transmission SBDs and will tantamount to modifying the SBD which is in the jurisdiction of MOP. This will ultimately impact investments in the transmission sector and is not acceptable by transmission licensees.</p>
		<p>27.2 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</p>	<p>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.</p>	<p>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.</p>
4	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	Difference in the procedures have been observed between Draft Transmission Planning Regulation and Draft GNA Regulation. Certain

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			appropriate places	aspects like Validation Committee, System Studies and Regulatory approvals needs to be concurred.
5	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