

Sr. No.	Clause no.	Existing Clause	Suggested Clause	Rationale
1.	2 (1) (b)	<p>“(b) ‘Associated Transmission System’ or ‘ATS’ shall have the same meaning as defined in GNA Regulations.</p> <p>ATS definition as per GNA Regulations: 6.2. Of the augmentation requirement as identified under Regulation 6.1 of these regulations, augmentation required for immediate evacuation of power of the Applicant (s), excluding terminal bay(s), shall be considered as the Associated Transmission System (ATS) for the Applicant(s).</p>		<p>In the draft Regulation, Associated Transmission System will consider “Augmentation required for immediate evacuation”, however the draft Regulation has not provided about the term of “Immediate evacuation”. In the absence of consideration under ATS, it would be difficult to determine ATS for developers in advance.</p> <p>Therefore, for a better clarify request to provide details under the immediate evacuation in the Regulations.</p>
2.	3(4)	<p>Principles of Sharing Transmission Charges Sharing of transmission charges for DICs shall be based on the technical and commercial information provided by the DICs, inter-State transmission licensees, NLDC, RLDCs, SLDCs and CTU to the Implementing Agency.</p>	<p>This may be modified as follows: Sharing of transmission charges for Drawee DICs shall be based on the technical and commercial information provided by the DICs, inter-State transmission licensees, NLDC, RLDCs, SLDCs and CTU to the Implementing Agency</p>	<p>As pe the GNA, the transmission charges would be shared by drawee DICs only</p>

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3.	11(1)	<p>“(1) T-GNA Rate (in Rs./MW/block) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under: Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) X 1.10 / (number of days in a month X 96 X GNA quantum, in MW, for all such entities located in the State considered for billing, for the corresponding billing period.)”</p>	<p>“(1) T-GNA Rate (in Rs./MW/block) shall be published for each billing month by the Implementing Agency which shall be calculated State-wise as under: Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) X 1.00 / (number of days in a month X 96 X GNA quantum, in MW, for all such entities located in the State considered for billing, for the corresponding billing period.)”</p>	<p>In the draft Regulations, proposed T-GNA is higher than 10% of existing GNA charges. As we know that the T-GNA will be granted on existing margin of the network with a high level of risk of curtailment, in case of network congestion.</p> <p>It is to be noted that in the existing Regulations, there is no additional charges for the short term and applicable practice the Short-Term Charges are equivalent to the long-term charges converted to paise/kWh, which is a substitute product for Short Term Access.</p> <p>In view of above, we request Hon’ble Commission to consider the same practice and consider the same GNA charges instead of additional 10% on the same.</p>

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4.	12(1)	<p>Transmission Deviation Transmission Deviation, in MW, shall be computed as under: (a) For a generating station, net metered ex-bus injection, in a time block in excess of GNA: Provided that for a hydro-generating station, schedules for overload capacity of 10% during peak season shall not be charged under transmission deviation.</p>	<p>Another proviso may be added under this clause, as follows: Any deviation, which is on account of the instructions of RLDCs shall not be accounted under transmission deviation</p>	<p>Generating station providing primary/ secondary/ tertiary ancillary services should be kept out of the purview of the deviation</p>
5.	12 (2)	<p>Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for a time block during a billing month shall be computed as under;</p> <p>1.35 X (transmission charges for GNA of entities located in the State, under first bill for the billing month in Rs.)/ (GNA quantum in MW of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)</p>	<p>Transmission Deviation Rate in Rs./MW, for a State or any other DIC located in the State, for a time block during a billing month shall be computed as under:</p> <p>1.05 1.35 X (transmission charges for GNA of entities located in the State, under first bill for the billing month in Rs.)/ (GNA quantum in MW of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)</p>	<p>In the proposed regulations, the Transmission deviation rate is on higher side in comparison of existing sharing Regulations of 2020, which is only 5% higher than transmission charges.</p> <p>It is to be noted that in the SOR of Sharing Regulations of 2020, the commission has mentioned the reason behind 5% of higher transmission charges, i.e.</p> <p><i>“An entity which has not obtained adequate LTA or MTOA and uses the system over and above its LTA or</i></p>

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				<p><i>MTOA, does not pay for such system on a regular basis, while other DICs bear charges for such system. Hence, charges for utilizing the system over and above LTA+MTOA has been kept marginally higher."</i></p> <p>In view of that we request Hon'ble Commission to consider same reasoning and consider the same 5% higher charges instead of 35% for Transmission deviation.</p>
6.	13(1)	<p>Treatment of transmission charges and losses in specific cases</p> <p>"(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNA-RE), for scheduling power from (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources:</p>	<p>Treatment of transmission charges and losses in specific cases</p> <p>"(1) No transmission charges for the use of ISTS shall be levied for the following GNA quantum (GNA-RE), for scheduling power from (i) REGS or RHGS based on wind or solar sources or (ii) ESS charged with REGS or RHGS based on wind or solar sources:</p>	<p>In the supplementary Draft Regulations, the waiver is not 100% of transmission charges for wind & solar, which means the Drawl DIC have to pay transmission charges and landed cost would be on higher side.</p> <p>Applicability of certain level transmission charges will make a huge impact to achieve the RE target of 500 GW by 2030 set by the nation. It would hit the inter-state RE transaction between the C&I consumers in</p>

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		$GNA_{RE} \text{ (in MW)} = GNA \times \frac{\sum_{n=1}^T \left(\frac{SDR_G}{SDTG} \right)}{T}$ <p>Where,</p> <ul style="list-style-type: none"> • SDRG is drawl schedule (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block. • SDTG is total drawl schedule (in MW) under GNA through ISTS from all sources in nth block. • 'n' is the nth time block • T is number of time blocks in a month = 96X number of days in a month <p>Provided that in case total drawl schedule (in MW) under GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule corresponding to GNA, the "SDTG" shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p>	$GNA_{RE} \text{ (in MW)} = GNA \times \frac{\sum_{n=1}^T \left(\frac{SDR_G}{SDTG} \right)}{T}$ <p>Where,</p> <ul style="list-style-type: none"> • SDRG is drawl schedule (in MW) through ISTS under GNA from entities covered under subclauses (i) and (ii) of this Regulation in nth block. • SDTG is total drawl schedule (in MW) under GNA through ISTS from all sources in nth block. • 'n' is the nth time block • T is number of time blocks in a month = 96X number of days in a month <p>Provided that in case total drawl schedule (in MW) under GNA through ISTS from all sources, for nth time block, is less than 75% of Maximum schedule corresponding to GNA, the "SDTG" shall be taken as 75% of maximum schedule corresponding to GNA for the nth block.</p>	<p>the non-RE rich states, which are ready to procure RE Power from RE Rich States</p> <p>Recently MoP has also provided a support to Inter – State C&I RE Projects, wherein consumers are eligible to get waiver of Transmission Charges for the procurement of Wind / Solar Power from ISTS Network.</p> <p>It is to be noted that MoP has issued order dated 23rd Nov 202, wherein Wind, Hydro PSP and BESS projects commissioned upto 30-06-2025, provided for waiver of inter-state charges which shall be applicable for</p> <ul style="list-style-type: none"> • <i>Solar or wind energy generation set up by any person/entity. The power generated from such sources can be self-consumed or sold to any entity either through competitive bidding, Power Exchange or through bilateral agreement.</i>

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			<p>Clause (1) of Regulation 13 of the Principal Regulations shall be substituted with any one of the provisions as under:</p> <ol style="list-style-type: none"> 1. $GNA_{RE} \text{ (in MW)} = GNA$ <p style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. Provided that if a dedicated consumer procuring / utilizing GNA for RE power only, wherein in all time block SDR_G will equal to SDT_G, the provision of 75% of maximum schedule corresponding to GNA will not apply for such consumer. <p style="text-align: center;">If, $SDRG = SDTG$, then $GNA_{RE} = GNA$</p>	<ul style="list-style-type: none"> • <i>For trading of electricity generated/ supplied from solar, wind & other sources in GTAM and GDAM upto 30-06-2025</i> <p>In view of that if a consumer will purchase power from Wind / Solar project for self-consumption or through bilateral agreement, it will not liable to pay any Transmission Charges.</p> <p>However, as per Supplementary draft Regulations, if a buyer is going to procure power under OA route through ISTS network, has to take GNA through STU or direct from CTU and liable to pay Transmission Charges as RE based consumer may not able to procure 75% of Power of GNA in all schedule.</p> <p>The objective behind to provide such waivers is to promote RE by all categories of generator & consumers, including C&I through Open Access.</p>



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				<p>In case of Open Access transaction, the landed cost for solar and wind developer would be on higher side as buying DIC has to pay GNA Charges based proposed formula.</p> <p>We would like to propose following options, which will help the objective of MoP to provide waiver of RE Projects till 30.06.2025.</p> <ul style="list-style-type: none"> i. Remove the condition of 75% for GNA_{RE}, so that RE Consumer may able to get complete waiver on procurement of RE Power for all time blocks. <p style="text-align: center;">GNA_{RE} (in MW) = GNA</p> <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> ii. It is to be noted that C&I consumers play a major role for promotion of Renewable Energy. As per proposed clause, dedicated RE based C&I Consumers have to make payment for uncertain amount of



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				<p>GNA, due to applicable provision of 75%.</p> <p>In view of that we would like to propose that if a dedicated consumer procuring / utilizing GNA for RE power only, wherein in all time block SDR_G is equal to SDT_G, the provision of 75% of maximum schedule corresponding to GNA will not apply for such consumer.</p> <p>If, $SDR_G = SDT_G$, then $GNA_{RE} = GNA$</p>
7.	13(3)	Where COD of a Connectivity grantee is delayed from start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity, the Connectivity grantee shall pay Yearly Transmission	Where COD of a Connectivity grantee is delayed from start date of Connectivity in terms of GNA Regulations, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity, the Connectivity grantee shall pay Yearly Transmission	In the draft Regulation, Generator has to make payment due to mismatch of SCD and connectivity, however it may possible that mismatch is due to some events, which are beyond the control of developers and able to get extension after examination from bidding agency.

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		Charges for the Associated Transmission System corresponding to Connectivity capacity which have not achieved COD.	<p>Charges for the Associated Transmission System corresponding to Connectivity capacity which have not achieved COD.</p> <p><i>Provided that if the delay of COD of Connectivity grantee is beyond the control and bidding agency has granted extension, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity, the Connectivity grantee shall get an extension of connectivity date till the revised COD date and have to pay Yearly Transmission Charges for the Associated Transmission System corresponding to Connectivity capacity from the revised COD.</i></p>	<p>In view of that, MoP has already issued order on 15th January 2021 to CERC and mentioned to allow extension of LTA date, if generator granted extension in COD by competent authority. The said order clearly provided that the commencement date and period of LTA shall be extended and aligned with the revised COD, in case the solar or wind project is granted extension in COD by the competent authority.</p> <p>Following is the relevant provision of MoP order:</p> <p><i>“... Provided also that where a Renewable Energy generation capacity which is eligible for ISTS waiver in terms of the extant orders, is granted extension in COD by the competent authority, the commencement and the period of the LTA</i></p>



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				<p><i>shall also get extended accordingly, and it will be deemed that the period of ISTS waiver is extended by the said period.”</i></p> <p>This order itself assumed that once the bidding agency extended COD, the applicability or levy of any transmission charges would commence only from the date of revised COD.</p> <p>It would be completely unfair to levy transmission charges on RE projects for the period that is already granted extension by the competent authority.</p> <p>The proposed provision in draft Regulations would make RE projects unviable, where COD may be extended by competent authority and have to face a huge financial impact of transmission charges.</p>

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				<p>In view of that request Hon'ble Commission to allow extension of connectivity date, if generator granted extension in COD by competent authority / bidding agency.</p>
8.	13 (7)	<p>Where Connectivity is granted to a Connectivity grantee on existing margins and COD of such Grantee is delayed, the Connectivity grantee shall, corresponding to the capacity that is delayed, pay transmission charges from the start date of such Connectivity at the rate of Rs. 3000 /MW/month:</p>	<p>Where Connectivity is granted to a Connectivity grantee on existing margins and COD of such Grantee is delayed, the Connectivity grantee shall, corresponding to the capacity that is delayed, pay transmission charges from the start date of such Connectivity at the rate of Rs. 1000 /MW/month:</p>	<p>In the draft Regulations, the applicable transmission charges are Rs. 3000 MW/Month for the connectivity grantee, have secured connectivity in exiting system and fail to achieve COD as per start date of such connectivity.</p> <p>Since, there is no additional capex/investment requirement by the ISTS licensees in the existing system, any penalties levied in case of delay in COD of the Grantee should only be nominal in nature.</p> <p>In view of that, we request Hon'ble Commission to consider it on the lower side and reduce the penalties to Rs. 1000/MW/Month.</p>

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9.	13 (10)	Regional entity Generating stations (a) drawing start-up power or (b) drawing power during shutdown after COD or (c) for REGS drawing power during non-generation hours or (d) injecting infirm power, through ISTS, shall pay transmission charges for injection or drawl beyond its T-GNA, at the rate of Transmission Deviation Rate for the State in which they are located:	Regional entity Generating stations (a) drawing start-up power or (b) drawing power during shutdown after COD or (c) for REGS drawing power during non-generation hours or (d) injecting infirm power, through ISTS, shall adjust withdrawal energy from the injected energy on monthly basis. In case of excess withdrawal, the generating station has to pay at the contract rate, or in the absence of a contract rate, at the National APPC rate.	<p><u>(c) for REGS drawing power during non-generation hours:</u></p> <p>Draft Regulations proposed to procure Auxiliary power at the rate of Transmission Deviation Rate for the State, which is in a much higher side, i.e.</p> <p><i>“1.35 X (transmission charges for GNA of entities located in the State, under first bill for the billing month in Rs.)/ (GNA quantum in MW of such entities located in the State, considered for billing, for the corresponding billing period X number of days in a month X 96)”</i></p> <p>It is to be noted that the existing tariff of ISTS connected projects are on lower side, considering the existing arrangement, wherein the aux power is netted off with the energy sent out. In case of applicable said provision in draft Regulations, the projects</p>



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				<p>may face a huge financial loss and difficult to sustain.</p> <p>(d) for injecting infirm power, through ISTS The Power Project generate infirm power before commissioning for a shorter period, which is unpredictable for Wind / Solar Projects to provide schedule as plants are in stabilization phase and injected power does not make an effect on grid as the quantum is negligible in the grid. The applicability of Transmission Deviation Rate will make a significant impact on the IPP before COD.</p> <p>In view of that we request to Hon'ble Commission to consider the same arrangement of netting off imported energy with exported energy to protect the interest of ISTS connected Wind / Solar developers.</p>