

1	<b>Sub-clause (j) of Clause (1) of Regulation 2</b>	<b>Definitions</b>
	Existing/Proposed Amendment	<b>Designated ISTS Customer’ or ‘DIC’</b> means the user of any transmission element(s) of the Inter-State Transmission System (ISTS) and shall include generating station, State Transmission Utility (STU), distribution licensee including State Electricity Board or its successor company, Electricity Department of State and any other entity directly connected to the ISTS and shall include an intra-State entity or a trading licensee that has obtained Medium Term Open Access or Long- Term Access to ISTS;
	Suggestion	This may be modified as follows:  <b>‘Designated ISTS Customer’ or ‘DIC’</b> means the user of any transmission element(s) of the Inter-State Transmission System (ISTS) and shall include generating station, State Transmission Utility (STU), distribution licensee including State Electricity ..... Entity, <b>standalone ESS</b> directly connected to the ISTS and shall include an intra-State entity or a trading licensee that has obtained <del>Medium Term Open Access or Long Term Access to ISTS</del> <b>GNA</b> ;
Justification	Standalone ESS can seek connectivity to ISTS as per 4.1 © of CERC (Connectivity & to ISTS) Regulations 2022 and is therefore a DIC	
2	<b>Clause (4) of Regulation 3</b>	<b>Principles of Sharing Transmission Charges</b>
	Existing/Proposed Amendment	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.
	Suggestion	This may be modified as follows: Sharing of transmission charges for <b>Drawee</b> 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
Justification	As the transmission charges are going to be shared by drawee DICs only	
3	<b>Clause (1) of Regulation 11</b>	<b>Transmission Charges for T-GNA</b>
	Existing/Proposed Amendment	..... 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.)”

	Suggestion	.....Transmission charges for GNA for entities located in the State, for the billing month, under first bill (in rupees) X <del>1-10</del> 1 / (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.)”
	Justification	A DIC is entitled to work out his most optimum drawal schedule considering requirement. There are situations when a the DISCOM DIC would be compelled to take T-GNA due to irregular changes in demand. In such cases, charging 10% higher than the normal charges may not be fair for the fact that it is being provided in the existing margin. We understand the advantage of forecasting and demand estimation at a holistic level, however this clause may be revisited and revised till the time drawee DIC attains the capability to forecast accurately.
4	<b>Clause (2) of Regulation 11</b>	<b>Transmission Charges for T-GNA</b>
	Existing/Proposed Amendment	Transmission charges for T-GNA shall be payable by drawee embedded entities located in the State, as per the last published T-GNA rate for the State, along with other charges or fees as per GNA Regulations and the Transmission Deviation charges, if any, as per these regulations.”
	Suggestion	It may be clarified whether the other entities eligible for T-GNA as per 26.1 of the above Regulations shall be liable for payment of T-GNA charges It is also requested to provide Definition of "embedded entities" for ample clarity
	Justification	As per 26.2 of CERC (Connectivity & GNA to ISTS) Regulations 2022, “A GNA grantee shall be eligible to apply for T-GNA over and above the GNA granted to it, as per eligibility under clause (a) of Regulation 26.1 this Regulation.”
5	<b>Clause (6) of Regulation 11</b>	<b>Transmission Charges for T-GNA</b>
	Existing/Proposed Amendment	Transmission charges for <del>Short Term Open Access</del> T-GNA collected in a billing month, <del>after adjustment as per Clauses (3) and (4) of this Regulation,</del> shall be reimbursed to the DICs in proportion to their share in the first bill in the following billing month.
	Suggestion	Clarity may be provided whether the DICs located within the geographical boundary of the state are being referred here or the charges are going to be reimbursed to all the DICs in the national pool.
	Justification	Since state charges will be applicable for T-GNA applicants within the state

6	<b>Clause (1) of Regulation 12</b>	<b>Transmission Deviation</b>
	Existing/Proposed Amendment	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 <b>GNA</b> : Provided that for a hydro-generating station, <b>schedules for overload capacity of 10% during peak season shall not be charged under transmission deviation.</b>
	Suggestion	Another proviso may be added under this clause, as follows: <b>Any deviation, which is on account of the instructions of RLDCs shall not be accounted under transmission deviation</b>
	Justification	Generating station providing primary ancillary services should be kept out of the purview of the deviation
7	<b>Deleted Clause 1 of Regulation 13</b>	<b>Treatment of transmission charges and losses in specific cases</b>
	Existing/Proposed Amendment	<del>..... No transmission charges and losses for the use of ISTS shall be payable for: ..... (ii) Such generation capacity has been declared under commercial operation during the period from 13.2.2018 to 31.12.2022; and .....</del>
	Suggestion	This clause provided for waiver of transmission charges and losses for wind and solar generators which achieved COD before 31.12.2022. This clause may be reinstated to provide for the requisite waivers for such projects as these projects have been set up taking into consideration the waivers available.
	Justification	The deletion of 13.1 adversely affects solar and wind projects which were set up under the open access category as these projects would no longer be able to avail the waivers. This would be tantamount to implementing changes retrospectively. Further, they also impact such inter-state projects with delivery points at the periphery of boundary of procuring state. Such projects were designed and tendered in the past which meant to avail the waivers provided to get the cheapest tariffs. If this waiver is withdrawn, then such RE projects would end up paying transmission charges and losses as the delivery point is at the periphery of the state tendering for RE power. Such projects need to be grandfathered for imposition of transmission charges and losses. A capacity of 635 MW of Tata Power would be impacted

8	<b>Clause (1) of Regulation 13</b>	<b>Treatment of transmission charges and losses in specific cases</b>
	Existing/Proposed Amendment	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 Charges for the Associated Transmission System corresponding to Connectivity capacity which have not achieved COD
	Suggestion	<p>The following proviso may be added:</p> <p>Where COD of a Connectivity Grantee is delayed from start date of Connectivity in terms of GNA Regulations, <b>under Force Majeure conditions and extension has been duly granted as per procedure set out in bid documents by appropriate authorities</b>, and the Associated Transmission System has achieved COD, which is not earlier than such start date of Connectivity, <b>the connectivity date shall be suitably extended to align with the revised SCOD of the generation project. The Yearly Transmission Charges for the ATS which has already achieved COD shall be recovered from DICs in accordance with Regulations 5 to 8 of these Regulations</b></p>
	Justification	<p>If a generation project has been granted extension of COD by MNRE/ intermediary procurer under Force Majeure conditions, then it wouldn't be justified to recover the transmission charges from the generator on account of the ATS achieving COD as per the earlier SCOD. It is suggested that this situation may be taken care of suitably in the Sharing Regulations.</p> <p>This safeguard has been specifically provided to developers impacted by the pandemic and other supply constraints vide MOP notification on Waiver of Transmission Charges dated 30.11.2021</p>
9	<b>Additional Point</b>	<b>Clause 43.3 (d) of CERC (Connectivity and GNA to ISTS) Regulations 2022</b>
	Existing/Proposed Amendment	(d) All the agreements executed under the repealed regulations shall be aligned with these regulations within 30 days of notification of these regulations.
	Suggestion	There are PPAs where the delivery point is at state periphery of the procuring state implying that all charges and losses till

		<p>the delivery point is to the account of the generator. Since ISTS charges and losses waivers were prevalent, this meant that generators did not have to bear such charges/ losses. Now with the Draft Sharing Regulations, generators would have to bear such charges and losses since the DISCOM is likely to pass these on to the generator. Request that a direction to align all such PPAs to new GNA regime be included in the Sharing Regulations which would explicitly state that charges and losses are to be borne by the drawee DIC and all agreements need to be aligned within 30 days of notification of these regulations or would be deemed to be aligned to the regulations if not done within the deadline.</p>
	Justification	<p>There are many agreements, which have been signed based on MoP's order on waiver of ISTS charges and losses. Initially the waiver was for the solar and wind projects, commissioned by December 2022 under competitive bidding route. However, as per the MoP's latest order dated 23.11.2022, the waiver of ISTS charges has been extended for all the renewable projects including open access projects, commissioned till 30.06.2025. With the waiver gone in light of the GNA regulations and the proposed amendments in the sharing regulations, fate of various open access projects are at stake.</p> <p>Further, some inter-state projects delivering at state periphery of procuring state would also be adversely impacted by these Regulations.</p>
10	<b>Additional Point</b>	<b>Payment Security Mechanism</b>
	Suggestion	Clauses with respect to Payment Security Mechanism may be retained
	Justification	This will safeguard the interest of the transmission service provider