

Date: 25.02.2022

To,  
Chairperson,  
Central Electricity Regulatory Commission  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building,  
36, Janpath, New Delhi- 110001.

Ref: Public notice No. L-1/261/2021/CERC

Subject: Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021

Dear Sir,

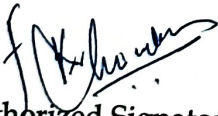
This is with reference to the above subject wherein Hon'ble Central Commission by way of the Notice cited under ref above dated 16.12.2021 sought comments on the proposed Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

Thus, For Bharat Aluminium Company Limited hereby submits comments on draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021

Thanking you.

Yours faithfully,

For Bharat Aluminium Company Limited



Authorized Signatory

**Comments/Inputs on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021**

In reference to the above cited draft regulation issued by Hon’ble CERC for grant of connectivity and General network access we submit our comments as under:

After implementation of the Electricity Act, 2003 and Open Access in Inter-state Transmission System (ISTS), for development of a robust transmission system in the country, the Commission in 2004 framed Regulations on Open Access in inter-state transmission system which were modified in 2009 namely Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium .term Open Access to the inter-State Transmission and related matters) Regulations, 2009 (Connectivity Regulations). The Commission also notified regulations like Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2010 (Sharing Regulations) and Central Electricity Regulatory Commission (Grant of Regulatory Approval for execution of Inter-State Transmission Scheme to Central.

The prevailing Connectivity Regulation has certain limits and issues which have been raised by System operator, CEA, CTU, POSOCO & IPPs. In view of these issues CERC has proposed the concept of General Network Access. Further, Hon’ble CERC has invited suggestions and comments from all stakeholders on the said draft regulation.

Therefore, we are hereby submitting our comments on draft regulation and praying to allow us to appear before Hon’ble Commission on the day of public hearing.

S. No.	Draft Regulation	Stakeholder’s Comments	Rationale
1	<p><b>2. Definition</b></p> <p><b>2.1.</b> In these regulations, unless the context otherwise requires.....</p> <p>(ah) “Renewable Hybrid Generating Station” or “RHGS” means a generating station based on hybrid of two or more renewable</p>	<p>The word collocated has to be specified in the below definition</p> <p>(ah) “Renewable Hybrid Generating Station” or “RHGS” means a generating station based on hybrid of two</p>	<p>From this definition it is imperative that to quality the status of Renewable Hybrid Generating Station two or more renewable source of generating stations has to be collocated then only these stations would be connected at same interface</p>

	<p>source(s) of energy with or without Energy Storage System, connected at the same inter-connection point;</p>	<p>or more <b>collocated</b> renewable source(s) of energy with or without Energy Storage System., connected at the same inter-connection point.</p>	<p>point. However, the criteria to connect at same interface point may not be required as such various solar and wind Re power stations are not collocated hence, they can't be quality as RE hybrid generating station.</p>
<p>2.</p>	<p><b>4. Eligibility for Connectivity to ISTS.</b></p> <p>4.1. The following entities shall be eligible as Applicants to apply for grant of Connectivity or for enhancement of the quantum of Connectivity:</p> <p>.....</p> <p>“(b) Captive generating plant with capacity for injection to ISTS of 50 MW <b>and above.</b>”</p>	<p>“(b) Captive generating plant with installed capacity for <del>injection to ISTS</del> of 50 MW <b>and above.</b>”</p>	<p>It is proposed that Captive generation is delicensed activity and meant to cater the captive load. However, in various events such as load reduction or unit outages CPPs are required to inject power in to grid as well as draw power from the Grid. In such scenarios import/export of power is to be required. it is noteworthy that due to installation of bidirectional meters at CPP end simultaneous import/export of Power is possible except in single time block.</p> <p>It is proposed that CPPs may be allowed to get connectivity basis the installed capacity.</p>

	<p>4.2 Notwithstanding anything contained in Regulation 4.1, the entities having Connectivity shall be eligible, on payment of application fees, to apply for enhancement of Connectivity of less than 50 MW subject to available capacity in transmission system.</p> <p>4.3. A generating station, already connected to or intending to connect to intra-State transmission system shall also be eligible as an Applicant for Connectivity</p>	<p>4.2 Notwithstanding anything contained in Regulation 4.1, the entities having Connectivity shall be eligible, on payment of application fees, to apply for enhancement of Connectivity of <del>less than 50 MW</del> subject to available capacity in transmission system.</p> <p>A clarification may be required that if two collocated generating stations owned and operated by one entity having two different voltage system would also be a qualified applicant for ISTS connectivity when one generating station connected with Intra State transmission system (STU).</p>	<p>It is further submitted that Captive power plants under regulation 4.1 may apply for GNA corresponding to installed capacity. However, there may be occasions when more surplus power is available with captive power plant when its captive load is less than the estimated load. Under such conditions, it may be permitted to transact power in short term market, subject to availability of transfer capacity.</p> <p>It is proposed that entities having existing ISTS connectivity may also be eligible for grant of connectivity under the draft regulation however, capping of quantum of connectivity enhancement shall be removed.</p>
3	<p>13. Injection of Infirm Power and drawal of Start-up Power Connectivity grantee shall be eligible to inject infirm power and draw start-up power in</p>	<p>It is humbly submitted that the drawl of startup power or injection of infirm power has been permitted on payment of transmission charges. Clarity is required as to how these</p>	

	<p>accordance with the provisions of the Grid Code.</p>	<p>transmission charges will be calculated specially when GNA has not been operationalized. A separate transmission charges need to be specified for start up power in terms of paise/kWh. In our opinion, these transmission charges may not be levied as the injection of infirm power is supplied to the grid at a regulated price which is nominal. If at all it is decided to levy the transmission charges, these should not be too onerous as the start up power and injection of infirm power will be intermittent and considering that these exchanges may take place before operationalization of GNA.</p>	
4	<p>17.2. Entities not covered under Regulation 17.1, which as on the date of coming into force of these regulations, are connected to the ISTS or for whom Connectivity granted under Connectivity regulations has become effective, shall be eligible for applying for grant of GNA to the ISTS for the quantum equal to the quantum of Connectivity, which shall be processed as</p>	<p>The proposed clauses 17.2, 18.1 (f) &amp; 37.7 provisioned for grant of deemed GNA to the applicants i.e. generating stations and discoms. It is humbly submitted that as per terms of long term PPA (under case-1) Genco's have been obligated to secure transmission corridor on long term basis, therefore they are the applicant for booking of the transmission corridor.</p> <p>Thus, it is suggested that as per</p>	

	<p>per Regulation 37.6 of these regulations.</p> <p>Clause 18.1 (f) &amp; 37 .7</p>	<p>proposed regulation GNA is deemed granted for the ongoing LTAs then all obligation but not limited to payment of transmission charges should be transferred to the beneficiary or buyer of the long term PPA.</p>	
5	<p><b>18. Deemed Grant of GNA;</b> .....</p> <p>(e) GNA deemed to have been granted to STU under clause(d) of this Regulation, shall be segregated for each intra-State entity, including distribution licensee, by the respective SLDC, and intimated to STU, Nodal Agency and NLDC within 1 month of publication of details by the Nodal Agency under clause (d) of this Regulation.</p> <p>Provided that in case an SLDC fails to provide such segregation, the pro rata GNA shall be allocated to each intra-State entity in the ratio of their Long-Term Access and Medium-Term Open Access, as included in the first bill raised in the previous month under the Sharing Regulations.</p>	<p>A word Short term Access has to be incorporated in below clause</p> <p>Provided that in case an SLDC fails to provide such segregation, the pro rata GNA shall be allocated to each intra-State entity in the ratio of their Long-Term Access and Medium-Term Open Access &amp; <b>Short-term Access</b>, as included in the first bill raised in the previous month under the Sharing Regulations.</p>	<p>It is understood that the proposed General Network Access framework as per the 2021 Draft GNA Regulations, all grid connected entities i.e. a selling entity or a buying entity shall have GNA. Which shall act as an open access to provide flexibility in terms of injection point for a buying entity under different types of contracts. Similarly selling entity has flexibility to sell any buying entity under different types of contracts.</p> <p>Thus, GNA shall conceptualize the optimum utilization of transmission infrastructure so entities drawing consistent power from grid under STOA shall also be eligible for deemed Grant of GNA.</p>

6	<p>22.2. Grant of GNA to entities other than STU</p> <p>.....</p> <p>(d) Entities covered under Regulation 4.1 and clause (iii) of Regulation 17.1 of these regulations shall furnish one-time GNA charge for Rs. one lakh per MW for the quantum of GNA one month prior to the start date of GNA. In case, such charges are not furnished by the entity within the specified timeline, the same shall be recovered by encashment of Conn- BG1, Conn-BG2 and Conn-BG3 as required. The proceeds of such one-time GNA charge shall be used for reducing Monthly Transmission Charges under the Sharing Regulations.</p>	<p>The proposal of levying one-time GNA charge for the applicant as defined under clause 4.1 &amp; clause (iii) of 17.1 is not justified. As such GNA grantee will pay the transmission charges for utilization of GNA allotted to them. Thus, the levy of one time charges should not be levied.</p>	
7	<p><b>23. Use of GNA by other GNA grantee(s)</b></p> <p><b>23.1.</b> An entity covered under Regulation 17.1 which is a GNA grantee, may authorise other entities covered under Regulation 17.1 which are</p>	<p><b>23.1.</b> An entity covered under Regulation 17.1 which is a GNA grantee, may authorise other entities covered under Regulation 17.1 which are GNA</p>	<p>It is understood that utilization of GNA by other GNA grantee is proposed for maximum utilization of GNA considering this fact tenure for use of GNA by other GNA Grantee(s) shall be</p>

	GNA grantee(s), to use its GNA, in full or in part, with prior approval of the Nodal Agency, for a period not exceeding 1 (one) year at a time on mutually agreed terms and conditions:	grantee(s), to use its GNA, in full or in part, with prior approval of the Nodal Agency, <del>for a period not exceeding 1 (one) year at a time on mutually agreed terms and conditions:</del>	agreed among the GNA grantees with prior approval from CTU. Further the modality of uses of GNA shall have to clearly notified by Hon'ble Commission.
8	<b>25. Relinquishment of GNA;</b>	<p>It is humbly submitted that the charges towards relinquishment of GNA by grantee under clause 25 (1) (a) &amp; (b) is proposed as the relinquishment charges shall be equal to 60 times, the transmission charges paid by such entity for the last month under the Sharing regulations, corresponding to the relinquished quantum.</p> <p>It is submitted that the basis of the said relinquishment charges are not specified under the GNA explanatory memo. Hon'ble Commission may specify the basis of imposing such relinquishment charges.</p> <p>The tenure of grant of GNA shall be active till its relinquishment by a grantee.. In case of retirement of a unit</p>	



		on completion of its commercial life, there should not be any relinquishment charges.	
9	<p><b>32. Revision of T-GNA</b></p> <p><b>32.1.</b> T-GNA granted under Exigency application category or under Advance application category for a period not exceeding one month cannot be revised.</p> <p><b>32.2.</b> T-GNA granted under Advance application category for a period of more than one month may be reduced for the balance period with a prior notice of one (1) month by the T-GNA grantee:</p> <p>Provided that applicable T-GNA charges for the quantum of T-GNA granted shall be payable for the notice period of one (1) month.</p>	It is humbly submitted that the right to revise the schedule under T-GNA shall also be in line with prevailing Open Access Regulation,	<p>32.1</p> <p>It is understood that under exigency application category the grant of T-GNA is deemed to scheduled however the right to revise the schedule shall have to be continue as per prevailing OA regulation as such payment of transmission charges is done as per utilization of transmission system.</p> <p>Further, revision for advance application category for less than one month shall also be in line with prevailing OA regulation.</p>
10	<p><b>Chapter 7</b></p> <p><b>Allocation of Transmission Corridor under GNA and T-GNA.</b></p>	<p>It is humbly submitted that as per proposed regulation under clause 17.1 (ii) &amp; (iii) buying entity, Discoms/bulk consumers are eligible for grant of GNA.</p> <p>The transmission charges payable by said GNA grantee shall be shared broadly in proportion to their GNA in</p>	

		<p>terms of the Sharing Regulations.</p> <p>In this regard it is submitted that in the event, a bulk consumer books a corridor for availing RE power for a longer duration (let say for more than 10 years), then the buyer has to obtain GNA for the peak quantum on round the clock basis for the entire tenure (in this case 10 years). As RE power is a non -RTC power, thus for the balance period, buyer has to purchase conventional power for which he has to book additional corridor (under TGNA) and make payment of transmission charges for the corridor booked under TGNA. We humbly submit that buyer should be waived from taking additional TGNA for the balancing power if requirement of the power is within the limit of GNA already granted for RE power. No liability for payment of transmission charges on</p>	
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		<p>conventional power if the capacity is utilised within the GNA limit.</p> <p>Further, MoP has introduced the waiver on the payment of ISTS charges for availing RE power on long term basis. We humbly request to clarify how the transmission charges would be computed for bulk consumer if it avails RE power on long term basis.</p>	
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