



CAPTIVE POWER PRODUCERS ASSOCIATION

(Registered U/sec. 25 of Company Act 1956 & Certificate of IT 12AA
CIN: U91990MH2003GAP141611)

Secretariat Office
Technocraft Industries (India) Ltd.
Technocrat House A-25 MIDC, Marol Andheri (East),
Mumbai 400093

Vikas Patangia
PRESIDENT

To,

Date :24th Jan, 2022

The Secretary,
Central Electricity Regulatory Commission,
3 rd & 4th Floor, Chanderlok Building, 36,
Janpath, New Delhi-110001

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

Dear Sir,

Captive Power Producers Association (“CPPA”) is representing the interest of Industries in various States and UTs having captive power plants at their industries in fulfilling the energy requirement of their industries through captively produced power having Captive generation plants.

First of all, we would like to thank you for the proposed Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

The proposed amendments are forward looking steps and will help in reviving the power sector and development of easier ISTS connectivity and Network Access.

In response to some of the proposed Regulations, we would like to submit our comments as per **Annexure – I.**

We request you to consider our comments while finalising the amendment.

Thanking you.

**Yours faithfully,
For Captive Power Producers Association**

Annexure – I

CPPA - Comments/suggestions on Draft CERC (Connectivity and GNA) Regulation, 2021

SL. No.	Chapter	Regulation	Proposed Amendment	Rational for Comments/Suggestions
1.	2 Definitions	Definition of Bulk Consumer	Definition of Bulk Consumer is missing. The definition is also captured in the CERC (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) Regulations, 2009.	<p>The proposed draft, Chapter 3, Regulation 12.5 provides for modality of construction of transmission line in case connectivity is to be granted to Bulk Consumers.</p> <p>Also the Proposed draft, Chapter 4, Regulation 17 (Eligibility for GNA) Reg 17.1-(iii) <i>A distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly, with a load of 50 MW and above;</i></p>
2.	Chapter 3 Connectivity	Regulation 4.1 Eligibility for Connectivity to ISTS	<p>It is suggested that clause should also include Eligibility for the Bulk Consumer for the Connectivity to ISTS along with Generating station(s), Captives, ESS, RE generators Etc.</p> <p>Additional Point should be added as below. <i>f) A Bulk consumer, seeking connectivity to ISTS, directly, with a load of 50 MW and above;</i></p>	<p>In the said Clause, “Bulk Consumer” is captured.</p> <p>Clearly the proposed draft has provisions for CTU connectivity to Bulk consumer and hence the same shall be captured in all relevant Regulations.</p> <p>Hence, the same should be defined in the definitions in</p>

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			<p><i>g) Bulk Consumers with load of 5 MW and above applying for grant of Connectivity to ISTS through the electrical system of a Bulk Consumer already having Connectivity to ISTS: Provided that such an entity applying for grant of Connectivity to ISTS has an agreement with the said Bulk Consumer to share its electrical system and dedicated transmission lines, if any</i></p>	<p>clause 2 of proposed amendments. And it should also be covered/Added in the Connectivity Eligibility for the Bulk Consumer in clause 4.</p> <p>Bulk consumer shall also be provided with such option whereby one Bulk Consumer is already connected with CTU with dedicated line.</p>
3.	Chapter 3 Connectivity	Regulation 4.3	<p>Please include Bulk consumer also as below:</p> <p><i>A generating station or Bulk Consumer, already connected to or intending to connect to intra-State transmission system shall also be eligible as an Applicant for Connectivity</i></p>	<p>Such an option shall also be provided to Bulk consumers as most of Bulk consumers are connected to STU to meet their power requirement. However, now due to requirement of more and more Renewable Energy, Consumers will now require to have CTU connectivity in order get Renewable Energy from Renewable Energy reach states. At the same time, they will continue to meet of their power requirement from DISCOM through intra-state connectivity.</p>

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4.	Chapter 3 Connectivity	Regulation 5 Application for grant of connectivity	<p>Please incorporate suitable provisions related to Bulk Consumer. Following provision may be added after Regulation 5.5 :</p> <p><i>5.6 An Applicant, which is a Bulk Consumer, shall apply for grant of Connectivity for the maximum quantum for which it intends to withdraw power from the Grid.</i></p>	Required in line with Comments in Sr no 1 & 2.
5.	Chapter 3 Connectivity	Regulation 5.6 Application for grant of connectivity	<p>Please include Bulk Consumer also as below:</p> <p><i>An Applicant may apply for grant of Connectivity at (i) a terminal bay of an ISTS sub-station already allocated to another Connectivity grantee or (ii) switchyard of a generating station or Bulk Consumer having Connectivity to ISTS, with an agreement duly signed between the Applicant and the said Connectivity grantee or the generating station or Bulk Consumer having Connectivity to ISTS, as the case may be, for sharing the terminal bay or the switchyard and the dedicated transmission lines, if any. The applicable Connectivity Bank</i></p>	In line with comments for inclusion of Bulk Consumer and efficient utilization of any infrastructure (subs station / dedicated line) etc. already developed while granting connectivity to Bulk Consumer.

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			<p><i>guarantee as per Regulation 8 of these regulations shall be submitted by such Applicant.</i></p> <p>8.2 proviso</p> <p><i>Provided that if the entity that has been intimated in-principle grant of Connectivity, (i) proposes to construct the terminal bay(s) on its own under Regulation 12.4 of these regulations, or (ii) seeks Connectivity at a terminal bay constructed or being constructed by another Connectivity grantee, or (iii) seeks Connectivity through electrical system or switchyard of a generating station or Bulk Consumer, no Conn-BG2 is required to be furnished</i></p> <p><i>Regulation 9.1 a)</i></p> <p><i>(a) Name of the ISTS sub-station or switchyard of the generating Station or Bulk Consumer, as the case may be, where Connectivity is granted.</i></p>	

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6.	Chapter 3 Connectivity	Regulation 15.1	Proviso to be reworded as below : <i>Provided that Connectivity granted to a parent company may be utilised by its subsidiary(ies) and Connectivity granted to a subsidiary may be utilised by its parent company.</i>	This will ensure efficient and economical utilisation of the connectivity infrastructure created.