



दिल्ली ट्रांसको लिमिटेड  
( दिल्ली सरकार का उपक्रम )  
**DELHI TRANSCO LIMITED**  
( A Govt. of NCT of Delhi Undertaking )

CORPORATE IDENTIFICATION NUMBER (CIN) - U40103DL2001SGC111529

No. F.DTL/203/F-21/2021-22/Oprn. GM(C&RA)/ 167

Date : 15/02/2022

The Secretary,  
Central Electricity Regulatory Commission,  
Central Electricity Regulatory Commission,  
3<sup>rd</sup> & 4<sup>th</sup> Floor, Chanderlok Building,  
36, Janpath, New Delhi-110 001

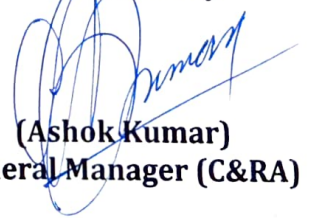
Subject : Regarding comments / suggestions / objections on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2021.

Sir,

In reference to the Public Notice issued by Hon'ble Commission on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2021, the comments / suggestions / objections of Delhi Transco Limited are enclosed herewith for kind consideration of the Hon'ble Commission.

Thanking you

Yours faithfully

  
(Ashok Kumar)  
General Manager (C&RA)

Enclosure : As mentioned above

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कार्यालय: महाप्रबंधक (वाणिज्यिक और विनियामक कार्य), 33 के वी गिड सब स्टेशन बिल्डिंग, आई पी एस्टेट, नई दिल्ली - 110 002  
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**COMMENTS / SUGGESTIONS / OBJECTIONS OF DELHI TRANSCO LIMITED ON DRAFT  
CENTRAL ELECTRICITY REGULATORY COMMISSION (CONNECTIVITY AND GENERAL  
NETWORK ACCESS TO THE INTER-STATE TRANSMISSION SYSTEM) REGULATIONS, 2021**

S. NO.	REGULATION NO.	PROVISION/ CLAUSE	DRAFT GNA REGULATIONS 2021	COMMENTS / SUGGESTIONS / OBJECTIONS OF DTL
<b>CHAPTER 2 : GENERAL PROVISIONS</b>				
A	3	3.7	<p>If any application for grant of Connectivity or grant of GNA is withdrawn before the in-principle grant of Connectivity in terms of Regulation 7 of these regulations or grant of GNA in terms of Regulation 22 of these regulations, 50% of the application fee shall be forfeited. Balance 50% of the application fee shall be refunded by the Nodal Agency to the Applicant within 15 days of withdrawal of the application:</p> <p>Provided that if any application is withdrawn after the in-principle grant of Connectivity or grant of GNA, such application shall be closed by the Nodal Agency within a period of 15 days from the date of withdrawal and 100% of the application fee shall be forfeited.</p>	<p>Since, the Applicant has to forfeit 50% or 100% of the application fee, depending upon the situation defined in these regulations. Therefore, if Nodal Agency fails to refund the application fee within the defined time period, the Nodal Agency should also pay applicable interest cost to the Applicant.</p>
<b>CHAPTER 3 : CONNECTIVITY</b>				
B	4	4.3	<p>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>A generating station, already connected to or intending to connect to intra-State transmission system, should not be allowed to seek separate connectivity with CTU, as the STU has already developed transmission system for those generating station(s) and <b>this may lead to sub-optimization of state transmission network.</b></p> <p>As the generating capacity is planned and augmented as per the demand of state and based on the expected load in future, transmission planning/augmentation is being done. Therefore, any changes be implemented as per this regulation, the planning in terms of long term technical and financial will get disrupted.</p>

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C	5	5.1	<p>An Applicant, which is a generating station including REGS, shall apply for grant of Connectivity to the Nodal Agency for the quantum equal to the installed capacity of the generating station:</p> <p>Provided that if such an Applicant already has Connectivity to intra-State transmission system for part of its installed capacity, it may apply for Connectivity to the ISTS for a quantum not exceeding the balance of the installed capacity;</p> <p>Provided further that if such an Applicant is a Renewable Hybrid Generating Station, it may apply for grant of Connectivity for a quantum less than or equal to the installed capacity.</p>	<p>A generating station, already connected to or intending to connect to intra-State transmission system, should not be allowed to seek separate connectivity with CTU for full/part of the installed capacity, as the STU has already developed transmission system for those generating station(s) and <b>this may lead to sub-optimization of state transmission network.</b></p> <p>As the generating capacity is planned and augmented as per the demand of state and based on the expected load in future, transmission planning/augmentation is being done. Therefore, any changes be implemented as per this regulation, the planning in terms of long term technical and financial will get disrupted.</p>
D	5	5.2	<p>Notwithstanding anything contained in Regulation 5.1, a generating station, with prior approval of CTU, shall be eligible to add, within the quantum of Connectivity granted to it, additional generation capacity, including ESS, and for this purpose, the generating station shall apply to CTU, along with non-refundable application fee of Rs 3 lakh along with applicable taxes;</p> <p>Provided that for such additional generation capacity, the said generating station shall be responsible for compliance with the Grid Code and other regulations of the Central Commission.</p>	<p>In the Explanatory Memorandum (5.2 – Illustrations (iv)), it has been mentioned that Generating station having installed capacity of 1000 MW and it is already connected to STU for 500 MW, may apply for connectivity to ISTS for balance 500 MW.</p> <p>However, as the Generating Station already connected to STU has connectivity to ISTS Network, then how can it once again seek for getting connected; as the connectivity does not facilitate any interchange of firm power, provision for one more connectivity, does not offer any value addition. Also, it shall lead to high cost of the transmission infrastructure in State as well as ISTS. Further, this may lead to the potential idling of the infrastructure that may have been created by the STU with huge investment.</p>

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				As the Generating Station is already connected to STU, therefore the existing transmission system of STU should be used/augmented first rather than constructing a new transmission corridor for connecting to CTU directly, thereby increasing the cost of power.
E	5	5.5	An Applicant, which is a Renewable Power Park Developer, shall apply for grant of Connectivity for the quantum for which it has been authorised by the Central Government or a State Government as a Renewable Power Park developer.	Any Power Park using the network of Intra-state System/STU, shall transmit its power through Intra-state system to ISTS Network.
F	5	5.8	Addition	The following clause shall also be added in reference to the entities connected to Intra-State Network/STU :  “(xi) NOC from STU from Intra-State Entities, if applicable”
G	6	6.1	Addition	The following proviso shall also be added :  Provided that the application for relinquishment of connectivity/GNA in ISTS system should also be considered for interconnection study.  The connectivity study should also be discussed with the Validation Committee.
H	8	8.2 (a)	.....  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, no Conn-BG2 is required to be furnished.	This regulations prohibits for submission of Conn-BG2 by any entity in case the terminal bay is constructed or being constructed by another Connectivity Grantee, however in the Explanatory Memorandum (5.13 (a) – Table), it has been mentioned that the purpose of Conn-BG2 is towards cost of terminal bay constructed or to be constructed. The requirement of Conn-BG2 for an already constructed or being constructed is required to be clarified.  Also, for the optimal use of transmission

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				network whether it belongs to ISTS or STU, planning and consideration of any new construction of terminal bay/ATS needs to be done in consultation with STU as per the provisions of Section 38 (2) (b) of the Electricity Act, 2003.
I	8	8.3	..... Provided that in the event of non-intimation by Nodal Agency within six months, the entity shall have the option of withdrawing the application for Connectivity and in such a case, the Conn-BG1 shall be returned within one month of exercising option of withdrawal by the entity and application shall be closed.	If the Nodal Agency fails to provide the intimation within six months, then if the entity opts to withdraw the application of Connectivity, the Conn-BG1 as well as <b>the Application Fee should be returned along with the applicable interest for the period withheld</b> , within one month of exercising option of withdrawal by the entity and application shall be closed.
J	10	10.7	An entity which has been intimated the final grant of Connectivity, shall furnish technical connection data, inter alia, generator data for fault studies, dynamic simulation data, details of data and voice communication, to the Nodal Agency as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1.	The time line for furnishing the requisite data should be defined.
K	10	10.7	Addition	The following clause may also be added :  (d) The implementation schedule for ATS should be defined stage wise in the Connectivity Agreement.
L	11	11.2	The Nodal Agency shall update the status of implementation of the ATS and terminal bays in respect of all Connectivity grantees, every quarter, on its website.	As per current practice, CEA monitors the construction/augmentation status of ISTS networks including the upstream and downstream transmission system. Therefore, the role of CEA should be introduce for reviewing and for taking corrective action based on the status of implementation of work.
M	11	11.3	The Nodal Agency shall review and take corrective action based on the status of implementation of work under the scope of the Connectivity grantee as submitted under Regulation 11.1 and status of implementation of the ATS and terminal bay(s) as updated under	Therefore, CEA should be the Nodal Agency for the functions to execute as defined in 11.2 & 11.3.

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			Regulation 11.2.	
N	12	12.1 & 12.2		Entities eligible for Grant of Connectivity as per Regulation 4.1, should also be included i.e. Generating Station including REGS, Lead Generator & Lead ESS.
O	12	12.5	In case of an entity covered under Regulation 17.1(iii), the line to connect such an entity to the ISTS and necessary augmentation for providing connection to the ISTS, shall be constructed and maintained by a licensee at the cost of such entity;	DISCOMs should not be permitted to seek connectivity directly from ISTS network and it should only be STU not DISCOM which should be permitted to seek connectivity with ISTS. However, existing distribution licensee, who have been granted license/allowed by CERC (like Railways as per IR Act) may be allowed connectivity with ISTS system. Therefore, no entity should be allowed to get directly connected to ISTS. And necessary augmentation for providing connection to ISTS should be provided by STU.
P	14	14.1	Interface meters shall be installed by the Central Transmission Utility for and at the cost of the Connectivity grantee and the GNA grantee covered under Regulation 17.1(iii) of these regulations.	As per CEA Metering Regulations, the interface meters are installed by CTU for the energy accounting of energy drawn from central sector generating stations by the state beneficiaries. Therefore, this clause should not be allowed.  Also, there will be double metering at the level of STU and CTU both.
<b>CHAPTER 4 : GENERAL NETWORK ACCESS (GNA)</b>				
Q	17	17.1 (ii) & (iii)	(ii) A buying entity connected to intra-State transmission system;  (iii) A distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly, with a load of 50 MW and above;	All intra-state entities must apply only through STU only. This would help the STU in a much better view of the future capacity requirements at all inter-connection points, and will help the CTU in optimizing the network planning process through a consolidated view of each state. Also, buying entity needs to be defined.  If Distribution Licensee becomes GNA applicant, that Licensee may draw power directly from ISTS without utilizing the STU network by creating required Transmission system. In such circumstances, existing Distribution Licensee have to bear the burden of entire fixed cost of the STU. Moreover, as per Electricity Act, 2003 STU has to plan and

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				<p>develop required Transmission System for serving existing as well as potential consumers of the State.</p> <p>If new Distribution Licensee draw power directly from ISTS in that case available STU network will remain underutilized and overall planning development of Transmission facility of the State by STU will be severely affected. For proper planning and better utilization of resources, such transmission facility requires to be developed by STU in the State and thus Distribution Licensee shall have to apply to STU or through STU for connectivity. So, draft Regulation may be modified to the extent of disallowing any Distribution Licensee to draw power directly from ISTS.</p>
R	18	18.1 (a)	<p>GNA for a (i) State including intra-State entity(ies) and (ii) other drawee entities, shall be the average of „A“ for the financial years 2018-19, 2019-20 and 2020-21: where, „A“ = {0.5 X maximum ISTS drawal in a time block during the year} + {0.5 X [average of (maximum ISTS drawal in a time block in a day) during the year]}</p>	<p>The method for grant of Deemed GNA to State should be based on LTA grant to State Beneficiaries instead of average of day peak and yearly peak, as peak load met through arrangement or combination of procurement of power through LTOA, MTOA, STOA, Renewable Obligations, etc.</p> <p>Generally, the State meets its peak demand through Short Term Market for which the transmission charges are paid for that specific period. Therefore, the quantum purchased under short term market should be excluded from the Deemed GNA as calculated in these regulations.</p>
S	18	18.1 (c)	<p>GNA for a State including intra-State entity(ies) as per clause (b) of this Regulation shall be deemed to have been granted to STU of that State on behalf of such intra-State entities and shall remain valid until relinquished in accordance with these regulations.</p>	<p>Independent Distribution Licensees shall need to connect through STU for proper estimation of GNA for a State.</p>
T	19	19.2	<p>STU, on behalf of intra-State entities including distribution licensees, may apply, once in a financial year (starting from the financial year following the financial year in</p>	<p>It is not practical to assess the GNA requirement for such a longer tenure (three years in advance) due to a number of uncertainties associated in the demand forecast. The total transmission access</p>

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			<p>which these regulations have become effective) by the month of September each year, for additional GNA for the next 3 (three) financial years, with entity-wise segregation indicating GNA within the region and from outside the region, as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1:</p> <p>Provided that such additional GNA quantum to be added in each of the next three financial years shall be applicable from a specified date of the respective financial year.</p>	<p>requirement of a utility over a period of time depends on the projected demand growth rate which itself is not certain.</p> <p>In case the demand remains lower (in the next four years) than the projected, the utility may actually require to draw a considerably lesser quantum from ISTS and may pay higher transmission charges for the extra GNA quantum projected for future years.</p> <p>DISCOMs/State Utilities should also be allowed to revise their already granted GNA quantum with a capping of maximum 15 % variation, before 3 months for next financial year atleast once, in case of situations/events beyond their control such as "Change in Law", "Force Majeure events", and other uncertainties.</p>
U	20	20.1	<p>Entities covered under clauses (ii) and (iii) of Regulation 17.1 of these regulations, indicating bifurcation of GNA within the region and outside the region, may apply for GNA from a specified date, for a specified quantum, and for a specified period of not less than eleven months.</p>	<p>As earlier submitted (comment against clause no. 17.1 (iii), any intra-state entity should not be allowed for grant of GNA directly instead it should be processed through STU only.</p> <p>Clarification may be provided under this regulation, GNA shall be granted on which transmission capacity (surplus/existing network/new ATS shall be created) to entities other than STU. If any entity seeks GNA for only 1 year (i.e. greater than 11 months), than how the utilization of such transmission capacity shall be justified.</p>
V	21	21	<p>The Nodal Agency, based on the applications received for grant of additional GNA, shall carry out system study in accordance with the Rules and Regulations made under the Act and the CEA Transmission Planning Criteria specified under the Act.</p>	<p>The clause may be modified with the consideration that the nodal agency shall facilitate the planning agencies to conduct system studies for creation of efficient economic system as mandated in the Act. And, if required, STU should be consulted for specific cases of ISTS and Intra-state system.</p>
W	22	22.2 (b)	<p>The Nodal Agency shall grant GNA to entities covered under clauses (ii) to (iv) of Regulation 17.1 specifying start date of GNA, as per the following timeline:</p>	<p>All intra-state entities must apply only through STU only. This would help the STU in a much better view of the future capacity requirements at all inter-connection points, and will help the CTU</p>



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			<p>(i) where GNA is granted on the existing system: by the end of the month subsequent to the month in which application complete in all respects has been received;</p> <p>(ii) where augmentation of transmission system is required: within 180 days from the end of the month in which application complete in all respects has been received:</p> <p>Provided that the Nodal Agency shall grant GNA with start date of GNA keeping in view the timeline of augmentation of the transmission system.</p>	<p>in optimizing the network planning process through a consolidated view of each state. Also, buying entity needs to be defined.</p> <p>If Distribution Licensee becomes GNA applicant, that Licensee may draw power directly from ISTS without utilizing the STU network by creating required Transmission system. In such circumstances, existing Distribution Licensee have to bear the burden of entire fixed cost of the STU. Moreover, as per Electricity Act, 2003 STU has to plan and develop required Transmission System for serving existing as well as potential consumers of the State.</p> <p>If new Distribution Licensee draw power directly from ISTS in that case available STU network will remain underutilized and overall planning development of Transmission facility of the State by STU will be severely affected. For proper planning and better utilization of resources, such transmission facility requires to be developed by STU in the State and thus Distribution Licensee shall have to apply to STU or through STU for connectivity. So, draft Regulation may be modified to the extent of disallowing any Distribution Licensee to draw power directly from ISTS.</p>
X	23	23.1	<p>An entity covered under Regulation 17.1 which is a GNA grantee, may authorise other entities covered under Regulation 17.1 which are 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:</p> <p>Provided that payment liability for transmission charges shall continue to be with the original GNA grantee that authorised its GNA to be used</p>	<p>It may be clarified that GNA Grantee who will utilize the quantum of GNA of other GNA Grantee, shall be within region or outside region as well as quantum of GNA shall also be defined.</p> <p>How the transmission congestion will be managed at inter/intra regional level and affect of long term transmission planning.</p> <p>Further, clarification may be provided in the Regulation regarding the payment of transmission charges between the 2 or more entities under Sharing Regulation and the rate of transmission charges.</p>

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			<p>by other GNA grantee(s):</p> <p>Provided further that for the purpose of calculating the transmission deviation charges under the Sharing Regulations, GNA authorised to be used by other GNA grantee(s) shall be reduced from original GNA grantee that authorised its GNA to be used by other GNA grantee(s) and shall be added to GNA of other GNA grantee(s) which is using it.</p>	<p>What is the purpose of T-GNA, when any GNA grantee can share/use the quantum with other GNA grantee.</p>
<b>CHAPTER 5 : RELINQUISHMENT OF CONNECTIVITY AND GNA</b>				
Y	25	25.1 (c)	<p>Relinquishment charges received under clauses (a) and (b) of this Regulation shall be used for reducing Monthly Transmission Charges under the Sharing Regulations.</p>	<p>Under this regulation, clarification may be provided that how the Monthly Transmission Charges shall be reduced under the Sharing Regulations.</p>
Z	25	25.2	<p>In case an intra-State entity including a distribution licensee having GNA covered under clause (i) of Regulation 17.1, substitutes GNA with GNA under clause (ii) of Regulation 17.1, GNA for such intra-State entity shall be reduced from the total GNA of STU as held under clause (c) of Regulation 22.1, for the quantum so substituted and for such substituted period.</p>	<p>If new Distribution Licensee draw power directly from CTU in that case available STU network will remain underutilized and overall planning development of Transmission facility of the State by STU will be severely affected. For proper planning and better utilization of resources, such transmission facility requires to be developed by STU in the State and thus Distribution Licensee shall have to apply to STU or through STU for connectivity. So, draft Regulation may be modified to the extent of disallowing any Distribution Licensee to apply for GNA directly from CTU.</p>
<b>CHAPTER 6 : TEMPORARY GENERAL NETWORK ACCESS</b>				
AA	26	26.1 (a) (i) to (iii)	<p>The following entities shall be eligible as Applicants to apply for T-GNA to ISTS:</p> <p>(a) As buyers,</p> <p>(i) Distribution licensee directly connected to ISTS;</p> <p>(ii) Bulk consumer directly connected to ISTS;</p> <p>(iii) A buying entity connected to intra-State transmission system;</p>	<p>If buyers, as specified in these regulation, draw power directly from CTU through T-GNA in that case available STU network will remain underutilized and overall planning development of Transmission facility of the State by STU will be severely affected.</p> <p>For proper planning and better utilization of resources, such transmission facility requires to be developed by STU in the</p>

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				<p>State and thus buyers shall have to apply through STU for T-GNA. So, draft Regulation may be modified to the extent of disallowing any buyers to apply for T-GNA directly from CTU.</p> <p>Provisions should be made in order to meet the peak demand that Distribution Licensee/buyer shall apply for T-GNA through STU/SLDC</p>
AB	26	26.2	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.	What is the purpose of T-GNA, when any GNA grantee can share/use the quantum with other GNA grantee.