



Abhishek Rohilla <cerc.abhishek@gmail.com>

Fwd: Draft CGNA Regulation 2021 - Comments from Enel Green Power

1 message

Abhishek Rohilla <abhishek.rohilla@delhi.gov.in>
To: cerc abhishek <cerc.abhishek@gmail.com>

20 February 2022 at 11:35

Regards,
Abhishek Rohilla
Dy. Chief (Engg.)
Central Electricity Regulatory Commission
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Mb. 9643439120

----- Forwarded Message -----

From: "Shilpa Agarwal" <shilpa@cercind.gov.in>
To: "Abhishek Rohilla" <abhishek.rohilla@gov.in>, "Ratnesh Kumar" <ratnesh.cea@gov.in>
Sent: Tuesday, February 15, 2022 6:42:13 PM
Subject: Fwd: Draft CGNA Regulation 2021 - Comments from Enel Green Power

----- Forwarded Message -----

From: mohammad aamir <mohammad.aamir@enel.com>
To: Sanoj Kumar Jha <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>
Cc: sonika hayaran <sonika.hayaran@enel.com>, sandy khera <sandy.khera@enel.com>, rahul saxena <rahul.saxena@enel.com>
Sent: Tue, 15 Feb 2022 17:44:34 +0530 (IST)
Subject: Draft CGNA Regulation 2021 - Comments from Enel Green Power

Dear Maam/ Sir,

Please find enclosed our comments on the Draft CGNA Regulations 2021 for your considerations. Please do let me know if any clarification or explanation is required on any of the comments.

Best Regards,
Mohammad Farrukh Aamir
Head - Regulatory
[Image result for enel green power logo]

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"SAVE PAPER - THINK BEFORE YOU PRINT!"

3 attachments

Enel Comments on Draft CGNA Regulations_14022022.docx
39K

Enel Comments on Draft CGNA Regulations_14022022.pdf
218K

Enel Green Power India Pvt Ltd - Comments on Draft Connectivity and GNA Regulation 2021

I. Regulation wise Comments

| S.No. | Draft C-GNA Regulation existing provision | Proposed Regulation | Remarks |
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| 1. | <p>5. 5.1 Application for Grant of Connectivity 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>5. 5.1 Application for Grant of Connectivity 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 capacity.</p> <p>Provided further that if such an Applicant is a REGS or Renewable Hybrid Generating Station, it may apply for grant of Connectivity for a quantum less than or equal to the installed capacity.</p> | <p>Regulations permit REGS with ESS to apply for connectivity for a quantum less than or equal to the installed capacity considering intermittent nature of generation for renewable sources and also to promote optimum utilization of EHV infra. The same principle might apply for REGS as well, as these sources don't generate power up to the installed capacity during major part of day/night and hence sub optimal utilization of EHV infrastructure. We suggest that REGS should also be allowed to apply for connectivity for a quantum less than or equal to the installed capacity. However, injection in grid should not exceed quantum of connectivity.</p> |
| 2. | <p>5.2 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</p> | <p>5.2 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 inform the CTU in writing apply to CTU,</p> | <p>If a generating company wishes to add additional generation capacity not exceeding the granted connectivity, then there should not be the requirement of submitting additional application fees. Since, there are no requirement of system enhancement or</p> |

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| | with applicable taxes, 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 | along with non-refundable application fee of Rs 3 lakh along with applicable taxes; 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 | additional system studies as the connectivity quantum remains unchanged. |
| 3. | 5.8 The application for grant of Connectivity shall contain, inter alia, the following details, as applicable, duly supported with relevant affidavit, as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: (vi) Registration Number along with certificate issued by the CEA Registry; | 5.8 The application for grant of Connectivity shall contain, inter alia, the following details, as applicable, duly supported with relevant affidavit, as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: (vi) Registration Number along with certificate issued by the CEA Registry; | The requirement of furnishing the registration number be included at the time of signing of the Connectivity Agreement and not at the stage of connectivity application. |
| 4. | 7. In-principle Grant of Connectivity by the Nodal Agency 7.1 In the event the Nodal Agency after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that no ATS is required, the Nodal Agency shall intimate in principle grant of Connectivity to the Applicant within 30 days from the last day of the month in which the application had been received along with details such as terminal bay(s), already available or to be developed under ISTS through CTU, and minimum design features for dedicated transmission lines to be constructed by the Applicant. 7.2 In case the Nodal Agency, after the interconnection study undertaken in accordance | 7. In-principle Grant of Connectivity by the Nodal Agency 7.1 In the event the Nodal Agency after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that no ATS is required, the Nodal Agency shall intimate in principle grant of Connectivity to the Applicant within 30 days from the last day of the month in which the application had been received along with details such as terminal bay(s), already available or to be developed under ISTS through CTU, Substation location (confirmed in case of operation and under construction and tentative in case of proposed) and minimum design features for dedicated transmission lines to be constructed by the Applicant. | As per Regulation 8.1 and 8.2, the applicant covered under Regulation 6.1 for which ATS is not required, on receipt of in-principle intimation under Regulation 7.1 is required to submit Conn-BG1, Conn-BG2 and Conn-BG3 within 1 month. Location of the substation is the most basic and essential requirement for an applicant before committing a financial exposure in the form of Bank guarantees. |

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| | <p>with Regulation 6.1 of these regulations, determines that ATS is required, the Nodal Agency shall intimate in-principle grant of Connectivity to the Applicant within 60 days from the last day of the month in which the application had been received:</p> <p>Provided that intimation for in-principle grant of Connectivity shall include the ATS and terminal bay(s), estimated cost of such ATS and terminal bay(s), minimum design features for dedicated transmission lines to be constructed by the Applicant and the likely date of start of Connectivity.</p> | <p>7.2 In case the Nodal Agency, after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that ATS is required, the Nodal Agency shall intimate in-principle grant of Connectivity to the Applicant within 60 days from the last day of the month in which the application had been received:</p> <p>Provided that intimation for in-principle grant of Connectivity shall include the ATS and tentative location of Substation, terminal bay(s), estimated cost of such ATS and terminal bay(s) to be provided in (INR XX/MW), minimum design features for dedicated transmission lines to be constructed by the Applicant and the likely date of start of Connectivity:</p> <p>Provided that the Nodal Agency shall plan the system such that maximum length of dedicated transmission line shall not exceed 40 km if the applicant project capacity is >1000 MW and within 30 kms if the applicant project capacity is <1000 MW from the switchyard of the REGS till the Substation location of the transmission licensee.</p> | <p>The applicant under 6.1 requiring ATS would receive an in-principle grant of connectivity under Regulation 7.2 and as per Regulation 8.3 (a) will have to provide Conn-BG1. The applicant has to commit a BG equal to INR 50 lakhs without even knowing the tentative location of the substation. Moreover, according to Regulation 8.3 (b) when the final estimate of Conn-BG2 is informed to the applicant, the tentative location of the SS is still not communicated and as per Regulation 8.3 (e), the applicant is expected to submit Conn-BG2. The applicant is expected to bear huge financial risk in the form of Conn-BG1 and Conn-BG2 without even knowing the tentative location of the substation. We suggest that the tentative location should be made part of in principle intimation or before any financial commitment is expected from the applicant.</p> <p>The Conn-BG2 amount should be limited to the immediate additional system required and must not include the cost of upstream/ downstream elements. The ATS estimate can be standardized like BG for the terminal Bay (INR XX</p> |

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| | | | <p>/MW of project capacity) so that it will be linked to capacity of REGS. Otherwise, a typical 300 MW or 3000 MW applicant has to bear the same ATS</p> <p>Regulation 8(8) of the 2009 Connectivity Regulations provides for a restriction on the length of dedicated transmission line that shall be planned by CTU. For a REGS the length of the DTL is a critical cost component and has commercial implication. Connectivity location which is far away from the identified REGS project site will render a good project unviable. The proviso of 2009 regulations enabled best sites (w.r.t resource intensity, nature of land revenue or private and cost) to be employed for siting the RE plant and the transmission system was pulled towards the RE resource sites. As renewable sources work at 1/3 of thermal source of generation, therefore a feasible EVH line length of REGS would also be 1/3rd of thermal power project i.e., 1/3rd of 100 KM (i.e., ~30 kms) considered in Connectivity Regulation 2009.</p> |
| 5. | <p>8.3 For cases covered under Regulation 7.2 of these regulations, the following procedure shall be followed: (a) The entity that has been intimated in-principle</p> | <p>8.3 For cases covered under Regulation 7.2 of these regulations, the following procedure shall be followed: (a) The entity that has been intimated in-</p> | <p>Without knowing the tentative location, a commitment of Conn-BG1 should be removed, or the tentative location of s/s should be provided along with in</p> |

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| | grant of Connectivity, shall submit its consent for execution of ATS and terminal bay(s), as intimated under Regulation 7.2 of these regulations, along with Conn-BG1, within one month of intimation of in-principle grant of Connectivity, failing which the application for Connectivity shall be closed and application fee shall be forfeited. | principle grant of Connectivity, shall submit its consent for execution of ATS and terminal bay(s), as intimated under Regulation 7.2 of these regulations, along with Conn-BG1 , within one month of intimation of in-principle grant of Connectivity, failing which the application for Connectivity shall be closed and application fee shall be forfeited. | principle intimation under Regulation 7.2. |
| 6. | 8.3 (b) The Nodal Agency, within 6 (six) months of furnishing of Conn-BG1 as per clause (a) of this Regulation, shall intimate to such entity, (i) amount of Conn-BG2 to be furnished towards ATS and terminal bay(s), which shall not exceed the estimated cost intimated under Regulation 7.2 of these regulations, (ii) the timeline for completion of ATS and terminal bay(s), and (iii) firm date of start of Connectivity | 8.3 (b) The Nodal Agency, within 6 (six) months of furnishing of Conn-BG1 as per clause (a) of this Regulation, shall intimate to such entity, (i) amount of Conn-BG2 to be furnished towards ATS and terminal bay(s) in INR (XX/MW) , which shall not exceed the estimated cost intimated under Regulation 7.2 of these regulations, (ii) the timeline for completion of ATS and terminal bay(s), and (iii) firm date of start of Connectivity (iv) Substation tentative location. Provided that, Conn-BG1 submitted in line with Regulation 8.3 (a) shall be returned if the tentative Sub-station location is not feasible for the applicant. Provided further that if such ATS and terminal bay(s) are planned for more than one entity (ATS planned for 1 GW vs application of 300 MW), Conn-BG2 shall be furnished in proportion to the quantum of Connectivity applied for by such entities. | The final ATS cost should not be lower than 10% of the estimate provided in the in-principle intimation. This would avoid non-serious estimation of ATS cost at the time of in principle intimation stage. High tentative ATS cost (overly budgeted) will not provide realistic cost to the applicant who would be using the cost estimates for participating in on-going tenders (considering high gestation period between in-principle and final grant of connectivity). In addition to ATS cost, the cost of dedicated EHV infra is also an important cost driver for the applicant to make decision, therefore, the applicant should be given an opportunity to withdraw the in-principle connectivity if the SS location informed after 6 months of system studies is not feasible for the project. The amount of Conn-BG2 should be |

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| | | | <p>proportional to the connectivity granted at the proposed S/s. The first applicant to a proposed s/s should not be burdened with Conn-BG2 equivalent to the complete cost of the ATS.</p> <p>The Conn-BG2 amount should be limited to the immediate additional system required and must not include the cost of upstream/ downstream elements. The ATS estimate can be standardized like Bay BG so that it will be linked to capacity of REGS. Otherwise, a typical 300 MW or 3000 MW applicant has to bear the same ATS cost as Con-BG2.</p> |
| 7. | <p>8.3 (c) In the event the Nodal Agency, does not intimate the details as per clause (b) of this Regulation within 6 (six) months, the Nodal Agency shall furnish the reasons for such non-intimation to the entity with a copy to the Central Commission within one month of expiry of such period of six months with a probable date by which the details of Conn-BG2 and such timeline shall be furnished:</p> <p>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.</p> | <p>8.3 (c) In the event the Nodal Agency, does not intimate the details as per clause (b) of this Regulation within 6 (six) months, the Nodal Agency shall furnish the reasons for such non-intimation to the entity with a copy to the Central Commission within one month of expiry of such period of six months with a probable date by which the details of Conn-BG2 and such timeline shall be furnished, provided that the revised date should not exceed more than 3 months:</p> <p>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</p> | <p>CTU should have a universal obligation to build an infrastructure if request by an applicant and within a well-defined stipulated timeline. Nine months are reasonably long timeline for PGCIL to provide the required information related to ATS.</p> |

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| | | month of exercising option of withdrawal by the entity and application shall be closed. | |
| 8. | 8.3 d) The amount for which Conn-BG2 is to be furnished as per clause (b) of this Regulation, shall be equal to estimated cost of ATS and terminal bay(s) and the timeline for completion of ATS and terminal bay(s) shall be based on the scheduled date of commercial operation for such ATS and terminal bay(s). | d) The amount for which Conn-BG2 is to be furnished as per clause (b) of this Regulation, shall be equal to estimated cost of <u>ATS (Rs. /MW)</u> and terminal bay(s) and the timeline for completion of ATS and terminal bay(s) shall be based on the scheduled date of commercial operation for such ATS and terminal bay(s). | There must be an upper ceiling of estimated cost of ATS on per MW basis Conn-BG2 should be split into two components and taken separately. One component is towards the terminal bays and the other component towards the ATS required. A REGS developer may be willing to construct the terminal bays at its own cost and willing to submit BG for the proposed ATS minus the terminal bays. |
| 9. | 9. Final Grant of Connectivity by the Nodal Agency 9.1. Within 15 days of receipt of Conn-BG2 and Conn-BG3, as applicable, the Nodal Agency shall intimate the final grant of Connectivity to the entity that has been intimated in-principle grant of Connectivity. The intimation shall contain, inter alia, the following: (d) In case of a proposed ISTS sub-station the tentative coordinates and the scheduled date of commercial operation of such ISTS substation | | Refer our comment in section (3) above. With respect to Regulation 7.1 and where Substation are at proposal stage, as per Regulation 8.3 (c) the applicant has to submit Conn-BG1, Conn-BG2 and Conn-BG3 even before knowing the Substation location. This deprives the applicant of a critical information for making a business decision. |
| 10. | 10.1. 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 | | Generator data may not be available at this early stage as equipment (WTGs, Transformers etc) will not be finalised by this time. Request to exempt this condition for signing of Connectivity Agreement (may be inserted 3-6 months SCOD) or execute this agreement 90 |

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| | Regulation 39.1. | | days prior to SCOD. CTU may execute transmission agreement post award of final connectivity and Connectivity Agreement 90 days before SCOD. |
| 11. | 10.5. Where Connectivity is granted at a proposed ISTS sub-station, the Nodal Agency, shall confirm the final coordinates within 2 months of signing of the Connectivity Agreement and such coordinates shall not be outside the radius of 5 km of the tentative coordinates already intimated. | | Please keep the option to developers to withdraw their application if the final location proposed is not acceptable. In that case, CTU to return BGs submitted without any penalty. |
| 12. | 10.7 The Connectivity Agreement, inter alia, shall include the following and other details as may be stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: (a) Details of the allocated terminal bay(s) at ISTS sub-station subject to provisions of Regulation 10.5 of these regulations; (b) Start date of Connectivity; and (c) Provision that in case of non-payment of transmission charges under Regulation 13 of the Sharing Regulations for more than 3 months from the due date , the same may be recovered by encashing Conn-BG1, Conn-BG2 and Conn-BG3, as required as per provision of Regulation 16.3 of these regulations. | 10.7 The Connectivity Agreement, inter alia, shall include the following and other details as may be stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: (a) Details of the allocated terminal bay(s) at ISTS sub-station subject to provisions of Regulation 10.5 of these regulations; (b) Start date of Connectivity; and (c) Provision that in case of non-payment of transmission charges under Regulation 13 of the Sharing Regulations for more than 6 months from the due date, the same may be recovered by encashing Conn-BG1, Conn-BG2 and Conn-BG3, as required as per provision of Regulation 16.3 of these regulations. | a) A period of 6 months will align it with clause 11.2 (A) (b) REVISED PROCEDURE FOR “GRANT OF CONNECTIVITY TO PROJECTS BASED ON RENEWABLE SOURCES TO INTER-STATE TRANSMISSION SYSTEM” b) What is the “due date”? please define. And in the cases of transition of connectivity, what will be the due period? |
| 13. | 12.4. Provided also that in such case of revocation of Connectivity, the Connectivity grantee shall dismantle the terminal bay within 3 months failing | 12.4 Provided also that in such case of revocation of Connectivity, the Connectivity grantee shall dismantle the terminal bay within 3 months | Dismantling of a Bay is not the most optimum solution. CTU should open that Bay for other interested applicant and in case connectivity is granted, the |

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| | which the CTU may utilise the bay for some other Connectivity applicant. | failing which the CTU may utilise the bay for some other applicant. If connectivity is granted to a New applicant, then new applicant will reimburse the cost of constructing the bay to original applicant within 1 month of signing the connectivity agreement with CTU. | CTU determined cost of Bay should be reimbursed to the initial grantee. |
| 14. | 16. Treatment of Connectivity Bank Guarantee 16.2 Conn-BG2 and Conn-BG3 shall be returned in five equal parts over five years corresponding to the generation capacity which has been declared under commercial operation by the Connectivity grantee | 16.2 Conn-BG2 and Conn-BG3 shall be returned <u>within one year</u> of the generation capacity which has been declared under commercial operation by the Connectivity grantee | If the project is commissioned and revenue is accruing, there is no reason that transmission charges are not paid (a recourse mechanism should be considered). Additional financial burden on RE project for 5 years is not justifiable |
| 15. | 16.3 In case of non-payment of transmission charges under Regulation 13 of the Sharing Regulations for more than 3 months from the due date, such transmission charges shall be recovered by encashing Conn-BG1 (if subsisting), Conn-BG2 and Conn-BG3, as required. Connectivity shall be revoked from the date when Conn-BG2 is not sufficient to cover transmission charges under Regulation 13 of the Sharing Regulations. | 16.3 In case of non-payment of transmission charges under Regulation 13 of the Sharing Regulations for more than 3 months from the due date, such transmission charges shall be recovered by encashing Conn-BG1 (if subsisting), Conn-BG2 and Conn-BG3, as required. Connectivity shall be revoked from the date when Conn-BG2 and Con BG-3 are not sufficient to cover transmission charges under Regulation 13 of the Sharing Regulations. | Connectivity should only be revoked only if quantum of Conn-BG1, Conn-BG2 and Conn-BG3 (if applicable) is exhausted. |
| 16. | 22.2 (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 | | This Regulation may be deleted. Conn - BG1, Conn-BG2 & Conn-BG3 have been kept as a security amount for recovery of Transmission charges. This one-time GNA charge is like a tax and would lead to additional financial burden to the |

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| | <p>timeline, the same shall be recovered by encashment of Conn BG1, Conn-BG2 and Conn-BG3 as required. The proceeds of such on time GNA charge shall be used for reducing Monthly Transmission Charges under the Sharing Regulations.</p> | | <p>new connectivity grantee which is unjustifiable</p> |
| 17. | <p>37.2. If Connectivity has been granted but Long Term Access has not been granted in accordance with the Connectivity Regulations and Connectivity is yet to become effective as on the date of coming into effect of these regulations, the same shall be treated as under:</p> <p>(a) The entity shall have the option of, either (i) to convert the Connectivity granted under the Connectivity Regulations as Connectivity made under these Regulations complying with the requirements under these regulations, or (ii) to surrender such Connectivity.</p> <p>(b) Such option under clause (a) of this Regulation shall be exercised by the applicant within one month of coming into effect of these Regulations, failing which the Connectivity granted under the Connectivity Regulations shall be considered as surrendered</p> <p>c) In case the Connectivity is surrendered in terms of option (ii) of clause (a) of this regulation or clause (b) of this regulation, Conn-BG1 and Conn-BG2, if any, furnished under the Connectivity Regulations shall be returned.</p> <p>Provided that in case the construction of terminal bay has been awarded for implementation under</p> | <p>37.2. If Connectivity has been granted but Long Term Access has not been granted in accordance with the Connectivity Regulations and Connectivity is yet to become effective as on the date of coming into effect of these regulations, the same shall be treated as under:</p> <p>(a) The entity shall have the option of, either (i) to convert the Connectivity granted under the Connectivity Regulations as Connectivity made under these Regulations complying with the requirements under these regulations, or (ii) to surrender such Connectivity.</p> <p>(b) Such option under clause (a) of this Regulation shall be exercised by the applicant within one month of coming into effect of these Regulations, failing which the Connectivity granted under the Connectivity Regulations shall be considered as surrendered</p> <p>c) In case the Connectivity is surrendered in terms of option (ii) of clause (a) of this regulation or clause (b) of this regulation, Conn-BG1 and Conn-BG2, if any, furnished under the Connectivity Regulations shall be returned.</p> | <p>Under 2009 Connectivity Regulations and subsequent amendments, the connectivity grantee has taken exposure of INR 3.5 Cr (Conn BG 1 and Conn BG2) and in case the milestones are not met as per the current regulations (readiness of EHV infra within SCoD + 6 months), the connectivity grantee would be penalized by the CTU invoking this BG amount. However, under the draft regulation which are yet to be implemented, the present connectivity grantees are forced to either surrender their present connectivity, in which case the Conn-BG1 and Conn-BG2 shall be forfeited (if bay construction has been awarded) much earlier than the date which is granted under the connectivity grant. In case where the connectivity grantee wishes to migrate, it will be forced to submit additional BG, amount of which is significant.</p> <p>Further, in case of migration if the connectivity grantee fails to meet the milestones as on "due date", then the</p> |

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| | ISTS through CTU, Conn-BG2 furnished under the Connectivity Regulations shall be encashed. | <p>d) In case the Connectivity is surrendered in terms of option clause (b) of this regulation, Conn-BG1 and Conn-BG2, if any, furnished under the Connectivity Regulations shall be returned.</p> <p>Provided that in case the construction of terminal bay has been awarded for implementation under ISTS through CTU, Conn-BG2 furnished under the Connectivity Regulations shall be encashed.</p> | <p>exposure on connectivity grantee shall be the amount of Conn-BG1, Conn-BG2 and Conn-BG3, which are not originally factored by the connectivity grantee.</p> <p>Since the connectivity regulations are proposed to be amended, we submit to kindly not to penalize or put additional financial burden on the connectivity grantees awarded with the connectivity under present regulations (i.e., 2009 Regulations) and therefore existing connectivity grantee should be given an option to surrender the connectivity without encashment of BG even if the Bay construction has been awarded. Enactment of new regulation should not be applicable retrospectively and the Connectivity Grantee under the existing regulations should have the continuing rights and obligations without any additional financial burden/ exposure.</p> |
| 18. | 37.2 (d) In case, the entity exercises the option to convert the Connectivity granted under the Connectivity Regulations as Connectivity under these Regulations in terms of option (i) of clause (a) of this regulation, the Nodal Agency shall, within next 30 days, intimate the amount of Conn BG1, Conn-BG2 and Conn-BG3, to be paid by such entity in terms of Regulation 8 of these regulations, after adjusting bank guarantee, if any, paid by such entity under the Connectivity | 37.2 (d) In case, the entity exercises the option to convert the Connectivity granted under the Connectivity Regulations as Connectivity under these Regulations in terms of option (i) of clause (a) of this regulation, the Nodal Agency shall, within next 30 days, intimate the amount of Conn BG1, Conn-BG2 and Conn-BG3, to be paid by such entity in terms of Regulation 8 of these regulations, after adjusting bank guarantee, if any, paid by such entity under the | <p>Connectivity granted under previous regulation and where SS locations are still not confirmed (but plan is approved and proposed, e.g., Fatehgarh 4), connectivity grantee should not be required to submit Conn-BG3 until SS tentative locations is confirmed.</p> <p>Similarly, wherever the existing connectivity grant would require ATS as</p> |

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| | Regulations. | Connectivity Regulations. Provided further that wherever CTU SS locations are not provided in intimation for connectivity, the Nodal Agency shall also provide the tentative location of the relevant SS (final location should be within 5 kms of tentative location). Until tentative location is provided, Conn-BG3 for connectivity under Regulation 7.1 and incremental Conn-BG2 in case of connectivity under Regulation 7.2 shall not become due. | per this regulation, until SS locations is confirmed, applicant should not be required to submit additional Conn-BG2. |
| 19. | 37.2 (f) On furnishing of Conn-BG1, Conn-BG2 and Conn-BG3 under clause (e) of this Regulation, existing agreements between the entity and the Nodal Agency shall be aligned with provisions of Regulation 10.3 of these regulations | 37.2 (f) On furnishing of Conn-BG1, Conn-BG2 and Conn-BG3 under clause (e) of this Regulation, existing agreements between the entity and the Nodal Agency shall be aligned with provisions of Regulation 10.3 of these regulations. Provided further that the due date as per Regulation 10.7 (c) which triggers encashment of BGs should be aligned with timeline for current connectivity approval or Transmission Agreement. | Refer our comment under sl no 12 regarding “due date” becoming part of Connectivity Agreement (Regulation 10.7). How will the “due date” be decided in the Connectivity Agreement for existing connectivity approvals? The connectivity Grantee should be given an option at the time of execution of Connectivity Agreement to declare a due date after which BGs can be encashed after giving a cooling period of 6 months. |
| 20. | Regulation 3.2 and 3.3 Application fee for connectivity and GNA increased from INR 3 to 5 lakh + taxes | | We request to keep the application fee same as provided in 2009 Connectivity Regulations |
| 21. | General Comment | | As per Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission |

| S.No. | Draft C-GNA Regulation existing provision | Proposed Regulation | <u>Remarks</u> |
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| | | | and related matters) Regulations, 2009, its procedure and amendment, Change in location/Technology is not considered as material change. However similar subsequent provisions have not been provided in draft C-GNA Regulation. It is prayed that similar provisions may be provided in the draft C-GNA Regulation. |
| 22. | General Comment | | Con BG-3 of Rs 2 lakh /MW required towards connectivity of surplus capacity in existing transmission system . Information about the Existing and Proposed evacuation system should be updated on real time basis by CTU on its website for better utilisation of Transmission assets. |