



Ranjit Gupta
Chairman
FICCI Renewable Energy CEOs Council

February 14, 2022

Shri Sanoj Kumar Jha
Secretary
Central Electricity Regulatory Commission (CERC)
New Delhi

Dear Shri Jha,

Suggestions/Comments on Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021

At the outset, FICCI would like to thank CERC for the proactive and concrete measures being taken for the progress of the power sector. The Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 is yet another positive step for strengthening the sector.

I am writing to submit some of the concerns/suggestions of the industry on the Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 which is enclosed with this letter.

We look forward to your kind consideration on the enclosed representation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ranjit Gupta', is written over a light blue horizontal line.

Ranjit Gupta

FICCI's Representation on
Draft CERC (Connectivity and General Network Access to the inter-State Transmission System)
Regulations, 2021

Submitted to:

Central Electricity Regulatory Commission (CERC)

Regulation wise Comments

S.No.	Draft Regulation existing provision	Proposed Regulation	Remarks
1.	3.2 & 3.3 Each application for grant of Connectivity shall be accompanied by a non-refundable application fee of Rs.5 lakh along with applicable taxes.		Please reduce application fees to Rs. 3 lakhs plus applicable GST. Applications pertaining to smaller and medium capacity are burdened with high cost of application fees. We request to keep the application fee same as provided in 2009 Connectivity Regulations
2.	3.7 If any application for grant of Connectivity or grant of GNA is withdrawn before the in-principle grant of Connectivity in terms of		We would like to submit that while making the application if margins are available and after application and during Grant of Connectivity margins are exhausted, in such scenario, 100%

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	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		application fees shall be reimbursed to applicant company. Subsequently if application is withdrawn for reasons attributable to applicant than 20% fees shall be forfeited as 50% amount is on higher side. It should be aligned with clause 3.5 of these regulations.
3.	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.		Enhancement shall be applicable to optimally use the full capacity of bay. It may not be restricted to less than 50 MW.
4.	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: 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; Provided further that if such an Applicant is a Renewable Hybrid Generating Station, it may	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: 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. Provided further that if such an Applicant is a <u>REGS or</u> Renewable Hybrid Generating Station, it may apply for grant of Connectivity	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.

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	apply for grant of Connectivity for a quantum less than or equal to the installed capacity	for a quantum less than or equal to the installed capacity.	However, injection in grid should not exceed quantum of connectivity.
5.	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 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	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 with any source of renewable energy , including ESS, and for this purpose, the generating station shall inform the CTU in writing through a letter confirming the addition and the source. apply to CTU, 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	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 additional system studies as the connectivity quantum remains unchanged.
6.	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. We suggest registering the project with CEA after Grant of Connectivity, PPA signing and clarity on project execution.
7.	7. In-principle Grant of Connectivity by the Nodal Agency	7. In-principle Grant of Connectivity by the Nodal Agency	

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	<p>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.</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 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>7.1 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.</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</p>	<p>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.</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</p>

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		<p>constructed by the Applicant and the likely date of start of Connectivity:</p> <p>Provided that the Conn-BG2 against ATS and terminal bay(s) should be capped basis INR/per MW.</p> <p>Provided further that the ATS and terminal bay(s) do not include HDVCs or any regional and national augmentation cost.</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>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 /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</p>

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			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 1/3 rd of thermal power project i.e., 1/3 rd of 100 KM (i.e., ~30 kms) considered in Connectivity Regulation 2009.
8.	<p>8.2 (b) Conn-BG3 @ Rs. 2 lakh/MW, for the existing ISTS, shall be furnished by entities covered under clause (a) of this Regulation.</p>		Please remove submission of CONN-BG3 as it is additional burden to developers. As Conn BG-1 & Conn BG-2 are sufficient to be maintained as security in relation to connectivity granted.
9.	<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 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.</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-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.</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 principle intimation under Regulation 7.2.
10.	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	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)	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

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	<p>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</p>	<p>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.</p> <p>Provided that the Conn-BG2 against ATS and terminal bay(s) should be capped basis INR/per MW.</p> <p>Provided further that the ATS and terminal bay(s) do not include HDVCs or any regional and national augmentation cost.</p> <p>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.</p> <p>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.</p>	<p>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).</p> <p>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.</p> <p>The amount of Conn-BG2 should be 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</p>

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			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.
11.	<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 one 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 month of exercising option of withdrawal by the entity and application shall be closed.</p>	<p>CTU should have a universal obligation to build an infrastructure if request by an applicant and within a well-defined stipulated timeline. Seven months are reasonably long timeline for PGCIL to provide the required information related to ATS.</p> <p>A RE plant has a very tight timeline to complete the project, in most cases within 18 months. Giving the flexibility to the nodal agency of denying connectivity after 6 / 7 months, would jeopardise project development to successfully commission the project within the scheduled timelines. Delay of 6 months would mean, 1/3rd of the project time and the developers would be midway with no option to change the connectivity and execute the project within the PPA timeline.</p>
12.	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 shall not exceed 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	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.

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		scheduled date of commercial operation for such ATS and terminal bay(s).	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.
13.	<p>9. Final Grant of Connectivity by the Nodal Agency</p> <p>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:</p> <p>.....</p> <p>(d) In case of a proposed ISTS sub-station the tentative coordinates and the scheduled date of commercial operation of such ISTS substation</p>		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.
14.	<p>Clause 9.1 (f)</p> <p>New Clause</p>	Connectivity start date from any Connectivity application cannot be more than 3 years from the grant of in-principal connectivity grant date	This will restrict non serious players from blocking the connectivity and allow only serious players to take connectivity and build project in a definite timeline.
15.	<p>9.2</p> <p>Where an Applicant has applied for Connectivity at the terminal bay already allocated to another Connectivity grantee or where two or more Applicants have applied for Connectivity at a common terminal bay, final grant of Connectivity as intimated under Regulation 9.1 of these regulations shall be subject to availability of capacity in the dedicated transmission lines.</p>		If space in existing bay is available than Original Grantee Consent shall be required before Grant of Connectivity as per clause 5.7 of these regulations.

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16.	<p>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 Regulation 39.1.</p>		<p>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 days prior to SCOD. CTU may execute transmission agreement post award of final connectivity and Connectivity Agreement 90 days before SCOD.</p>
17.	<p>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.</p>	<p>10.5. Where Connectivity is granted at a proposed ISTS sub-station, the Nodal Agency, shall confirm the final coordinates within 2 months of issuance of final grant of connectivity signing of the Connectivity Agreement and such coordinates shall not be outside the radius of 5 km of the tentative coordinates already intimated.</p>	<p>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.</p>
18.	<p>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</p>	<p>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</p>	<p>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?</p>

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	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.	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.	
19.	10.8 Connectivity grantee shall submit a copy of the signed Connectivity Agreement to the RLDC, in whose control area it is located.		CTU shall submit the copy of agreement. As CTU is Nodal Agency for implementation.
20.	12.4. Provided also that in such case of revocation of Connectivity, the Connectivity grantee shall dismantle the terminal bay within 3 months failing which the CTU may utilise the bay for some other Connectivity applicant.	12.4 Provided also that in such case of revocation of Connectivity, the Connectivity grantee shall dismantle the terminal bay within 3 months 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.	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 CTU determined cost of Bay should be reimbursed to the initial grantee.
21.	15.1 Provided that Connectivity granted to a parent company may be utilised by its subsidiary and Connectivity granted to a subsidiary may be utilised by its parent company.		Please clarify that any subsidiary is allowed to use connectivity of Parent Company and it should not necessary be 100% Wholly owned subsidiary.
22.	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	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

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	declared under commercial operation by the Connectivity grantee		burden on RE project for 5 years is not justifiable
23.	<p>16.3</p> <p>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.</p>	<p>16.3</p> <p>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 Conn-BG-3 are not sufficient to cover transmission charges under Regulation 13 of the Sharing Regulations.</p>	Connectivity should only be revoked only if quantum of Conn-BG1, Conn-BG2 and Conn-BG3 (if applicable) is exhausted.
24.	<p>Addition of extra point</p> <p>Clause 18.1. c(1) Carve out RE GNA quantum within the computed State GNA. The RE GNA quantum will include projects which are eligible for ISTS Transmission charges and losses waiver. The RE GNA quantum would be over and above the GNA quantum of the state and no transmission charges shall be payable for such RE GNA.</p>		<p>RE GNA quantum carveout over and above the total State GNA will help in keeping separate accounts for projects that are eligible for ISTS transmission charges and losses waiver. It is important that the waiver is retained in the GNA regime, to accomplish India's long term RE targets. The RE GNA quantum can be calculated basis the scheduled RE from the drawees end for the previous year and the expected RE addition eligible for ISTS waiver annually.</p> <p>Request the same to be incorporated in the sharing regulations.</p>
25.	<p>22.2 (d)</p> <p>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</p>		This Regulation may be deleted. Conn-BG1, Conn-BG2 & Conn-BG3 have been kept as a security amount for recovery of Transmission charges.

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	<p>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 on time GNA charge shall be used for reducing Monthly Transmission Charges under the Sharing Regulations.</p>		<p>This one-time GNA charge is like a tax and would lead to additional financial burden to the new connectivity grantee which is unjustifiable</p>
26.	<p>34.1 Transmission charge rate for T-GNA, in Rs./MW/time block, for a State shall be published for each month by the Implementing Agency in terms of the Sharing Regulations.</p>		<p>The defined charges should be on per unit basis i.e. Rs. /KWh of energy scheduled.</p> <p>a) As per current system a time block represents a single 15 minutes time slot, here clarity is needed whether the published charges defined would be adjusted by a factor of 1/4 or not.</p> <p>b) For a REGS there would be intermittent generation of energy in every timeblock, mechanism of paying transmission charges as MW per time block would escalate per unit cost on behalf of transmission charges exponentially because of intermittency in comparison to conventional thermal stations.</p>
27.	<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>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>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</p>

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	<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 ISTS through CTU, Conn-BG2 furnished under the Connectivity Regulations shall be encashed.</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 two 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>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>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 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</p>

S.No.	Draft Regulation existing provision	Proposed Regulation	Remarks
			<p>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>
28.	<p>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 Regulations.</p>	<p>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, and 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 Regulations.</p> <p>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</p>	<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 per this regulation, until SS locations is confirmed, applicant should not be required to submit additional Conn-BG2.</p>

S.No.	Draft Regulation existing provision	Proposed Regulation	Remarks
		provided, Conn-BG2 in case of connectivity under Regulation 7.2 shall not become due.	
29.	Clause 37.2 (e) Conn-BG1, Conn-BG2 and Conn-BG3 shall be furnished by the entity within two (2) months of intimation under clause (d) of this Regulation.	Clause 37.2 (e) Conn-BG1, and Conn-BG2 and Conn-BG3 shall be furnished by the entity within two (2) months of intimation under clause (d) of this Regulation.	During the transition to GNA regulation, the entity with projects covered under EA section 63, has applied for connectivity and has been granted connectivity, BG submitted as per previous Connectivity regulation will be adjusted accordingly i.e. against Conn-BG1 and Conn-BG2 and no new BGs are required.
30.	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, and 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.
31.	Clause 37.3 2 (b) Option under clause (a) of this Regulation shall be exercised by the entity within one month of coming into effect of these Regulations, failing which such Long term Access granted under the Connectivity Regulations shall be considered as surrendered.	Clause 37.3 2 (b) Option under clause (a) of this Regulation shall be exercised by the entity within one two months of coming into effect of these Regulations, failing which such Long term Access granted under	One month period is too less for the applicant. We request to increase the time period to apply from one month to two months.
32.			

S.No.	Draft Regulation existing provision	Proposed Regulation	Remarks
33.	<p>Clause 37.3 2 (d) In case, the entity exercises the option (i) of clause (a) of this Regulation to convert the Long term Access granted under the Connectivity Regulations as deemed GNA under these Regulations, it shall furnish Conn-BG1 for Rs. 50 lakhs and Conn-BG3 @ Rs. 2 lakh/MW corresponding to such Long term Access quantum within two (2) months of exercising such option. In case any Conn-BG2 has been furnished under the Connectivity Regulations, the same shall be treated as Conn-BG2 under these regulations. Subsequent treatment of Conn-BG1, Conn-BG2 and Conn-BG3 shall be in terms of Regulations 16.1 to 16.4 of these regulations. Bank Guarantee, if any, furnished by such entity under the Connectivity Regulations shall be adjusted.</p>	<p>Clause 37.3 2 (d) In case, the entity exercises the option (i) of clause (a) of this Regulation to convert the Long term Access granted under the Connectivity Regulations as deemed GNA under these Regulations, it shall furnish Conn-BG1 for Rs. 50 lakhs and Conn-BG2 3 @Rs 2lakh/MW corresponding to such Long term Access quantum within two (2) months of exercising such option. In case any Conn-BG2 has been furnished under the Connectivity Regulations, the same shall be treated as Conn-BG2 under these regulations. Subsequent treatment of Conn-BG1, and Conn-BG2 and Conn-BG3 shall be in terms of Regulations 16.1 to 16.4 of these regulations. Bank Guarantee, if any, furnished by such entity under the Connectivity Regulations shall be adjusted.</p>	<p>During the transition to GNA regulation, the entity with projects covered under EA section 63, has applied for connectivity and has been granted connectivity, BG submitted as per previous Connectivity regulation will be adjusted accordingly i.e. against Conn-BG1 and Conn-BG2 and no new BGs are required.</p> <p>Since the projects are through competitive bidding and the tariff is determined based on prevailing charges, taxes and duties at the time of bidding. Any additional cost where the project is already bid-out will have impact on the overall project.</p>
34.	<p>Clause 37.3 2 (e) On furnishing of Conn-BG1 and Conn-BG3 under clause (d) of this Regulation, the Long term access shall be treated as GNA deemed to have been granted under these regulations and the existing agreements between the entity and the Nodal Agency shall be aligned with provisions of these regulations.</p>	<p>Clause 37.3 2 (e) On furnishing of Conn-BG1 and Conn-BG2 3 under clause (d) of this Regulation, the Long term access shall be treated as GNA deemed to have been granted under these regulations and the existing agreements between the entity and the Nodal Agency shall be aligned with provisions of these regulations.</p>	<p>During the transition to GNA regulation, the entity with projects covered under EA section 63, has applied for connectivity and has been granted connectivity, BG submitted as per previous Connectivity regulation will be adjusted accordingly i.e. against Conn-BG1 and Conn-BG2 and no new BGs are required.</p>
35.	<p>Clause 37.3 3 (b) 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 Long term Access granted under the</p>	<p>Clause 37.3 3 (b) Option under clause (a) of this Regulation shall be exercised by the applicant within one two months of coming into effect of these Regulations, failing which the Long term Access</p>	<p>One month period is too less for the applicant. We request to increase the time period to apply from one month to two months.</p>

S.No.	Draft Regulation existing provision	Proposed Regulation	Remarks
	Connectivity Regulations shall be considered as surrendered.	granted under the Connectivity Regulations shall be considered as surrendered.	
36.	<p>Clause 37.3 3 (d)</p> <p>In case, the entity exercises the option (i) of clause (a) of this Regulation to convert the Long term Access granted under the Connectivity Regulations as GNA deemed to have been granted under these regulations, the Construction Bank Guarantee already furnished shall be treated as Conn-BG1 for Rs 50 lakhs and balance as Conn-BG2 under these regulations. In case no construction bank guarantee has been furnished pursuant to signing of PPA and PSA, it shall furnish Conn-BG1 for Rs. 50 lakhs and Conn-BG3 @ Rs. 2 lakh/MW corresponding to such Long term access quantum within two (2) months of exercising the option (i) under clause (a) of this Regulation. In case any Conn-BG2 has been furnished under Connectivity Regulations, the same shall be treated as Conn-BG2 under these regulations. The Conn-BG1, Conn-BG2 and Conn-BG3 shall be treated in terms of Regulations 16.1 to 16.4 of these regulations.</p>	<p>Clause 37.3 3 (d)</p> <p>In case, the entity exercises the option (i) of clause (a) of this Regulation to convert the Long term Access granted under the Connectivity Regulations as GNA deemed to have been granted under these regulations, the Construction Bank Guarantee already furnished shall be treated as Conn-BG1 for Rs 50 lakhs and balance as Conn-BG2 under these regulations. In case no construction bank guarantee has been furnished pursuant to signing of PPA and PSA, it shall furnish Conn-BG1 for Rs. 50 lakhs and Conn-BG2 3 @ Rs 2 lakh/MW corresponding to such Long term access quantum within two (2) months of exercising the option (i) under clause (a) of this Regulation. In case any Conn-BG2 has been furnished under Connectivity Regulations, the same shall be treated as Conn-BG2 under these regulations. The Conn-BG1, and Conn-BG2 and Conn-BG3 shall be treated in terms of Regulations 16.1 to 16.4 of these regulations.</p>	<p>During the transition to GNA regulation, the entity with projects covered under EA section 63, has applied for connectivity and has been granted connectivity, BG submitted as per previous Connectivity regulation will be adjusted accordingly i.e. against Conn-BG1 and Conn-BG2 and no new BGs are required.</p>
37.	<p>Clause 37.3 3 (e)</p> <p>On conversion of Construction bank guarantee as Conn-BG1 and Conn-BG2 or furnishing of Conn-BG1 and Conn-BG3 in terms of clause (d) of this Regulation, as applicable, the Long term Access granted under the Connectivity Regulations shall be treated as GNA deemed to have been granted under these regulations. The existing agreements between the entity and the Nodal Agency shall be aligned in line with provisions of these regulations.</p>	<p>Clause 37.3 3 (e)</p> <p>On conversion of Construction bank guarantee as Conn-BG1 and Conn-BG2 or furnishing of Conn-BG1 and Conn-BG2 3 in terms of clause (d) of this Regulation, as applicable, the Long term Access granted under the Connectivity Regulations shall be treated as GNA deemed to have been granted under these regulations. The existing agreements between the entity and the</p>	<p>During the transition to GNA regulation, the entity with projects covered under EA section 63, has applied for connectivity and has been granted connectivity, BG submitted as per previous Connectivity regulation will be adjusted accordingly i.e. against Conn-BG1 and Conn-BG2 and no new BGs are required</p>

S.No.	Draft Regulation existing provision	Proposed Regulation	Remarks
		Nodal Agency shall be aligned in line with provisions of these regulations.	
38.	Clause 37.3 3 (f) In case the entity fails to furnish Conn-BG1 and Conn-BG3 in terms of clause (d) of this Regulation, the Long term access granted to the entity under the Connectivity Regulations shall be considered as surrendered in terms of clause (b) of this Regulation.	Clause 37.3 3 (f) In case the entity fails to furnish Conn-BG1 and Conn-BG2-3 in terms of clause (d) of this Regulation, the Long term access granted to the entity under the Connectivity Regulations shall be considered as surrendered in terms of clause (b) of this Regulation.	During the transition to GNA regulation, the entity with projects covered under EA section 63, has applied for connectivity and has been granted connectivity, BG submitted as per previous Connectivity regulation will be adjusted accordingly i.e. against Conn-BG1 and Conn-BG2 and no new BGs are required.
39.	Clause 37.4 (1) (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 MTOA granted under the Connectivity Regulations shall be considered as surrendered.	Clause 37.4 (1) (b) Such option under clause (a) of this Regulation shall be exercised by the applicant within one two months of coming into effect of these Regulations, failing which the MTOA granted under the Connectivity Regulations shall be considered as surrendered.	One month period is too less for the applicant. We request to increase the time period to apply from one month to two months.
40.	37.5 Long Term Access granted under the Connectivity Regulations, which has not become effective, to a trading licensee other than that covered under Regulation 17.1 of these regulations shall be treated as withdrawn and bank guarantee furnished, if any, shall be returned.		Please explain how currently LTA Grantee will be treated. Since, LTA is Granted, LTA agreement is also signed but LTA is not effective. Then what mechanism will be followed.
41.	Clause 37.6 (1) (a) In case additional GNA as applied for under Regulation 17.2 can be granted on existing transmission system, the Nodal Agency shall grant such additional GNA on furnishing Conn-BG3 @ Rs.2 lakh/MW. Conn-BG3 shall be returned in five equal parts over the next five years starting from	Clause 37.6 (1) (a) In case additional GNA as applied for under Regulation 17.2 can be granted on existing transmission system, the Nodal Agency shall grant such additional GNA and adjust Conn-BG2 already submitted as per Connectivity Regulation which on furnishing Conn-BG3 @ 2 lakh/MW	During the transition to GNA regulation, the entity with projects covered under EA section 63, has applied for connectivity and has been granted connectivity, BG submitted as per previous Connectivity regulation will be adjusted accordingly i.e. against Conn-

S.No.	Draft Regulation existing provision	Proposed Regulation	Remarks
	the year when such GNA becomes effective or in accordance with Regulation 16.2 of these regulations, whichever is later.	shall be returned in five equal parts over the next five years starting from the year when such GNA becomes effective or in accordance with Regulation 16.2 of these regulations, whichever is later.	BG1 and Conn-BG2 and no new BGs are required.
42.	Clause 37.6 (2) Entities covered under Regulation 4.1 of these regulations which have been granted Long Term Access to the target region, shall furnish Conn-BG3 @ Rs. 2 lakh/MW. On furnishing such Conn-BG3, these entities shall be treated as Connectivity grantee under these regulations having GNA corresponding to such Long term access. Conn-BG3 shall be returned in five equal parts over the next five years starting from the year when such GNA becomes effective or in accordance with Regulation 16.2 of these regulations, whichever is later.	Clause 37.6 (2) Entities covered under Regulation 4.1 of these regulations which have been granted Long Term Access to the target region,, the Conn-BG2 submitted as per Connectivity Regulation shall be adjusted against the Conn-BG2 of this regulation and no additional BG is required. shall furnish Conn-BG3 @ 2 lakh/MW On adjustment of furnishing such Conn-BG2 3, these entities shall be treated as Connectivity grantee under these regulations having GNA corresponding to such Long term access. Conn-BG2 3 shall be returned in five equal parts over the next five years starting from the year when such GNA becomes effective or in accordance with Regulation 16.2 of these regulations, whichever is later.	During the transition to GNA regulation, the entity with projects covered under EA section 63, has applied for connectivity and has been granted connectivity, BG submitted as per previous Connectivity regulation will be adjusted accordingly i.e. against Conn-BG1 and Conn-BG2 and no new BGs are required.
43.	40.1 The transmission charges and losses for use of the inter-State transmission system shall be shared among buying entities of ISTS in accordance with the Sharing Regulations.	40.1 The transmission charges and losses for use of the inter-State transmission system shall be shared among buying entities of ISTS in accordance with the Sharing Regulations. Provided that the Clause 13(Treatment of Transmission Charges and losses in specific cases) of the Sharing Regulation is updated with the latest MOP orders on ISTS Transmission charges and losses waiver, which is reupdated from time to time.	CERC should include MoP order on waiver of ISTS charges and losses in the Sharing Regulation from time to time to allow the benefit and incentives provided to renewable energy sector by the Ministry of Power. We rely on Sharing Regulation, 2020 for the transmission charges and the provision carved out for renewable sector. We expect the similar provision extended while the GNA regulation is implemented.

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			<p>The transmission charges and losses for use of the inter-State transmission system shall be shared among consuming entities of ISTS in accordance with the Sharing Regulations.</p> <p>It is to be noted that in case of Standalone storage projects draw power and supply the same in different hours to ultimate buying entity.</p> <p>Transmission charges for the same must be borne by ultimate buying entity. during charging should not be counted as consuming entity.</p>
44.	General Comment		<p>As per Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission 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.</p>
45.	General Comment		<p>Information about the Existing and Proposed evacuation system should</p>

S.No.	Draft Regulation existing provision	Proposed Regulation	<u>Remarks</u>
			be updated on real time basis by CTU on its website for better utilisation of Transmission assets.
46.	Addition of extra point / Clarification required.		<p>The Existing eligibility of Stage-II connectivity requires either LOA or PPA as per Clause 9.2.1 or 50% land with Financial Closure/10% cost used in/of project project as per Clause 9.2.2 of 20.02.2021 amendment in Connectivity Procedure.</p> <p>By abolishing these requirement, anyone can apply for connectivity by merely submitting the requisite Bank Guarantees required for application. The requirement mentioned in Clause no. 9.2.1 and 9.2.2 indicate the serious intent of developers to execute the project and removal of these conditions would enable SQUATTING of Connectivity. The SQUATTING of Connectivity will have a negative impact to developers and to RE industry.</p> <p>Therefore, please reinstate the earlier conditions as prescribed in Clause 9.2.2 of 20.02.2021 amendment in Connectivity Procedure.</p> <p>Or</p> <p>Connectivity start date from any Connectivity application cannot be more</p>

S.No.	Draft Regulation existing provision	Proposed Regulation	<u>Remarks</u>
			<p>than 3 years from the grant of in-principle connectivity grant date</p> <p>This will restrict non serious players from blocking the connectivity and allow only serious players to take connectivity and build project in a definite timeline.</p>
47.	<p>Addition of extra point / Clarification required.</p> <p>The Applicants who have been granted Connectivity to ISTS for the generation projects based on particular renewable energy source(s) may, for the same generation capacity, change to another renewable energy source(s) in part or full, under intimation to CTU. In such cases, CTU shall incorporate the necessary change in connection agreement.</p>		<p>Please add a extra clause explicitly to allow developers to change source by incorporating necessary change in Connection Agreement as per Clause no. 4.4 of Amended Connectivity Procedure dated 20.02.2021.</p>
48.	<p>Addition of extra point Alignment to be done in Sharing Regulation</p> <p>No transmission charges applicable to developers, due to – 1)Time difference between effective connectivity date granted and the actual project COD difference,2) Adjustment of extended SCOD granted by REIAs with the Connectivity date 2) Staggered connectivity CODs, especially for larger projects</p>		<p>We understand that in the GNA regime there will no transmission charges applicability for all projects(including projects without ISTS transmission charges waiver like thermal projects) irrespective of commissioning of the project after the connectivity date is granted since, there will not be blockage of point-to-point transmission capacity unlike in the prevailing LTOA/MTOA regime.</p> <p>We request that the same is updated and clarified in the Sharing regulation. This</p>

S.No.	Draft Regulation existing provision	Proposed Regulation	<u>Remarks</u>
			will help clarify the concerns for – 1)Time difference between effective connectivity date granted and the actual project COD difference, 2) Staggered connectivity CODs, specially for larger projects..