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Fwd: GE Comments- CERC Draft Connectivity & GNA Regulations 2021

1 message

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

20 February 2022 at 11:56

Regards,
Abhishek Rohilla
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Central Electricity Regulatory Commission
3rd Floor, Chanderlok Building,
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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 4:56:27 PM
Subject: Fwd: GE Comments- CERC Draft Connectivity & GNA Regulations 2021

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

From: DHEERAJ JAIN <DHEERAJ.JAIN@ge.com>
To: Sanoj Kumar Jha <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>
Cc: RAJURAM CHOUDHARY <RAJURAM.CHOUDHARY@ge.com>, Amit Keoliya <Amit.Keoliya@ge.com>, sharmila barathan <sharmila.barathan@ge.com>
Sent: Tue, 15 Feb 2022 16:39:27 +0530 (IST)
Subject: GE Comments- CERC Draft Connectivity & GNA Regulations 2021

Dear Ms Shilpa & Mr. Jha

Hope you, your family and the CERC team are safe during this pandemic.

Thank you for the opportunity to provide recommendations on the "Connectivity and General Network Access to the inter-State Transmission System" Regulations, 2021

We would like to submit our recommendations (PDF & XL formats) on the Draft Connectivity and General Network Access Regulations for consideration by the CERC team.

We would welcome the opportunity to discuss these with you in greater detail.

Thank you for your continued support.

Thanks

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2 attachments

GE Suggestions CERC Draft Connectivity & GNA ISTS Regulations 2022.pdf
79K



GE Suggestions CERC Draft Connectivity & GNA ISTS Regulations 2022.xlsx
17K

S.No.	Clause	Clause Title	Extracted Clause Proviso	Comment/Suggestion	Rationale
1	4.2	Eligibility for Connectivity to ISTS	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.	This may be reworded as follow: 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 up to 100 MW within same application subject to available capacity in transmission system.	The present regulation gives interpretation that any enhancement can be up to 50 MW only and that to with a application fee of 3 lacs + GST , which will a commercial impact on generator ,henceforth suggestion will mitigate such impact.
2	4.3	Eligibility for Connectivity to ISTS	A generating station, already connected to or intending to connect to intra-State transmission system shall also be eligible as an Applicant for connectivity.	This may be reworded as follow: A generating station, already connected to or intending to connect to intra-State transmission system shall also be eligible as an Applicant for connectivity, however such generators schedule at injection point will be by buyer connected with ISTS as per CERC Regulations . Additional Request: Such generating stations connected with STU with long term buyer at ISTS , in particular to RE prolific states may be exempted from levy of intra state open access charges and it may be considered that such InSTS Open Access transmission charges can be set-off through GNA on annual basis.	A. The explicitly as suggested will bring clarity to the generator if their generating station is connected with Intra state with a inter-state buyer (with long term PPA) , how and under which regulation the scheduling of the power at the injection point will be governed. B. The request is with the objective to optimally utilise the available transmission network (InSTS & ISTS) , minimise overall Grid losses & giving more flexibility to Generator to connect their generating station with any nearby station (considering ISTS SS are limited & have significant timeline & cost for establishment of new network, whereas RE Generating stations have a very short 18 months full gestation period). Such evacuation with no levy of any transmission charges (InSTS –injection & drawl / ISTS) whatsoever shall be highly encouraging to continue in contributing towards GoI RE target of 500 GW by 2030.
3	5.2	Application for Grant of Connectivity	Generating station shall be eligible to add, within the quantum of Connectivity granted to it, additional generation capacity 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;	This may be reworded as follow: Generating station shall be eligible to add, within the quantum of Connectivity granted to it, additional generation capacity subject to available capacity in transmission system and for this purpose, the generating station shall apply to CTU under the original connectivity application without any additional application fee. along with non-refundable application fee of Rs 3 lakh along with applicable taxes.	If there is margin/scope available in the existing connectivity granted and if generator is enhancing generation to optimise the ISTS network connected with , any additional charge and application may not be required provided the cumulative installed capacity after enhanced generation is not exceeding granted quantum.
4	5.6, 5.7, 5.8 (IX), 9.2	Application for Grant of Connectivity	An Applicant may apply for grant of Connectivity at (i) a terminal bay of an ISTS sub-station already allocated to another Connectivity grantee or (ii) switchyard of a generating station having Connectivity to ISTS, with an agreement duly signed between the Applicant and the said Connectivity grantee or the generating station having Connectivity to ISTS.	Inclusion of following under new para 11.6 : CTU shall monitor the utilization of the dedicated transmission infrastructure. In case CTU finds that the dedicated transmission infrastructure remains under-utilized, it may seek an explanation from Connectivity grantee. Such Connectivity grantee shall explain the reasons through an affidavit duly signed by its authorized representative within 30 days of issue of such notice. If CTU is of the view that the spare capacity is not being put to use without reasonable justification, and it is resulting in denial of sharing of common infra to other connectivity applicants, the matter shall be brought to the notice of the Commission for directions with regard to the utilization of the available spare capacity.	A. This will mitigate unwarranted denial of sharing common infra with other applicants through a shared agreement for unutilised spare capacities. B. The suggested monitoring by CTU will enable optimal and efficient utilisation of ISTS Infra and in turn pave way for 500 GW RE Integration.
5	5.8	Application for Grant of Connectivity		Inclusion of following under new para 5.8 (xi) : "Energy sources of REGS (the source can be interchanged prior to execution of connectivity agreement)"	This will bring clarity to CTU to plan grid modelling basis on RE technology propose to be deployed and give flexibility to generator for changing their RE technology basis on project commercials and monitorisation.
6	6.2	Interconnection Study by the Nodal Agency and ATS	Any augmentation required, excluding terminal bay(s), to the existing ISTS identified under Regulation 6.1 of these regulations, shall be considered as the Associated Transmission System (ATS) for the Applicant(s).	This may be reworded as follow: Any augmentation required, excluding terminal bay(s), to the existing ISTS identified under Regulation 6.1 of these regulations, shall be considered as the Associated Transmission System (ATS) for the Applicant(s), however the ATS charges shall be confined on pro-rata basis to the generator inline of connectivity quantum and such ATS charges on the proposed/awarded/Un-planned ISTS sub-station shall be confined to the terminal bay only.	A. Any augmentation of existing SS will create additional capacity in the network beyond generator requested connectivity quantum , henceforth the charges of entire additional capacity should not be charged on the generator. Just to give some illustration few examples are as follows; Example : 1. Existing Rajgarh SS : In case of a generator seeking connectivity for 300 MW having a limitation of network strengthen (augmentation) beyond 200 MW should be charged for 100 MW only towards any ATS charges. 2. Existing Pallakkad SS : In case of a generator seeking connectivity for 400 MW having a limitation of operational issues (augmentation) beyond 300 MW should be charged for 100 MW only towards any ATS charges. B. This will bring clarity/risk analysis to the generator while running their financial model and factoring Con BG2 (ATS) amount for being connected with existing (inclusive of proposed/awarded) / unplanned ISTS SS.

S.No.	Clause	Clause Title	Extracted Clause Proviso	Comment/Suggestion	Rationale
7	8.2(a), (b)	Connectivity Bank Guarantee	(a) Conn-BG2 towards terminal bay(s) shall be furnished on the basis of number of terminal bay(s) allocated as under..... (b) Conn-BG3 @ Rs. 2 lakh/MW, for the existing ISTS, shall furnished by entities covered under clause (a) of this Regulation.	Inclusion of following under new para 9.3 : After grant of connectivity with existing ISTS, No involvement of ATS, such grantees shall have to achieve following milestone and submit the proof to CTU : (i) Ownership or lease rights or land use rights for 50% of the land require for capacity of connectivity within twelve months from date of executing connectivity agreement and (ii) Proof of release of minimum 10% equity duly supported by Auditor's certificate within twelve months from date of issue of connectivity. In the event of failure to achieve above milestones Connectivity shall be revoked by CTU under intimation to the grantee and Conn-BG1 and Conn-BG3 shall be encashed by CTU in accordance with the provisions under Clause 16 & 24 of this Regulations.	As ISTS having limited existing substations/bays in RE rich states and can lead to squatting of ISTS infra with extended connectivity dates (long-term COD) and no milestone timelines. The suggested inclusion is being partly adopted from the CERC REVISED PROCEDURE FOR "GRANT OF CONNECTIVITY TO PROJECTS BASED ON RENEWABLE SOURCES TO INTER-STATE TRANSMISSION SYSTEM" , Feb'21
8	9.1	Final Grant of Connectivity by the Nodal Agency		Inclusion of following under new para 9.1 (f) : In case of a unplanned ISTS sub-station, CTU shall endeavour to keep the tentative coordinates in proximity of to the generating station and the scheduled date of commercial operation of such ISTS substation to be aligned with agreed COD of generating station in issuing connectivity.	This will enable following : A. Monitorisation of non compete RE potential sites (virgin sites). B. Minimise DTL length. C. Timely COD of planned generating station.
9	10.1, 10.2, 10.4	Connectivity Agreement	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.	Concern: A. Ask of specific parameters /data should be clearly defined during FTC only and should align with international code of practice to run simulation test by concern RLDCs. B. Request from RLDC's to furnish all technical details & models from different OEMs lead to IP information of OEMs (WTG, Invertors, ESS) which in absence of non-disclosure agreement (NDA) by RLDC with OEMs is posing serious challenge. Request: The Report of the Expert Group "Review of Indian Electricity Grid Code" to factor above concerns and define required technical details for WTG's /Invertor/ESS	
10	10.3	Connectivity Agreement	Within 30 days of the intimation of connection details by the Nodal Agency under Regulation 10.2, Connectivity Agreement shall be signed between the Nodal Agency and the entity which has been intimated final grant of Connectivity. On signing of the Connectivity Agreement such entity shall become the Connectivity grantee	Inclusion of following under new para 10.10 : The start date of connectivity and linked deemed GNA shall not be revised post signing of connectivity agreement.	This explicitly will refrain connectivity grantees from frequent revision /changes in the start date of connectivity and in-turn will avoid squatting of ISTS Infra.
11	12.1	Dedicated Transmission Lines and Bay(s)	In case Connectivity grantee is a generating station or a captive generating plant or a standalone ESS, the dedicated transmission lines shall be established, operated and maintained by such Connectivity grantee.	Clarification : In case of a bulk consumer how and who will established, operated and maintained the DTL	The clause hasn't provisioned for establishment of DTL & terminal bays in case connectivity grantee is bulk consumer, the said matter of RIL has recently been ordered by CERC , the key decision of the order may be suitably incorporated in this regulations.
12	15.1	Transfer of ConnectivityProvided 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.	This may be reworded as follow: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, however in case of Renewable Power Park Developer the connectivity may be transferred to another entity before COD.	This restriction of transfer should be waived/exempted for Renewable Power Park Developer to enable project developer to get connectivity transferred in their entity
13	22.2 (d)	Grant of GNA to entities other than STU	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.....	This may be reworded as follow: 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 Fifty thousand per MW for the quantum of GNA one month prior to the start date of GNA...	Since GNA is sought by buyer and all charges in relation to GNA are born by the GNA allottee, hence forth the one time GNA charges from the generator may be considered as minimal token amount.