

STATE LOAD DESPATCH CENTRE

132Kv Gotri S/s Compound, Gotri Road, Vadodara-390021.

Telephone No.(0265) 2352103 Fax No.(0265) 2352019

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Ref No: GETCO/SLDC/OA/GNA/ 351

Date:15/02/2022

By Email/Post

To

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

Subject: Comments of Gujarat SLDC on Draft Central Electricity
Regulatory Commission (Connectivity and General Network
Access to the Inter-State Transmission System) regulations,
2021.

Ref.: Public Notice No.L-1/261/2021/CERC dtd 16.12.2021

Dear Sir,

In connection to the above subject and Ref. and workshop held by CERC on
10/02/2022, the comments/ suggestions/ observations of the Gujarat SLDC are
as under:

Para 17 of Draft regulation- reproduced as under:

1) 17. Eligibility for GNA

*"17.1. The following entities shall be eligible as Applicants to apply for grant of
GNA or for enhancement of the quantum of GNA:*

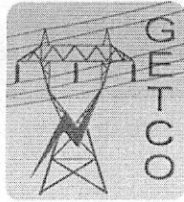
.....

(ii) A buying entity connected to intra-State transmission system;

....."

Here the process of GNA must be routed through STU i.e. consent of STU must be
mandatory as such buying entity is using Intra State Transmission Network.

- 2) As per Regulation 18.0, the deemed GNA has been granted based on last three
year ISTS drawl of the State. The ISTS drawl of the State is based on many
factors and in particular, last two years was with Covid-19 effect; the industrial
and commercial consumption was very low in comparison to earlier years and RE



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integration period so the drawl is not realistic representation of the State requirement over the years.

The State drawl varies quarterly due to seasonal effect and during peak and off peak hours so before deriving GNA, such variation shall be considered.

Please also note that the **NET DRAWL SCHEDULE** of a State is an arithmetical sum of Drawl schedule of all the Intra-state entities under LTA, MTOA & STOA and Injection Schedule of Intra-state Generators under LTA, MTOA & STOA for the entities outside of the State. Hence, it is clear that NET DRAWL SCHEDULE does not reflect the ACTUAL DRAWL SCHEDULE of a State.

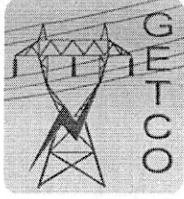
The true demand of the State is observed from Sept-21 onwards. Therefore, past three year i.e. F.Y. 18-19, 19-20 & 20-21 do not reflect the actual scenario of demand of a state. Also due to Fuel price (Coal & Gas), the interstate drawl is increased and reached up to ATC limit of the State during some part of the day. The LTA taken by State looking to State requirement for the years shall be honoured.

In view of above Gujarat suggests that in Regulation 18.0 the deemed GNA shall be equal to Approved LTA+MTOA of the state.

(It is understood that many stack holder may differ from above, so it is requested to give one chance to reduce Deemed GNA without financial implication to States.)

- 3) As per Regulation 20.0, any entity of State described in regulation 17.1(ii) & (iii) may apply for GNA to Nodal Agency. It is assumed that the STU consent is not required for such application by any State entities.

Gujarat suggests here that for any application of GNA as per Regulation 20.0, the consent of concern STU should be mandatory as the STU is Nodal agency for development of optimum transmission infrastructure in the State.



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- 4) In Regulation No. 31 **Standing Clearance for grant of T-GNA in sub-clause 31.3**, following Para must be added before the proviso in line with the CERC OA Regulation Amendment NO.-5.

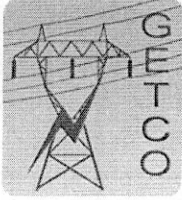
"In case the concerned RLDC or SLDC, as the case may be, finds that the application for standing clearance is incomplete or defective in any respect, it shall communicate the deficiency or defect to the applicant through NOAR within two (2) working days of receipt of application.

Provided that in cases where the concerned RLDC or SLDC as the case may be, has communicated any deficiency or defect in the application, the date of receipt of application shall be the date on which the application has been received duly completed after removing the deficiency or rectifying the defects, as the case may be".

- 5) The Transmission charge for T-GNA is as per Regulation-34. It is presumed that the rate for GNA and T-GNA are same. Gujarat suggests that the rate of T-GNA shall be slightly higher side than GNA in addition to priority in scheduling, as GNA is long-term responsibility in compare to T-GNA, which is limited time responsibility.
- 6) As per regulation 34.4© the transmission charges for T-GNA for use of intra state transmission system shall be settled directly by the power exchange with respective state Load Dispatch Centre under collective transaction.

The recovery of transmission charge for the use of Intra state transmission system in case of bilateral transaction is not mentioning same way as above. At present nodal RLDC collects, such charge and disburse it to State. On query for above it was informed that present practice of transmission charges collection and disbursement by RLDC would be discontinue and State has to create mechanism for the same. In this case, Gujarat SLDC requests to continue the present practice in new regulation also as RLDC being a Nodal agency for such bilateral transactions and most preferred entity for such bilateral transactions to recover all charges at one place.

GUJARAT ENERGY TRANSMISSION CORPORATION LIMITED



CIN No. U40100GJ1999SGC036018

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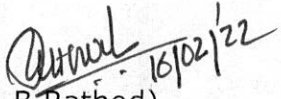
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It is requested to take above points in deliberation and discussion and finding a reliable solution, which will be helpful to the sector to fulfil its obligation towards stakeholders.

Thanking you,

With regards,


(A B Rathod)
Addl Chief Engineer (SLDC)