

Ref No. JPL/BD/CERC/2021-22/01

25/02/2022

To,  
The Secretary,  
Central Electricity Regulatory Commission,  
New Delhi

Kind Attn.: Shri Sanoj Kumar Jha

**Sub: Comments/suggestion on draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.**

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

Respected Sir,

Comments / suggestions / objections were invited from the stakeholders and interested persons in reference to the CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 vide the above referenced Public Notice. Jhabua Power as an ISGS is a direct stakeholder and therefore is desirous of offering its comments, keeping in view the far reaching consequences of the above regulations. Our comments/suggestion are enclosed in Annexure-I

We, therefore, request the Hon'ble Commission to kindly consider our comments / suggestions while finalizing the Draft Regulations.

Thanking You,  
Yours Sincerely,

  
Roopam Bansal  
(Senior Manager – Business Development)

**Jhabua Power Limited**

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**AVANTHA**  
GROUP COMPANY

**Annexure-1****Comments/suggestion on draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.**

<b>Clause No.</b>	<b>Comments</b>
<p>18.1 (f) Entity(ies) covered under Regulation 4.1 of these regulations where Long Term Access granted to such entity or to its identified buyer, under the Connectivity Regulations has become effective, shall be deemed to have been granted GNA equal to the quantum of such Long term Access, under these regulations.</p> <p><b><u>Grant of GNA to entities other than STU</u></b></p> <p>22.2 (a) Connectivity grantees covered under Regulation 4.1 of these regulations shall be <b>deemed to have been granted GNA, equal to the quantum of Connectivity</b> from the start date of Connectivity</p>	<p>Commission may clarify the following points.</p> <p>A Generating Plant is already connected to ISTS and having connectivity agreement with CTU of full capacity of the plant. However, 71% of the capacity is tied up with buyer under LTA and remaining quantum is traded under collective and Short term open access. In that case will the generator have to apply separately for the GNA to inject power under collective and STOA transaction or the generator shall be deemed to have been granted GNA for the total installed capacity of the plant.</p>
<p>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. <b>One lakh per MW</b> for the quantum of GNA one month prior to the start date of GNA.</p> <p>In case, such charges are not furnished by the entity within the specified timeline, the same shall be <b>recovered by encashment of Conn-BG1, Conn-BG2 and Conn-BG3 as required.</b> The proceeds of such onetime GNA charge shall be used for reducing Monthly Transmission Charges under the Sharing Regulations.</p>	<p>The GNA charges of 1 Lakh/ MW for the quantum of GNA will be the additional expenditure to the generating station and will be treated as Change in Law.</p> <p>Therefore, we would request the Hon'ble commission to waive off the GNA fees.</p>

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