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KARNATAKA POWER TRANSMISSION CORPORATION LIMITED

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No. KPTCL/B36/22481/2021-22/1849-1853

Dated: 25.02.2022

Encl : As per Letter -

The Secretary
Central Electricity Regulatory Commission,
3rd and 4th floor,
Chandralok Buliding,
36, Janpath, New Delhi-110001

Sir,

Sub: Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 - Regarding.

Ref: 1.CERC Public Notice. No.: L-1/261/2021/CERC dated 16.12.2021.
2. CERC Public Notice. No.: L-1/261/2021/CERC dated 16.02.2022.

Central Electricity Regulatory Commission vide public notification Dated: 16.12.2021 cited under reference(1) has sought Comments/Suggestions/Objections from the stakeholders on the Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 by 17th January 2022. At the request of the Stake holders, the last date for submission of comments/suggestions/ an objection has been extended till 25th February 2022 vide public notice dated: 16.02.2022 cited under reference (2).

In this regard, I am directed to enclose herewith the comments/suggestions of KPTCL on Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 for kind consideration and needful.

"This issues with approval of
The Managing Director, KPTCL"

Yours faithfully,


Financial Advisor
Regulatory Affairs

Annexure-1**Comments/Suggestions of KPTCL on the Draft CERC (Connectivity and General Network Access to the inter-state transmission system) Regulations, 2021****Preamble:**

The draft GNA regulation proposes to grant deemed GNA to a State based on the average of past three years annual drawl from CGS network. On this basis CERC has worked out grant of 4376 MW of deemed GNA to Karnataka . But the state of Karnataka is having variable demand and generation pattern in different quarters. During Q-1 State is having high demand & high ISTS drawl, in Q-2 the state is having moderate demand & moderate ISTS drawl, , in Q-3 state is having low demand & low ISTS drawl and in Q-4 state is having high demand & moderate ISTS drawl. The details of the same are mentioned in table below:

Table : 1

Period	Quarters	Maximum ISTS drawl in a time block during the Quarter in MW	Average of (maximum ISTS drawl in a time block in a day) during the Quarter in MW	Maximum State Demand the Quarter in MW	Minimum state demand during the Quarter in MW
2018-19	Q1	4777	3353	10688	4877
2018-19	Q2	4053	2641	10090	4623
2018-19	Q3	3932	2957	11233	5124
2018-19	Q4	5026	3946	12881	4623
2019-20	Q1	4805	3628	12688	4690
2019-20	Q2	4002	2753	10496	4423
2019-20	Q3	3536	2703	12803	4100
2019-20	Q4	4730	3858	13258	4100
2020-21	Q1	4454	3404	11516	5043
2020-21	Q2	4187	3042	10562	3861
2020-21	Q3	4438	3416	12102	4124
2020-21	Q4	6312	4701	14367	3861

The Table-1 above clearly indicates that the State demand and ISTS drawl is varying from one quarter to another quarter. At present, Karnataka State is having LTA & MTOA which is around 7300MW. However, Karnataka is utilizing an average to a extent of 4500MW only due to high internal RE sources which is around 15404 MW, State thermal (5020MW), State hydro (3798MW), IPP (1200MW). The internal generation source totaling to 25422MW out of 31280MW of overall capacity generation. State has to integrate such internal generation and

accordingly the drawl (GNA) varies form one quarter to another quarter. Therefore , it would be realistic to consider the GNA requirement based on the quantum of quarterly draws. In view of the above , the comments on draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 are furnished below:

Sl. No.	Clause No.	As per Draft CERC Connectivity and General Network Access to the inter-state transmission system, Regulation 2021	Comments /Suggestions of KPTCL
1.		General Network Access (GNA)	
	17.1 (i)	Eligibility for GNA- State Transmission Utility (STU) on behalf of distribution licensees connected to Intra-state transmission system and other intra-state entities are eligible as applicants to apply for grant of GNA or for enhancement of quantum of GNA.	At present the DISCOMs are directly transacting with CTU through a Bulk Power Transmission Agreement(BPTA). Further, 17(1) (iii) provides eligibility for Distribution entities to apply for GNA. Therefore the need for providing eligibility to STU to apply on behalf of Distribution licenses in the State may not be required. Hence the sub .clause (i) under regulation 17(1) may be deleted.
2.	18	Deemed Grant of GNA	
	18.1 (a)(b)	(a) GNA for a (i) State including intra-State entity(ies) and (ii) other drawee entities; shall be the average of „A“ for the financial years 2018- 19, 2019-20 and 2020-21: where, „A“ = {0.5 X maximum ISTS drawal in a time block during the year} + {0.5 X [average of (maximum ISTS drawal in a time block in a day) during the year]}	For the reasons mentioned in the preamble and based on the statistics provided under Table 1, the GNA computed as per clause 18.1 (a) of these Regulation given at Annexure-I shall be calculated quarterly instead of yearly since state drawl varies according to seasons. States like Karnataka, which are not scheduling their drawl up to quantum of LTA/MTOA granted, on account of higher internal generation during High RE season. The state may require less GNA based on drawl pattern of last three years

(b) GNA computed as per clause (a) of this Regulation is given at Annexure-I to these regulations.

quarterly. This would benefit the state in reducing their monthly transmission charges. The unutilized GNA can be utilized by other beneficiaries through T-GNA or Normal GNA. During high demand and low RE season, state may require high GNA; hence, seeking for high GNA or T-GNA during high drawl quarter can be avoided.

YEAR/ QUARTER	Q1	Q2	Q3	Q4
2018-19	4065	3347	3445	4486
2019-20	4216	3378	3120	4294
2020-21	3929	3614	3927	5506
Requested QUARTER GNA In (MW)	4070	3446	3497	4762

Table: 2

Note: The methodology used for calculation for GNA on quarterly basis instead of year as per clause 18.1(a), (b) of these draft regulation.

From the above Table-2, it is observed that Quarter-2 State may require only GNA of 3446MW and Quarter-4 state may require GNA of 4762MW, however as per these draft regulation allocation of GNA for Karnataka state is 4376MW for one year. During Quarter-2&3 state is having excess to an extent of 1000MW and Quarter-4 state is having shortfall to an extent of 400MW. Hence, GNA for States and other entities in Annexure-I of these regulation shall be declared on Quarterly basis instead of yearly basis.

	18.1 (C)	GNA for a State including intra-state entities as per clause (b) of this regulation shall be deemed to have been granted to STU of that State on behalf of such intra-state entities and shall remain valid until relinquished in accordance with these regulations.	For the reasons mentioned under 17(1)(i) above, GNA for a State shall be deemed to have been granted to the DISCOMs directly instead of STU.
3.	19	Application for Grant of additional GNA by STU	
	19.1	Within 3 months of coming into force of these regulations, STU may, on behalf of intra-State entities including distribution licensees, apply for additional GNA over and above the GNA deemed to have been granted under clauses (a) to (e) of Regulation 18.1 of these regulations, with entity-wise segregation indicating GNA within the region and from outside the region.	In this provision the words "STU may, on behalf of intra-State entities including distribution licensees" to be replaced with " the DISCOMs may" Further a Provision to surrender the expected unutilized GNA on quarterly basis may be added, so that it reduces additional transmission charges to beneficiaries, surrendered GNA can be utilized by Needy beneficiaries through T-GNA.
	19.2	STU, on behalf of intra-State entities including distribution licensees, may apply, once in a financial year (starting from the financial year following the financial year in which these regulations have become effective) by the month of September each year, for additional GNA for the next 3 (three) financial years, with entity-wise segregation indicating GNA within the region and from	Same as in 19.1 above

		outside the region, as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: Provided that such additional GNA quantum to be added in each of the next three financial years shall be applicable from a specified date of the respective financial year.	
4.	28	Application for grant of T-GNA	
	28.1	T-GNA may be applied for any period from 1 (one) time block and up to 11 (eleven) months.	The max time allowed for T GNA shall be restricted to three months or even less since forecasting demand/generation for a longer duration will not be accurate and the quantum is likely vary in a quarter. T-GNA Granted for 11 months may end up in unused quantum , which in turn may be be used by someone if it allowed for shorter duration i.e., 3 months or even less.
		Additional Clause proposed	It is requested to add a provision for the buying entities under T GNA , connected to intra state transmission system to pay the Transmission charges as per SERC Orders issued from time to time.


**Financial Advisor,
 Regulatory Affairs
 KPTCL**