

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

Sub: Comments and Suggestions on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021


Dear Sir/Ma'am,

This letter is with reference to the Draft Regulation published by CERC, bearing notification No. L-1/261/2021/CERC dated 16/12/2021 titled "Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021" which is aimed to provide non-discriminatory open access to the ISTS network. The Hon'ble Commission has called for stakeholders' comments and suggestions before finalizing the regulation.

Formed in 2005, Manikaran Power Limited (MPL) is a Trading Member of the Indian Energy Exchange (IEX) and Power Exchange India Ltd (PXIL). MPL is also a Category-I Inter-State Trading Licensee.

Under these circumstances, we put forward our comments and suggestions on the above-mentioned subject matter.

For Manikaran Power Limited


Vedant Sonkhiya
Legal Officer



S. No.	Provision	Comments/Suggestions
1	<p>Regulation 17- Eligibility for GNA</p> <p>Regulation 17(iv) Trading licensees engaged in cross border trade of electricity in terms of the Cross Border Regulations;</p>	<p>We suggest to allow traders other than having cross border transaction who are currently applying for MTOA should also be allowed to apply for GNA on behalf of Eligible entity.</p>
2.	<p>Regulation 18 Deemed Grant of GNA On the date, these regulations come into force,</p> <p>(a) GNA for a</p> <p>(i) State including intra-State entity(ies)</p> <p>(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]}</p> <p>Regulation 19 Application for Grant of additional GNA by STU 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.</p> <p>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 outside the region</p>	<p>We seek more clarity as to how will new applicants be granted the GNA quantum? Will it be treated as additional GNA quantum?</p>
3.	<p>Regulation 22 Grant of GNA The Nodal Agency shall process all applications received under Regulation 19.1 of these regulations together, within two months from last day of receipt of applications and grant additional GNA to STU based on</p>	<p>We suggest that there shall be a timeline defined to rectify any discrepancy in application for GNA. We seek further clarity as to the date of application after rectification is done. Will the date of application be the date when rectification is made or the date when the application was originally made?</p>

	<p>available transmission capacity, or on pro-rata basis, if necessary.</p> <p>The Nodal Agency shall grant additional GNA to STU based on applications received under Regulation 19.2 of these regulations by 31st March of the same financial year, keeping in view the available transmission capacity or timeline of augmentation, indicating the date from which such additional GNA shall be effective. GNA once granted shall remain valid until relinquished.</p>	<p>We seek clarity as to the timeline, by when rectification will be intimated by the nodal agency? And what will be the consequences if there is any delay?</p>
4.	<p>Regulation 25. Relinquishment of GNA For an entity covered under Regulation 17.1, GNA once granted can be relinquished, in full or in part, on payment of relinquishment charges in advance as per following:</p> <p>a) For an entity covered under clause (i) of Regulation 17.1 of these regulations, STU may relinquish GNA on behalf of identified intra-State entity. The relinquishment charges shall be equal to 60 times the transmission charges paid by such intra-State entity for the last billing month under the Sharing Regulations, corresponding to the relinquished quantum.</p>	<p>We suggest that the relinquishment charge is calculated based on the transmission charges of 60 months which should be reduced to one year/12 months as it is in existing regulation</p>
5.	<p>Regulation 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.</p>	<p>As opposed to the current regulation we comply with, does the applicant apply for T-GNA on monthly basis or is there an option to apply once for 11 months or less? And if so, does the applicant pay non-refundable fee (Application Fee) every single time?</p> <p>Since, under the current practice the NOC / Consent is provided by respective SLDC for 30 days only which will restrict the buyer to apply for T-GNA for one month only. Is there any provision for SLDCs to issue the NOC up to 11 months?</p>
6.	<p>Section 31 Standing Clearance for grant of T-GNA In case the concerned SLDC refuses to issue Standing Clearance on the grounds of non-existence of necessary infrastructure or unavailability of surplus transmission capacity in intra-State transmission network, such refusal shall be communicated to the Applicant through NOAR within the period of three (3) working days or seven (7) working days, as the case may be, from the date of</p>	<p>Please clarify, the start date of scheduling of power on T-GNA in case of non-acceptance and SLDC consent and deemed grant of standing clearance.</p>

	<p>receipt of the application along with reasons for such refusal:</p> <p>b) Provided that where the concerned SLDC has not communicated approval or refusal of application for Standing Clearance within the period of three working days or seven working days, as the case may be, the Standing Clearance shall be deemed to have been granted at the end of the next day after expiry of such period of three working days or seven working days, as the case may be, for a period for which such Standing Clearance was applied for or a period of 7 days, whichever is lower.</p>	
7.	<p>Regulation 32. Revision of T-GNA</p> <p>32.1. T-GNA granted under Exigency application category or under Advance application category for a period not exceeding one month cannot be revised. 32.2. T-GNA granted under Advance application category for a period of more than one month may be reduced for the balance period with a prior notice of one (1) month by the T-GNA grantee: Provided that applicable T-GNA charges for the quantum of T-GNA granted shall be payable for the notice period of one (1) month.</p>	<p>We suggest that revision of schedule in case of advance application in Bilateral under TGNA shall be made in 48 hours and not one month or else it will create a huge commercial impact on customer.</p> <p>We Seek clarity for the case of forced Outage of generating stations. Whether the revision will take place from 7th Time Block or not? If not, then what shall be the revision process?</p> <p>To allow revision for advance application under TGNA for less than 1 month.</p> <p>Under TGNA transmission, does the applicant need to submit schedules on everyday basis?</p> <p>Will the transmission charges be paid on scheduled quantum or the quantum specified in the application?</p>