



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

**Ref: NSEFI/CERC/2021-22/225**

**Date: 15.02.2022**

**To,**

**Shri Sanoj Kumar Jha,  
Hon'ble Secretary  
Central Electricity Regulatory Commission  
Janpath, New Delhi – 110 001**

**Subject: NSEFI comments and suggestions on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.**

**Ref: (1) Public Notice No. No. L-1/261/2021/CERC; Dt. 16.12.2021**

Dear Sir,

National Solar Energy Federation of India (NSEFI) is a non-profit organization with the objective of solar power development. It is an umbrella organization representing solar energy companies active along the whole photovoltaic value chain: project developers, manufacturers, engineering companies, financing institutions and other stakeholders. NSEFI is founded in 2013 by solar energy industry leaders with the vision to promote solar energy.

At the outset, we would like to thank the Hon'ble Commission for all its support and responsiveness to the Renewable Energy sector.

We are grateful to Hon'ble Commission, for releasing the 'Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021, referred as Ref no. (1) above and for inviting stakeholders' comments/suggestions. For the same, attached below you may find the comments (Annexure-I) from our members for your kind perusal.

Looking forward to your kind consideration.

**With Best Regards.**



**Subrahmanyam Pulipaka  
Chief Executive Officer  
National Solar Energy Federation of India**

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

### Annexure-I

#### NSEFI comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	Remarks
1.	<b>Definitions</b> (ah) "Renewable Hybrid Generating Station" or "RHGS" means a generating station based on hybrid of two or more renewable source(s) of energy with or without Energy Storage System, connected at the same inter-connection point;	We request the Hon'ble Commission to remove this definition of RHGS or rephrase it as "Co-located Renewable Hybrid Generating Station" or "CRHGS"	As per MNRE bidding Guidelines for procurement of power from Grid Connected Wind Solar Hybrid Projects, the wind and solar components of Hybrid project can be deployed at same or multiple locations subject to minimum injection capacity as 50 MW. We understand that the purpose of defining RHGS under GNA regulations is limited to the extent of Co-located hybrid projects. Therefore, we request Hon'ble Commission to either rephrase it as suggested here or remove it so that definition of Hybrid projects remain aligned with Central Government guidelines.
2.	Definition of Bilateral Transaction [Regulation 2(c)]:	We request the Hon'ble Commission to remove the word " <i>or at a Power Exchange</i> " from the definition of Bilateral Transaction to avoid any ambiguity with other existing regulations.	It is stated that as per Regulation 2(c) of Draft Connectivity and General Network Open Access Regulations 2021 ("Draft CGNA Regulations 2021"), the term "Bilateral

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



## NATIONAL SOLAR ENERGY FEDERATION OF INDIA

Regd. No. 362 / IV of 8 May, 2013

भारतीय सौर ऊर्जा महासंघ

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	Remarks
			Transaction” means and include exchange of power at power exchange. It is pertinent to mention herein that any transactions of buying and selling through the power exchange platform is a collective transaction, as defined under CERC Power Market Regulations 2021, and there is no direct price negotiation between the buying and selling entities.
3.	4.2. 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	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 up to 25% of capacity for which connectivity is granted to such entity subject to available capacity in transmission system	
4.	Regulation 5		It is stated that as per the procedure for grant of Connectivity to the eligible entities, the project developers are only required to submit the project location, installed capacity, furnish bank guarantee amongst others. The grant of connectivity will be basis these pre-

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	<u>Remarks</u>
			requisites. However, there may be instances where large scale project developers may apply and obtain the entire connectivity of a sub-station, in a single application, which is vitiating the scope and purpose of open access, as enshrined under Section 42 of the Electricity Act 2003. Therefore, it is hereby suggested that Hon'ble Commission may put any additional pre-condition in this regard.
5.	<p><b>5.1 Application for Grant of Connectivity</b> An Applicant, which is a generating station including REGS, shall apply for grant of Connectivity to the Nodal Agency for the quantum equal to the installed capacity of the generating station:</p> <p>Provided that if such an Applicant already has Connectivity to intra-State transmission system for part of its installed capacity, it may apply for Connectivity to the ISTS for a quantum not exceeding the balance of the installed capacity;</p> <p>Provided further that if such an Applicant is a Renewable Hybrid Generating Station, it may apply</p>	<p><b>5.1 Application for Grant of Connectivity</b> An Applicant, which is a generating station <del>including REGS</del>, shall apply for grant of Connectivity to the Nodal Agency for the quantum equal to the installed capacity of the generating station:</p> <p>Provided that if such an Applicant already has Connectivity to intra-State transmission system for part of its installed capacity it may apply for Connectivity to the ISTS for a quantum not exceeding the balance capacity.</p> <p>Provided further that if such an Applicant is a <u>REGS or</u> Renewable Hybrid Generating Station, it may apply for grant of Connectivity</p>	Regulations permit REGS with ESS to apply for connectivity for a quantum less than or equal to the installed capacity considering intermittent nature of generation for renewable sources and also to promote optimum utilization of EHV infra. The same principle might apply for REGS as well, as these sources don't generate power up to the installed capacity during major part of day/night and hence sub optimal utilization of EHV infrastructure. We suggest that REGS should also be allowed to apply for connectivity for a quantum less than or equal to the installed capacity.

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

<b>S.N.</b>	<b>Draft Regulation's Existing Clause</b>	<b>Proposed Regulation</b>	<b>Remarks</b>
	for grant of Connectivity for a quantum less than or equal to the installed capacity	for a quantum less than or equal to the installed capacity.	However, injection in grid should not exceed quantum of connectivity.
<b>6.</b>	<b>5.2</b> Notwithstanding anything contained in Regulation 5.1, a generating station, with prior approval of CTU, shall be eligible to add, within the quantum of Connectivity granted to it, additional generation capacity, including ESS, 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, provided that for such additional generation capacity, the said generating station shall be responsible for compliance with the Grid Code and other regulations of the Central Commission	<b>5.2</b> Notwithstanding anything contained in Regulation 5.1, a generating station, with prior approval of CTU, shall be eligible to add, within the quantum of Connectivity granted to it, additional generation capacity, including ESS, and for this purpose, the generating station <del>shall inform the CTU in writing apply to CTU, along with non-refundable application fee of Rs 3 lakh along with applicable taxes;</del> Provided that for such additional generation capacity, the said generating station shall be responsible for compliance with the Grid Code and other regulations of the Central Commission	If a generating company wishes to add additional generation capacity not exceeding the granted connectivity, then there should not be the requirement of submitting additional application fees. Since, there are no requirement of system enhancement or additional system studies as the connectivity quantum remains unchanged.
<b>7.</b>	<b>5.8</b> The application for grant of Connectivity shall contain, inter alia, the following details, as applicable, duly supported with relevant affidavit, as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1:  (vi) Registration Number along with certificate issued by the CEA Registry;	<b>5.8</b> The application for grant of Connectivity shall contain, inter alia, the following details, as applicable, duly supported with relevant affidavit, as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1:  ..... <del>(vi) Registration Number along with certificate issued by the CEA Registry;</del>	The requirement of furnishing the registration number be included at the time of signing of the Connectivity Agreement and not at the stage of connectivity application.

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

<b>S.N.</b>	<b>Draft Regulation's Existing Clause</b>	<b>Proposed Regulation</b>	<b>Remarks</b>
8.	<p>6.1 Provided that the existing ISTS for the purpose of this Regulation shall include transmission, system which has been awarded for implementation, as on the last day of the month in which application for grant of Connectivity complete in all respects, has been received:</p> <p>Provided further that if any additional transmission system gets awarded for implementation before completion of interconnection study, such additional transmission system shall also be considered as existing ISTS</p>	<p>Existing ISTS: The system commissioned till the last date of the month in which entity submit its application- This will make entire system as ATS and accordingly BG will be apportioned between all the applicants.</p>	<p>There should not be any difference between existing system or ATS as in both cases, applicant would require/utilise transmission infrastructure for evacuation of power. Further, it would not be fair or equitable to seek BG equivalent to cost of ATS from an applicant who seeks connectivity just before award of transmission system while other applicant who may apply for connectivity subsequent to award would require giving a BG of only Rs. 2 lakh/MW.</p>
9.	<p>6.2 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).</p>	<p>Any augmentation required, <b>excluding common Transmission System</b> and 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).</p>	<p>ATS for the applicant should be exclusive of the common transmission system.</p>
10.	<p><b>7. In-principle Grant of Connectivity by the Nodal Agency</b></p> <p>7.1 In the event the Nodal Agency after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that no ATS is required, the Nodal Agency shall intimate in principle grant of Connectivity to the Applicant within 30 days from the last day of the</p>	<p><b>7. In-principle Grant of Connectivity by the Nodal Agency</b></p> <p>7.1 In the event the Nodal Agency after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that no ATS is required, the Nodal Agency shall intimate in principle grant of Connectivity to the Applicant</p>	<p>As per Regulation 8.1 and 8.2, the applicant covered under Regulation 6.1 for which ATS is not required, on receipt of in-principle intimation under Regulation 7.1 is required to submit Conn-BG1, Conn-BG2 and</p>

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	Remarks
	<p>month in which the application had been received along with details such as terminal bay(s), already available or to be developed under ISTS through CTU, and minimum design features for dedicated transmission lines to be constructed by the Applicant.</p> <p>7.2 In case the Nodal Agency, after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that ATS is required, the Nodal Agency shall intimate in-principle grant of Connectivity to the Applicant within 60 days from the last day of the month in which the application had been received:</p> <p>Provided that intimation for in-principle grant of Connectivity shall include the ATS and terminal bay(s), estimated cost of such ATS and terminal bay(s), minimum design features for dedicated transmission lines to be constructed by the Applicant and the likely date of start of Connectivity.</p>	<p>within 30 days from the last day of the month in which the application had been received along with details such as terminal bay(s), already available or to be developed under ISTS through CTU, <b>Substation location (confirmed in case of operation and under construction and tentative in case of proposed)</b> and minimum design features for dedicated transmission lines to be constructed by the Applicant.</p> <p>7.2 In case the Nodal Agency, after the interconnection study undertaken in accordance with Regulation 6.1 of these regulations, determines that ATS is required, the Nodal Agency shall intimate in-principle grant of Connectivity to the Applicant within 60 days from the last day of the month in which the application had been received:</p> <p>Provided that intimation for in-principle grant of Connectivity shall include the ATS and <b>tentative location of Substation</b>, terminal bay(s), estimated cost of such ATS and terminal bay(s) <b>to be provided in (INR XX/MW)</b>, minimum design features for dedicated transmission lines to be constructed by the Applicant and the likely date of start of Connectivity:</p>	<p>Conn-BG3 within 1 month. Location of the substation is the most basic and essential requirement for an applicant before committing a financial exposure in the form of Bank guarantees.</p> <p>The applicant under 6.1 requiring ATS would receive an in-principle grant of connectivity under Regulation 7.2 and as per Regulation 8.3 (a) will have to provide Conn-BG1. The applicant has to commit a BG equal to INR 50 lakhs without even knowing the tentative location of the substation. Moreover, according to Regulation 8.3 (b) when the final estimate of Conn-BG2 is informed to the applicant, the tentative location of the SS is still not communicated and as per Regulation 8.3 (e), the applicant is expected to submit Conn-BG2. The applicant is expected to bear huge financial risk in the form of Conn-BG1 and Conn-BG2</p>

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



## NATIONAL SOLAR ENERGY FEDERATION OF INDIA

Regd. No. 362 / IV of 8 May, 2013

भारतीय सौर ऊर्जा महासंघ

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	<u>Remarks</u>
		<p>Provided that the Nodal Agency shall plan the system such that maximum length of dedicated transmission line shall not exceed 40 km if the applicant project capacity is &gt;1000 MW and within 30 kms if the applicant project capacity is &lt;1000 MW from the switchyard of the REGS till the Substation location of the transmission licensee.</p>	<p>without even knowing the tentative location of the substation. We suggest that the tentative location should be made part of in principle intimation or before any financial commitment is expected from the applicant.</p> <p>The Conn-BG2 amount should be limited to the immediate additional system required and must not include the cost of upstream/ downstream elements. The ATS estimate can be standardized like BG for the terminal Bay (INR XX /MW of project capacity) so that it will be linked to capacity of REGS. Otherwise, a typical 300 MW or 3000 MW applicant has to bear the same ATS</p> <p>Regulation 8(8) of the 2009 Connectivity Regulations provides for a restriction on the length of dedicated transmission line that shall be planned by CTU. For a REGS the length of the DTL is a critical cost component and has commercial implication. Connectivity location which is far away from the identified REGS project site will</p>

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)





**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	<u>Remarks</u>
			render a good project unviable. The proviso of 2009 regulations enabled best sites (w.r.t resource intensity, nature of land revenue or private and cost) to be employed for siting the RE plant and the transmission system was pulled towards the RE resource sites. As renewable sources work at 1/3 of thermal source of generation, therefore a feasible EVH line length of REGS would also be 1/3 <sup>rd</sup> of thermal power project i.e., 1/3 <sup>rd</sup> of 100 KM (i.e., ~30 kms) considered in Connectivity Regulation 2009.
11.	<p><b>8.3</b> For cases covered under Regulation 7.2 of these regulations, the following procedure shall be followed:</p> <p>(a) The entity that has been intimated in-principle grant of Connectivity, shall submit its consent for execution of ATS and terminal bay(s), as intimated under Regulation 7.2 of these regulations, along with Conn-BG1, within one month of intimation of in-principle grant of Connectivity, failing which the application for Connectivity shall be closed and application fee shall be forfeited.</p>	<p><b>8.3</b> For cases covered under Regulation 7.2 of these regulations, the following procedure shall be followed:</p> <p>(a) The entity that has been intimated in-principle grant of Connectivity, shall submit its consent for execution of ATS and terminal bay(s), as intimated under Regulation 7.2 of these regulations, <del>along with Conn-BG1</del>, within one month of intimation of in-principle grant of Connectivity, failing which the application for Connectivity shall be closed and application fee shall be forfeited.</p>	Without knowing the tentative location, a commitment of Conn-BG1 should be removed, or the tentative location of s/s should be provided along with in principle intimation under Regulation 7.2.
12.	<p><b>8.3 (b)</b> The Nodal Agency, within 6 (six) months of furnishing of Conn-BG1 as per clause (a) of this Regulation, shall intimate to such entity, (i) amount</p>	<p>8.3 (b) The Nodal Agency, within 6 (six) months of furnishing of Conn-BG1 as per clause (a) of this Regulation, shall intimate to</p>	The final ATS cost should not be lower than 10% of the estimate provided in the in-principle

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	<u>Remarks</u>
	<p>of Conn-BG2 to be furnished towards ATS and terminal bay(s), which shall not exceed the estimated cost intimated under Regulation 7.2 of these regulations, (ii) the timeline for completion of ATS and terminal bay(s), and (iii) firm date of start of Connectivity.</p>	<p>such entity, (i) amount of Conn-BG2 to be furnished towards ATS and terminal bay(s) <b>in INR (XX/MW)</b>, which shall not exceed the estimated cost intimated under Regulation 7.2 of these regulations, (ii) the timeline for completion of ATS and terminal bay(s), and (iii) firm date of start of Connectivity <b>(iv) Substation tentative location.</b></p> <p><b>Provided that, Conn-BG1 submitted in line with Regulation 8.3 (a) shall be returned if the tentative Sub-station location is not feasible for the applicant.</b></p> <p><b>Provided further that if such ATS and terminal bay(s) are planned for more than one entity (ATS planned for 1 GW vs application of 300 MW), Conn-BG2 shall be furnished in proportion to the quantum of Connectivity applied for by such entities.</b></p>	<p>intimation. This would avoid non-serious estimation of ATS cost at the time of in principle intimation stage. High tentative ATS cost (overly budgeted) will not provide realistic cost to the applicant who would be using the cost estimates for participating in on-going tenders (considering high gestation period between in-principle and final grant of connectivity).</p> <p>In addition to ATS cost, the cost of dedicated EHV infra is also an important cost driver for the applicant to make decision, therefore, the applicant should be given an opportunity to withdraw the in-principle connectivity if the SS location informed after 6 months of system studies is not feasible for the project.</p> <p>The amount of Conn-BG2 should be proportional to the connectivity granted at the proposed S/s. The first applicant to a proposed s/s should not be burdened with Conn-BG2</p>

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	<u>Remarks</u>
			<p>equivalent to the complete cost of the ATS.</p> <p>The Conn-BG2 amount should be limited to the immediate additional system required and must not include the cost of upstream/ downstream elements. The ATS estimate can be standardized like Bay BG so that it will be linked to capacity of REGS. Otherwise, a typical 300 MW or 3000 MW applicant has to bear the same ATS cost as Con-BG2.</p>
13.	<p><b>8.3 (c)</b> In the event the Nodal Agency, does not intimate the details as per clause (b) of this Regulation within 6 (six) months, the Nodal Agency shall furnish the reasons for such non-intimation to the entity with a copy to the Central Commission within one month of expiry of such period of six months with a probable date by which the details of Conn-BG2 and such timeline shall be furnished:</p> <p>Provided that in the event of non-intimation by Nodal Agency within six months, the entity shall have the option of withdrawing the application for Connectivity and in such a case, the Conn-BG1 shall be returned within one month of exercising option of withdrawal by the entity and application shall be closed.</p>	<p>8.3 (c) In the event the Nodal Agency, does not intimate the details as per clause (b) of this Regulation within 6 (six) months, the Nodal Agency shall furnish the reasons for such non-intimation to the entity with a copy to the Central Commission within one month of expiry of such period of six months with a probable date by which the details of Conn-BG2 and such timeline shall be furnished, <b>provided that the revised date should not exceed more than 3 months:</b></p> <p>Provided that in the event of non-intimation by Nodal Agency within six months, the entity shall have the option of withdrawing the application for Connectivity and in such a case,</p>	<p>CTU should have a universal obligation to build an infrastructure if request by an applicant and within a well-defined stipulated timeline. Nine months are reasonably long timeline for PGCIL to provide the required information related to ATS.</p>

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	<u>Remarks</u>
		the Conn-BG1, shall be returned within one month of exercising option of withdrawal by the entity and application shall be closed.	
14.	8.3 d) The amount for which Conn-BG2 is to be furnished as per clause (b) of this Regulation, shall be equal to estimated cost of ATS and terminal bay(s) and the timeline for completion of ATS and terminal bay(s) shall be based on the scheduled date of commercial operation for such ATS and terminal bay(s).	<p>The amount for which Conn-BG2 is to be furnished as per clause (b) of this Regulation, shall be as under:</p> <p>i) For Project capacity having PPA - equal to Conn-BG2 towards terminal bay clause 8.2 (a) of this Regulation.</p> <p>ii) For untied Project capacity - equal to Conn-BG2 towards terminal bay clause 8.2 (a) of this Regulation and Rs. 2 Lakh/MW.</p> <p>OR</p> <p>d) The amount for which Conn-BG2 is to be furnished as per clause (b) of this Regulation, shall be equal to estimated cost of <u>ATS ( Rs. /MW)</u> and terminal bay(s) and the timeline for completion of ATS and terminal bay(s) shall be based on the scheduled date of commercial operation for such ATS and terminal bay(s).</p>	<p>There must be an upper ceiling of estimated cost of ATS on per MW basis</p> <p>Conn-BG2 should be split into two components and taken separately. One component is towards the terminal bays and the other component towards the ATS required. A REGS developer may be willing to construct the terminal bays at its own cost and willing to submit BG for the proposed ATS minus the terminal bays.</p>
15	<b>Additional Clause</b> LTA (tied up capacity) is effective; however, Generation Project is not operational and paying	Such Generating assets shall be allowed to convert their LTA and connectivity to GNA and shall comply with BG requirements as mentioned in these regulations	

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

<b>S.N.</b>	<b>Draft Regulation's Existing Clause</b>	<b>Proposed Regulation</b>	<b>Remarks</b>
	penalty/liable for penalty for delay as per present regime.		
<b>16</b>	<p><b>9. Final Grant of Connectivity by the Nodal Agency</b></p> <p><b>9.1.</b> Within 15 days of receipt of Conn-BG2 and Conn-BG3, as applicable, the Nodal Agency shall intimate the final grant of Connectivity to the entity that has been intimated in-principle grant of Connectivity. The intimation shall contain, inter alia, the following:</p> <p>.....</p> <p>(d) In case of a proposed ISTS sub-station the tentative coordinates and the scheduled date of commercial operation of such ISTS substation</p>		Refer our comment in section (3) above. With respect to Regulation 7.1 and where Substation are at proposal stage, as per Regulation 8.3 (c) the applicant has to submit Conn-BG1, Conn-BG2 and Conn-BG3 even before knowing the Substation location. This deprives the applicant of a critical information for making a business decision.
<b>17</b>	<p><b>10.1.</b> 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.</p>		Generator data may not be available at this early stage as equipment (WTGs, Transformers etc) will not be finalised by this time. Request to exempt this condition for signing of Connectivity Agreement (may be inserted 3-6 months SCOD) or execute this agreement 90 days prior to SCOD. CTU may execute transmission agreement post award of final connectivity and Connectivity Agreement 90 days before SCOD.
<b>18</b>	<p><b>10.5.</b> Where Connectivity is granted at a proposed ISTS sub-station, the Nodal Agency, shall confirm the final coordinates within 2 months of signing of</p>		Please keep the option to developers to withdraw their application if the final location proposed is not acceptable. In

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	Remarks
	the Connectivity Agreement and such coordinates shall not be outside the radius of 5 km of the tentative coordinates already intimated.		that case, CTU to return BGs submitted without any penalty.
19	10.6 Provided that where no construction of ATS or terminal bays has been awarded for implementation, Conn-BG2 shall be returned within a month of such revocation.	Provided that where no construction of ATS and/or terminal bays has been awarded for implementation, <b>Conn-BG2 and Conn-BG3 shall be returned within a month of such revocation.</b>	Conn BG 3 should also be returned to the entities if terminal bays are not awarded.
20	<b>10.7</b> The Connectivity Agreement, inter alia, shall include the following and other details as may be stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: (a) Details of the allocated terminal bay(s) at ISTS sub-station subject to provisions of Regulation 10.5 of these regulations; (b) Start date of Connectivity; and (c) Provision that in case of non-payment of transmission charges under Regulation 13 of the Sharing Regulations for more than 3 months from the <b>due date</b> , the same may be recovered by encashing Conn-BG1, Conn-BG2 and Conn-BG3, as required as per provision of Regulation 16.3 of these regulations.	To be removed.	Connectivity grantee under regulation 8 of these regulations are already furnishing Conn BGs and procurers are made eligible for availing GNA. Further, the concept of GNA is to made liable Generating stations for the cost of ATS or terminal bay made by licensee while transmission charges for GNA shall be borne by procurer. In case of any default in terms of connectivity by entities covered under Reg 4.1 of these regulations then CTU can encash the Conn BGs submitted by such entities to recover the cost of ATS. Therefore, there is no occasion for recovery of transmission charges from Generating stations as their BGs will be encashed in case of default and procurer can still avail power towards such GNA from some other mode.

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	<u>Remarks</u>
		<p><b>OR if the above is not suitable....</b></p> <p><b>10.7</b> The Connectivity Agreement, inter alia, shall include the following and other details as may be stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: (a) Details of the allocated terminal bay(s) at ISTS sub-station subject to provisions of Regulation 10.5 of these regulations; (b) Start date of Connectivity; and (c) Provision that in case of non-payment of transmission charges under Regulation 13 of the Sharing Regulations for more than 6 months from the due date, the same may be recovered by encashing Conn-BG1, Conn-BG2 and Conn-BG3, as required as per provision of Regulation 16.3 of these regulations.</p>	<p>In view of the above, we request Hon'ble Commission to remove this provision so that the objective of GNA regulations can be aligned.</p> <p>a) A period of 6 months will align it with clause 11.2 (A) (b) REVISED PROCEDURE FOR "GRANT OF CONNECTIVITY TO PROJECTS BASED ON RENEWABLE SOURCES TO INTER-STATE TRANSMISSION SYSTEM"</p> <p>b) What is the "due date"? please define. And in the cases of transition of connectivity, what will be the due period?</p>
21	12.4. Provided also that in such case of revocation of Connectivity, the Connectivity grantee shall	12.4 Provided also that in such case of revocation of Connectivity, <del>the Connectivity grantee shall</del>	Dismantling of a Bay is not the most optimum solution. CTU should open that Bay for other interested applicant

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	Remarks
	dismantle the terminal bay within 3 months failing which the CTU may utilise the bay for some other Connectivity applicant.	<del>dismantle the terminal bay within 3 months failing which</del> the CTU may utilise the bay for some other applicant. <b>If connectivity is granted to a New applicant, then new applicant will reimburse the cost of constructing the bay to original applicant within 1 month of signing the connectivity agreement with CTU.</b>	and in case connectivity is granted, the CTU determined cost of Bay should be reimbursed to the initial grantee.
22	12.5. In case of an entity covered under Regulation 17.1(iii), the line to connect such an entity to the ISTS and necessary augmentation for providing connection to the ISTS, shall be constructed and maintained by a licensee at the cost of such entity	12.5. In case of an entity covered under Regulation 17.1(iii), the line to connect such an entity to the ISTS and necessary augmentation for providing connection to the ISTS, shall be constructed, and maintained by <b>any ISTS transmission licensee</b> at the cost of such entity.  Provided that such entity can also form a SPV and take transmission license to construct DTL.	Hon'ble Commission in its order dated 05.01.2022 in petition number 124/MP/2021 has allowed Petitioner to approach either PGCIL or any other licensee to construct DTL at the cost of Petitioner. The entity should also be given option to take transmission license and form DTL.
23	15.1 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	15.1 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  <b>Provided that Parent company should have at least 49% of the shareholding in its subsidiary</b>	
24	<b>16. Treatment of Connectivity Bank Guarantee</b> <b>16.2</b> Conn-BG2 and Conn-BG3 shall be returned in five equal parts over five years corresponding to the	<b>16.2</b> Conn-BG2 and Conn-BG3 shall be returned <b>within one year</b> of the generation capacity	If the project is commissioned and revenue is accruing, there is no reason that transmission charges are not paid (a recourse mechanism should be

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)





**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	Remarks
	generation capacity which has been declared under commercial operation by the Connectivity grantee	<p>which has been declared under commercial operation by the Connectivity grantee</p> <p>OR the same can be modified as under</p> <p>16.2. Conn-BG2 and Conn-BG3 shall be returned in five equal parts over five years corresponding to the generation capacity which has been declared under commercial operation by the Connectivity grantee.</p> <p><b>Provided that Conn-BG2 and Conn-BG3 of Renewable Energy Generating stations shall be returned within 30 days after commissioning of the full capacity</b></p>	considered). Additional financial burden on RE project for 5 years is not justifiable
25	<p><b>16.3</b></p> <p>In case of non-payment of transmission charges under Regulation 13 of the Sharing Regulations for more than 3 months from the due date, such transmission charges shall be recovered by encashing Conn-BG1 (if subsisting), Conn-BG2 and Conn-BG3, as required. Connectivity shall be revoked from the date when Conn-BG2 is not sufficient to cover transmission charges under Regulation 13 of the Sharing Regulations.</p>	<p><b>16.3</b></p> <p>In case of non-payment of transmission charges under Regulation 13 of the Sharing Regulations for more than 3 months from the due date, such transmission charges shall be recovered by encashing Conn-BG1 (if subsisting), Conn-BG2 and Conn-BG3, as required. Connectivity shall be revoked from the date when Conn-BG2 <u>and Con BG-3</u> are not sufficient to cover transmission charges under Regulation 13 of the Sharing Regulations.</p>	<p>Connectivity should only be revoked only if quantum of Conn-BG1, Conn-BG2 and Conn-BG3 (if applicable) is exhausted.</p> <p>The transmission user must be given at least a notice for making payment of transmission charges, within a period of 3 months' failure to which PGCIL will be at liberty to invoke the bank</p>

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	<u>Remarks</u>
			guarantee for recovery of monthly transmission charges. It is to be noted that encashment of bank guarantee must be treated as an alternative last remedy and that transmission user should be given prior notice to make payment of transmission charges.
26	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 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	This provision needs clarity whether the additional GNA sought by STU by end of September month of every financial year will be applicable for next three financial years or will it be perpetual.	
27	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. one lakh per MW for the quantum of GNA one month prior to the start date of GNA. In case, such charges are not	(d) Entities covered under <del>Regulation 4.1 and</del> clause (iii) of Regulation 17.1 of these regulations <b>who will be granted GNA after notification of these regulations</b> shall furnish one-time GNA charge for Rs. one lakh per MW for the quantum of GNA one month prior to the	Conn -BG1, Conn-BG2 & Conn-BG3 have been kept as a security amount for recovery of Transmission charges. This one-time GNA charge is like a tax and would lead to additional financial burden to the new

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	Remarks
	furnished by the entity within the specified timeline, the same shall be recovered by encashment of Conn BG1, Conn-BG2 and Conn-BG3 as required. The proceeds of such on time GNA charge shall be used for reducing Monthly Transmission Charges under the Sharing Regulations.	start date of GNA. In case, such charges are not furnished by the entity within the specified timeline, <del>same shall be recovered by encashment of Conn-BG1, Conn-BG2 and Conn-BG3 as required</del> <b>the GNA shall be cancelled with payment of relinquishment charges as per Regulation 25</b>	connectivity grantee which is unjustifiable Further, In the workshop conducted by CERC, it was informed that only new entities who will be granted GNA after notification of these regulations will be required to submit one-time GNA charges and will not be levied on entities which are already granted connectivity/LTA. We request Hon'ble Commission to capture the same in the regulation.
28	23. Use of GNA by other GNA grantee(s) 23.1. An entity covered under Regulation 17.1 which is a GNA grantee, may authorise other entities covered under Regulation 17.1 which are GNA grantee(s), to use its GNA, in full or in part, with prior approval of the Nodal Agency, for a period not exceeding 1 (one) year at a time on mutually agreed terms and conditions	We request Hon'ble Commission to clarify whether GNA grantee located in region A can authorise other entities located in different regions i.e region B or C, to use its GNA or can only authorise entity of same region to use its GNA.	In the workshop conducted by CERC, it was communicated that transfer of GNA between the entities will be allowed within the same region. We request Hon'ble Commission to capture the same in the regulation.
29	<b>Additional Comment:</b>  Separate buckets for RE and non-RE GNA	The GNA granted to entities under regulation 17.1 shall be categorised in two parts: RE and non-RE GNA so that any non-RE power availed by procurer can be settled/accounted from the limit of non-RE GNA only.	In the proposed GNA mechanism, if a state or any other procurer has GNA for availing RE for which transmission charges are waived off, it might be possible that during non-RE generation time same GNA can be used for sourcing non-RE power

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



## NATIONAL SOLAR ENERGY FEDERATION OF INDIA

Regd. No. 362 / IV of 8 May, 2013

भारतीय सौर ऊर्जा महासंघ

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	Remarks
		The nodal agency shall publish details of GNA availed by procurer and categorise in two parts: RE-GNA and non-RE GNA for the purpose of calculating transmission charges and TDR.	(mostly thermal) and as the GNA limit will not get breached, there will be no transmission charges for procuring non-RE power. Therefore, we request Hon'ble Commission to separate the GNA in two buckets i.e. RE and non-RE GNA and accounting of transmission charges and TDR be made in these respective categories to ensure that non-RE power doesn't get any waiver of transmission charges.
30	Relinquishment of General Network Access [Regulation 25]:		It is submitted that as per the aforesaid draft regulations, GNA granted to entities which are covered under Regulations 17 will be eligible for relinquishing the access rights so granted. It is stated that generating companies are not covered under the ambit of Regulations 17. In that case, the generating companies will not be in a position to relinquish the access rights granted by PGCIL. Therefore, we request Hon'ble Commission to clarify the same and may include "generating companies" within the scope of Regulation 17 of the draft GNA Regulations 2021.

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

<b>S.N.</b>	<b>Draft Regulation's Existing Clause</b>	<b>Proposed Regulation</b>	<b>Remarks</b>
31	<p>26. Eligibility for Temporary GNA</p> <p>26.1. The following entities shall be eligible as Applicants to apply for T-GNA to ISTS:</p> <p>(iv) Generating station including Renewable Energy Generating Station for meeting its auxiliary consumption or start-up power or for meeting its supply obligations in terms of clause (3) of Regulation 6 of the Power Market Regulations</p>	<p>26. Eligibility for Temporary GNA</p> <p>26.1. The following entities shall be eligible as Applicants to apply for T-GNA to ISTS:</p> <p>(iv) Generating station including Renewable Energy Generating Station for meeting its auxiliary consumption or start-up power <del>or for meeting its supply obligations in terms of clause (3) of Regulation 6 of the Power Market Regulations</del></p>	<p>Under GNA regime, procurer can source power from any contracts/mode upto the limit of GNA. Therefore, In case of any forced outage of generating station, the supply obligations can be meet by sourcing power from any other source i.e. bilateral or Collective (RTM etc) in the GNA limit of the respective buyer and there is no need for Generating station to avail T-GNA.</p> <p>Therefore, we request Hon'ble Commission to modify the regulation as suggested herein.</p>
32	<p><b>32. Revision of T-GNA</b></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</p> <p>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>32. Revision of T-GNA</p> <p>32.1. T-GNA granted under Exigency application category <del>or under Advance application category for a period not exceeding one month</del> cannot be revised</p> <p>32.2. T-GNA granted under Advance application category for a period of <b>more than 02 days may be reduced for the balance period with a prior notice of one (02) days by the T-GNA grantee</b> Provided that applicable T-GNA charges for the quantum of T-GNA granted shall be payable for the notice period of one 02 days</p>	<p>T-GNA under Advance application should be allowed to revise with a prior notice period of 02 days as such corridor can be allotted to other T-GNA grantees under Exigency application after 02 days' time period. Existing regulation also provides option to STOA grantee to avail downward revision provision after a period of 02 days' time period.</p>

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	Remarks
			Therefore, we request Hon'ble commission to keep the provision as it is for Advance T-GNA applications.
33	Arrangement for Transition [Regulation 37]	<p>The following provision is suggested to be inserted after Regulation 37.3:</p> <p><i>“Provided that for surrendering any access rights granted to any transmission user or applicant under the earlier Connectivity and Open Access Regulations 2009, the relinquishment charges shall not be made applicable for such surrendering of open access capacity. Provided further that such application has to made within 1 month from the effective date of this Regulation.”</i></p>	It is submitted that as per Regulation 37 of Draft CGNA Regulations 2021, transition from the existing connectivity and open access application to the Draft CGNA Regulations is allowed either by conversion or surrendering of existing application or grant. However, from a bare perusal of Regulations 37.3, it is not clarified as to whether the transmission user including the generating company shall be liable for payment of relinquishment charges in case such user surrenders the open access rights already granted under the Principal Regulations 2009. Therefore, we request Hon'ble commission to kindly clarify the same and the said provision may be inserted.
34	37.2. If Connectivity has been granted but Long-Term Access has not been granted in accordance with the Connectivity Regulations and Connectivity is yet to become effective as on the date of coming into effect of these regulations, the same shall be treated as under: (a) The entity shall have the option of, either (i) to convert the Connectivity granted under the	37.2. If Connectivity has been granted but Long-Term Access has not been granted in accordance with the Connectivity Regulations and Connectivity is yet to become effective as on the date of coming into effect of these regulations, the same shall be treated as under: (a) The entity shall have the option of, either (i) to convert the Connectivity granted under the	Under 2009 Connectivity Regulations and subsequent amendments, the connectivity grantee has taken exposure of INR 3.5 Cr (Conn BG 1 and Conn BG2) and in case the milestones are not met as per the current regulations (readiness of EHV infra within SCoD + 6 months), the

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	<u>Remarks</u>
	<p>Connectivity Regulations as Connectivity made under these Regulations complying with the requirements under these regulations, or (ii) to surrender such Connectivity.</p> <p>(b) Such option under clause (a) of this Regulation shall be exercised by the applicant within one month of coming into effect of these Regulations, failing which the Connectivity granted under the Connectivity Regulations shall be considered as surrendered</p> <p>c) In case the Connectivity is surrendered in terms of option (ii) of clause (a) of this regulation or clause (b) of this regulation, Conn-BG1 and Conn-BG2, if any, furnished under the Connectivity Regulations shall be returned.</p> <p>Provided that in case the construction of terminal bay has been awarded for implementation under ISTS through CTU, Conn-BG2 furnished under the Connectivity Regulations shall be encashed.</p>	<p>Connectivity Regulations as Connectivity made under these Regulations complying with the requirements under these regulations, or (ii) to surrender such Connectivity.</p> <p>(b) Such option under clause (a) of this Regulation shall be exercised by the applicant within one month of coming into effect of these Regulations, failing which the Connectivity granted under the Connectivity Regulations shall be considered as surrendered</p> <p>c) In case the Connectivity is surrendered in terms of option (ii) of clause (a) of this regulation <del>or clause (b) of this regulation</del>, Conn-BG1 and Conn-BG2, if any, furnished under the Connectivity Regulations shall be returned.</p> <p><b>d) In case the Connectivity is surrendered in terms of option clause (b) of this regulation, Conn-BG1 and Conn-BG2, if any, furnished under the Connectivity Regulations shall be returned.</b></p> <p>Provided that in case the construction of terminal bay has been awarded for implementation under ISTS through CTU, Conn-BG2 furnished under the Connectivity Regulations shall be encashed.</p>	<p>connectivity grantee would be penalized by the CTU invoking this BG amount. However, under the draft regulation which are yet to be implemented, the present connectivity grantees are forced to either surrender their present connectivity, in which case the Conn-BG1 and Conn-BG2 shall be forfeited (if bay construction has been awarded) much earlier than the date which is granted under the connectivity grant. In case where the connectivity grantee wishes to migrate, it will be forced to submit additional BG, amount of which is significant.</p> <p>Further, in case of migration if the connectivity grantee fails to meet the milestones as on "due date", then the exposure on connectivity grantee shall be the amount of Conn-BG1, Conn-BG2 and Conn-BG3, which are not originally factored by the connectivity grantee.</p> <p>Since the connectivity regulations are proposed to be amended, we submit to kindly not to penalize or put additional</p>

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	<u>Remarks</u>
			financial burden on the connectivity grantees awarded with the connectivity under present regulations (i.e., 2009 Regulations) and therefore existing connectivity grantee should be given an option to surrender the connectivity without encashment of BG even if the Bay construction has been awarded. Enactment of new regulation should not be applicable retrospectively and the Connectivity Grantee under the existing regulations should have the continuing rights and obligations without any additional financial burden/ exposure.
35	37.2 (d) In case, the entity exercises the option to convert the Connectivity granted under the Connectivity Regulations as Connectivity under these Regulations in terms of option (i) of clause (a) of this regulation, the Nodal Agency shall, within next 30 days, intimate the amount of Conn BG1, Conn-BG2 and Conn-BG3, to be paid by such entity in terms of Regulation 8 of these regulations, after adjusting bank guarantee, if any, paid by such entity under the Connectivity Regulations.	37.2 (d) In case, the entity exercises the option to convert the Connectivity granted under the Connectivity Regulations as Connectivity under these Regulations in terms of option (i) of clause (a) of this regulation, the Nodal Agency shall, within next 30 days, intimate the amount of Conn BG1, Conn-BG2 and Conn-BG3, to be paid by such entity in terms of Regulation 8 of these regulations, after adjusting bank guarantee, if any, paid by such entity under the Connectivity Regulations.  <b>Provided further that wherever CTU SS locations are not provided in intimation for</b>	Connectivity granted under previous regulation and where SS locations are still not confirmed (but plan is approved and proposed, e.g., Fatehgarh 4), connectivity grantee should not be required to submit Conn-BG3 until SS tentative locations is confirmed.  Similarly, wherever the existing connectivity grant would require ATS as per this regulation, until SS locations is confirmed, applicant

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)





**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

S.N.	Draft Regulation's Existing Clause	Proposed Regulation	<u>Remarks</u>
		connectivity, the Nodal Agency shall also provide the tentative location of the relevant SS (final location should be within 5 kms of tentative location). Until tentative location is provided, Conn-BG3 for connectivity under Regulation 7.1 and incremental Conn-BG2 in case of connectivity under Regulation 7.2 shall not become due.	should not be required to submit additional Conn-BG2.
36	37.2 (f) On furnishing of Conn-BG1, Conn-BG2 and Conn-BG3 under clause (e) of this Regulation, existing agreements between the entity and the Nodal Agency shall be aligned with provisions of Regulation 10.3 of these regulations	37.2 (f) On furnishing of Conn-BG1, Conn-BG2 and Conn-BG3 under clause (e) of this Regulation, existing agreements between the entity and the Nodal Agency shall be aligned with provisions of Regulation 10.3 of these regulations.  Provided further that the due date as per Regulation 10.7 (c) which triggers encashment of BGs should be aligned with timeline for current connectivity approval or Transmission Agreement.	Refer our comment under sl no 12 regarding "due date" becoming part of Connectivity Agreement (Regulation 10.7). How will the "due date" be decided in the Connectivity Agreement for existing connectivity approvals?  The connectivity Grantee should be given an option at the time of execution of Connectivity Agreement to declare a due date after which BGs can be encashed after giving a cooling period of 6 months.
37	37.6. If Connectivity granted in accordance with the Connectivity Regulations is effective and Long term Access has either not been granted for any capacity or has been granted for full/part capacity which has become effective as on the date of coming into effect of these Regulations, the following shall apply:	If Connectivity granted in accordance with the Connectivity Regulations is effective and Long term Access has either not been granted for any capacity or has been granted for full/part capacity which has become effective as on the date of coming into effect of these Regulations, the following shall apply:	As per regulations 4.1 and 17.1 of GNA regulations, generating stations and Buyers are required/eligible to avail connectivity and GNA respectively. Therefore, any entity whose connectivity has been made effective

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

<b>S.N.</b>	<b>Draft Regulation's Existing Clause</b>	<b>Proposed Regulation</b>	<b>Remarks</b>
	(1) Entities covered under Regulation 4.1 of these regulations, which have not been granted Long Term Access for any capacity or granted Long term access for part of the capacity qua the Connectivity quantum under the Connectivity Regulations, may apply for additional GNA for balance quantum of Connectivity under Regulation 17.2 of these regulations. The same shall be processed by the Nodal Agency as under	(1) Entities covered under Regulation 4.1 of these regulations, which have not been granted Long Term Access for any capacity or granted long term access for part of the capacity qua the Connectivity quantum under the Connectivity Regulations, <b>need not apply for GNA and would be required to furnish Conn BG as per Regulation 8</b>	would mean that such entity is generating station and not buyer thereby falling under regulation 4.1 of these regulations. Hence, such generating stations should not be asked to take GNA in case LTA is not granted for partial or full capacity as it would be availed by procurers under regulation 17.1 of these regulations.
<b>38</b>	Regulation 3.2 and 3.3 Application fee for connectivity and GNA increased from INR 3 to 5 lakh + taxes		We request to keep the application fee same as provided in 2009 Connectivity Regulations
<b>39</b>	General Comment		As per Central Electricity Regulatory Commission (Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) Regulations, 2009, its procedure and amendment, Change in location/Technology is not considered as material change. However similar subsequent provisions have not been provided in draft C-GNA Regulation. It is prayed that similar provisions may be provided in the draft C-GNA Regulation.
<b>40</b>	General Comment		Con BG-3 of Rs 2 lakh /MW required towards connectivity of surplus

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)



**NATIONAL SOLAR ENERGY FEDERATION OF INDIA**

Regd. No. 362 / IV of 8 May, 2013

**भारतीय सौर ऊर्जा महासंघ**

पंजीकरण नं 362 / IV - 8 मई, 2013

<b>S.N.</b>	<b>Draft Regulation's Existing Clause</b>	<b>Proposed Regulation</b>	<b><u>Remarks</u></b>
			capacity in <b>existing transmission system</b> . Information about the Existing and Proposed evacuation system should be updated on real time basis by CTU on its website for better utilisation of Transmission assets.

\*\*\*\*\*

Rectangle-1, D-4, Saket District Center New Delhi-110017

Email: [chairman@nsefi.in](mailto:chairman@nsefi.in), [pulipaka@nsefi.in](mailto:pulipaka@nsefi.in), Call: 011-41554149, 011-26215236, +91-7045524937

[www.nsefi.in](http://www.nsefi.in)