

Email

Abhishek Rohilla

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

From : Shilpa Agarwal <shilpa@cercind.gov.in>

Thu, Mar 03, 2022 12:53 PM

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

📎 1 attachment

To : Abhishek Rohilla <abhishek.rohilla@gov.in>, Ratnesh Kumar <ratnesh.cea@gov.in>

From: SGoel@noidapower.com**To:** "Sanoj Kumar Jha" <secy@cercind.gov.in>, "Shilpa Agarwal" <shilpa@cercind.gov.in>**Cc:** TDPierce@noidapower.com**Sent:** Thursday, March 3, 2022 11:57:55 AM**Subject:** FW: Commission invited comments and suggestions on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021

Dear Sir,

Hon'ble Central Electricity Regulatory Commission invited comments and suggestions on the *Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021*. Accordingly, please find attached Comments / Observations / Suggestions of the Company on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 for your kind consideration.

Thanks and Regards

Sanjiv K. Goel

DGM (Corporate Y& Regulatory Affairs)

Noida Power Company Limited

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 **NPCL Comments on GNA.docx**
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Comments/Suggestions of Noida Power Company Limited on the Draft Connectivity & GNA Regulations, 2021

S. No.	Draft Regulations	Comments/Suggestions
1	<p>4. Eligibility for Connectivity to ISTS</p> <p>(a) Generating station(s), including REGS(s), with or without ESS, with an installed capacity of 50 MW and above individually or with an aggregate installed capacity of 50 MW and above through a Lead Generator or a Lead ESS;</p> <p>(b) Captive generating plant with capacity for injection to ISTS of 50 MW and above;</p> <p>(c) Standalone ESS with an installed capacity of 50 MW and above individually or with an aggregate installed capacity of 50 MW and above through a Lead ESS or Lead Generator; (d) Renewable Power Park Developer;</p> <p>(e) REGS or standalone ESS with an installed capacity of 5 MW and above applying for grant of Connectivity to ISTS through the electrical system of a generating station already having Connectivity to ISTS: Provided that such an entity applying for grant of Connectivity to ISTS has an agreement with the said generating station to share its electrical system and dedicated transmission lines, if any.</p>	<ul style="list-style-type: none"> • While the Distribution Licensees can apply for GNA directly to ISTS as per Regulation 17.1(iii), it appears that its name has been inadvertently missed from the list of applicants who can apply for Connectivity to ISTS. • It is suggested to mention Distribution Licensees explicitly in the proposed regulation to avoid any scope of misinterpretation.
2	<p>5 Application for Grant of Connectivity</p> <p>5.1 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</p>	<ul style="list-style-type: none"> • It appears that the proposed regulation inadvertently excluded Distribution Licensees from obtaining dual connectivity. It is proposed to explicitly mention Discoms

	<p>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>to avoid any scope of misinterpretation.</p> <ul style="list-style-type: none"> • It is also submitted that the dual connectivity may have jurisdictional issues in case of dispute between the parties. We, therefore, suggest to implement a new scheme which may be termed a “<i>Composite Scheme for Transmission</i>” on the same lines of “<i>Composite Scheme for Generation</i>”. • If a customer/user is having dual connectivity jurisdiction can be given to Central Commission. Further, any dispute in energy accounting may be referred to Regional Power Committees for resolution.
3	<p>5 Application for Grant of Connectivity</p> <p>5.7 Two or more Applicants may apply for grant of Connectivity at a common terminal bay with an agreement duly signed by such Applicants for sharing the dedicated transmission lines and the terminal bay(s). The applicable Connectivity Bank Guarantee as per Regulation 8 of these regulations shall be submitted by each such Applicant.</p>	<ul style="list-style-type: none"> • A <i>Standard Sharing of Connectivity Agreement</i> should be provided with the Regulations to provide better clarity to parties and minimizing chances of contractual disputes.
4	<p>18 Deemed Grant of GNA</p> <p>18.1. On the date, these regulations come into force, (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:</p>	<ul style="list-style-type: none"> • From the proposed regulation, it may be interpreted that GNA will be based on actual drawal by drawee entities including distribution licensee without the need of any PPA.

	<p>where,</p> <p>“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>	<ul style="list-style-type: none"> • It is kindly suggested to clearly mention that PPAs will not be required for grant of GNA, however, the same will be required to be submitted before scheduling of power. • It is kindly suggested that GNA granted to distribution licensee shall be valid for sale of power as well from the drawal point.
5	<p>22.2. Grant of GNA to entities other than STU 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 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...</p>	<ul style="list-style-type: none"> • It is suggested that while the GNA will be granted based on peak demand in MW, the one-time GNA charges should be based on average drawal for a year. • Alternatively, GNA Charges may be taken for Summer and Winter separately based on average drawal.
6	<p>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:</p>	<ul style="list-style-type: none"> • It is kindly suggested to provide a <i>Standard Sharing of Transmission Capacity Agreement</i> for better clarity and to minimize chances of contractual disputes.
7	<p>31 Standing Clearance for grant of T-GNA 31.1 The application for Standing Clearance from SLDC, for grant of T-GNA, shall be made online for a specified quantum and specified period.</p>	<ul style="list-style-type: none"> • The regulation proposes the requirement of Standing Clearance of SLDC for both bilateral and collective transaction for intra-state entities. It is kindly suggested that a common Standing Clearance should be given by SLDC

		<p>for both bilateral and collective transaction to avoid duplicity of job and fast-track the process. Such Standing Clearance will provide ceiling limit of T-GNA.</p> <ul style="list-style-type: none"> • In other words, the requirement of consent of SLDC individually for bilateral as well as collective transaction should be done away with.
8	<p>31 Standing Clearance for grant of T-GNA 31.2 Where the existence of necessary infrastructure and availability of surplus transmission capacity in the intra-State transmission network have been established, the concerned SLDC shall issue Standing Clearance within three (3) working day of receipt of such application:</p> <p>Provided that when application for Standing Clearance has been made for the first time by an entity, the concerned SLDC shall issue Standing Clearance to the Applicant, within seven (7) working days of receipt of the application.</p>	<ul style="list-style-type: none"> • As the Country has moved to real-time power scheduling, it is kindly suggested that the Standing Clearance must be issued by SLDC within 24 Hrs to fast-track the process.