



Abhishek Rohilla &lt;cerc.abhishek@gmail.com&gt;

---

**Fwd: Comments/suggestions on draft CERC (Connectivity and GNA to the ISTS) Regulations, 2021**

1 message

---

**Abhishek Rohilla** <abhishek.rohilla@delhi.gov.in>  
To: cerc abhishek <cerc.abhishek@gmail.com>

20 February 2022 at 10:27

Regards,  
Abhishek Rohilla  
Dy. Chief (Engg.)  
Central Electricity Regulatory Commission  
3rd Floor, Chanderlok Building,  
36, Janpath, New Delhi-110001

Mb. 9643439120

----- Forwarded Message -----

From: "Shilpa Agarwal" <shilpa@cercind.gov.in>  
To: "Abhishek Rohilla" <abhishek.rohilla@gov.in>, "Ratnesh Kumar" <ratnesh.cea@gov.in>  
Sent: Wednesday, February 16, 2022 11:35:05 AM  
Subject: Fwd: Comments/suggestions on draft CERC (Connectivity and GNA to the ISTS) Regulations, 2021

----- Forwarded Message -----

From: dharmendra gupta <dharmendra.gupta@o2power.in>  
To: Sanoj Kumar Jha <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>  
Cc: rakesh@o2power.in  
Sent: Tue, 15 Feb 2022 22:21:28 +0530 (IST)  
Subject: Comments/suggestions on draft CERC (Connectivity and GNA to the ISTS) Regulations, 2021

Dear Sir,

O2 Power is the fastest-growing renewables platform in India and was jointly established by Temasek (a Govt. of Singapore firm) and EQT Infrastructure (largest European equity fund) to develop utility-scale renewable energy projects with an initial commitment of up to US\$ 500 million. O2 Power was launched in January 2020 and already awarded/acquired ~1.6 GW MW(AC) solar capacity from highly rated customers like NHPC, NTPC, SECI, GUVNL & RUMSL till date and also developing ~1.0 GW C&I / Merchant RE projects. O2 Power is targeting for 4 - 5 GW renewable capacity in next few years.

We sincerely appreciate Central Electricity Regulatory Commission's effort in promoting renewable energy in the country. We are grateful for your continued guidance, and assurance you have offered, in helping the renewable sector progress by enabling a robust and healthy environment to thrive in the country. We would like to thank you for the opportunity to raise our key concerns & suggestions on the Draft CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

We have enclosed our comments / suggestions on the draft Regulations and request to have a stakeholder consultation before finalizing these Regulations.

Thanks &amp; Regards,

[cid:image001.png@01D8229D.93419BF0]  
Dharmendra Gupta  
Deputy General Manager  
Regulatory & Government Affairs  
Phone: +918587044337  
Email: [dharmendra.gupta@o2power.in](mailto:dharmendra.gupta@o2power.in)<mailto:dharmendra.gupta@o2power.in>

O2 Power Private Limited  
8th floor, DLF Square,  
DLF Phase 2, Gurugram - 122002  
[www.o2power.in](http://www.o2power.in)<http://www.o2power.in/>

[Title: LinkedIn - Description: image of LinkedIn icon]<<https://www.linkedin.com/company/o2power/>>[Title: Twitter - Description: image of Twitter icon]<[https://twitter.com/O2Power\\_India](https://twitter.com/O2Power_India)>

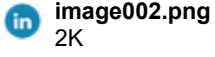
[cid:image004.jpg@01D8229D.93419BF0]

---

**5 attachments**



**image001.png**  
21K



**image002.png**  
2K



**image003.png**  
2K



**image004.jpg**  
7K



**Comments on GNA Regulations\_O2 Power.pdf**  
301K

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
1.	4.1 (e)	<p>Eligibility for Connectivity to ISTS</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:</p>	<p>Eligibility for Connectivity to ISTS</p> <p>(e) REGS or standalone ESS with an installed capacity of <b>1 MW and above</b> applying for grant of Connectivity to ISTS through the electrical system of a generating station already having Connectivity to ISTS:</p>	<p>The draft regulations allowed connectivity for the capacity of 5 MW or above for REGS or standalone ESS with an existing electrical system to promote RE / Storage in the system. Since the above connectivity is associated with existing electrical system and REGS / ESS, it is our suggestion to allow projects for lesser capacity and suggested to consider it from 1 MW and above instead of 5 MW or above.</p>
2.	5.1	<p>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>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><b>Provided that if such an Applicant is a REGS based on a renewable source of energy with Energy Storage System, it may</b></p>	<p>Definition of Renewable Energy Generating Station includes both RE source integrated <b>without</b> energy storage solutions and <b>with</b> energy storage systems. While system without ESS require connectivity to the extent of Installed capacity, systems with ESS doesn't require connectivity for the whole installed capacity, since part of the generation is stored during peak generation and utilized later, depending on the application. There may be cases, where Renewable sources integrated with ESS always injects into grid for less quantum than installed capacity.</p> <p>In most of cases, injection into grid would be a function of Renewable installed capacity and capacity of Energy Storage</p>

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
			<p><b>apply for grant of Connectivity for a quantum less than or equal to the installed capacity.</b></p>	<p>Solution. The injection into grid depends upon the type of contract from the projects (It could be peak hour supply from RE sources or Renewable Energy – Round the Clock supply). Flexibility must be given to applicant to choose the quantum of outflow from the projects.</p> <p>Moreover, such provision is already available for Renewable Hybrid Generating Station. This optimization in connectivity quantum would further help to optimize the subsequent transmission capacity needs to be developed. In view of same, it is requested to suitably amend the Clause to incorporate the desired changes.</p>
3.	5.2	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	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	<p>The draft Regulation is permitting to add connectivity in the existing capacity with a condition to inject power within the quantum of granted connectivity, subject to prior approval of CTU. As developer is restricted to inject power within the limit of existing quantum, the approval must be provided by CTU in a timebound manner to protect the interest of developer.</p> <p>Timeline bound approval from CTU required to be mentioned in the clause, so that generating plant can plan the execution accordingly.</p>

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
		apply to CTU, along with non-refundable application fee of Rs 3 lakh along with applicable taxes;	of Rs 3 lakh along with applicable taxes;  CTU must provide approval in a time bound manner, i.e. within 30 days from the date of intimation	
4.	5.8 (vi)	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	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>  Registry	It is requested to remove condition related to submission of <b>“Registration Number along with certificate issued by the CEA Registry”</b> at the time of for application of GNA.  The submission of application is an initial stage process with an objective to secure connectivity at the earliest. In the proposed requirement, developer will be dependent on the third part (CEA) to get registration number & certificate for submission of application, which may delay the application process of developer.  In view of that request to remove such condition at the time of application for connectivity. CTU may ask such information at the time of signing of Connectivity Agreement in later stage.

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
5.	7.2	<p>In-principle Grant of Connectivity by the Nodal Agency</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>In-principle Grant of Connectivity by the Nodal Agency</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 <b>30 days</b> from the last day of the month in which the application had been received:</p>	<p>The nodal agency will be able to get information within 30 days from interconnection study regarding requirement of ATS or Not in the proposed application. The nodal agency will provide in-principle connectivity within 30 days, in case no ATS is required. However, in case ATS is required, the Nodal agency will provide In-principle grant of connectivity after 60 days with an estimated cost &amp; other details.</p> <p>Since, Nodal agency will be in a position to get update on ATS within 30 days, it is our request to allow In-principle grant of connectivity within 30 days so that developer may be able to work out on further project activities.</p>
6.	7.2	<p>7.2</p> <p>...</p> <p>Provided that intimation for in-principle grant of Connectivity shall include</p>	<p>7.2</p> <p>...</p> <p>Provided that intimation for in-principle grant of Connectivity shall include the ATS &amp; terminal bay(s),</p>	<p>In case of ATS, the regulation should provide a standard amount on per MW basis for submission of BG instead of estimated amount to be determined in 60 days. The objective of BG for ATS is only to get certainty / seriousness from developer as regulation</p>

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
		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:	BG amount of Rs. ---/MW <del>estimated cost of such ATS and terminal bay(s)</del> , minimum design features for dedicated transmission lines to be constructed by the Applicant and the likely date of start of Connectivity:	has provision to return the same after a certain period of Commissioning.  In view of above request to provide a fix / standard amount for BG on per MW basis for ATS so that developer will also get certainty in advance in term of expenses towards BG and helpful to consider the same at the time of bidding.
7.	8.3 (b)	8.3 For cases covered under Regulation 7.2 of these regulations, the following procedure shall be followed:  (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 of Conn-BG2 to be furnished towards ATS	8.3 For cases covered under Regulation 7.2 of these regulations, the following procedure shall be followed:  (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 of Conn-BG2 to be furnished towards ATS and terminal bay(s), <b>equivalent BG for the amount of Rs.--- /MW</b> <del>which shall not exceed the</del>	In case of ATS, the regulation should provide a fix / standard amount for BG on per MW basis, which will help to get a certainty on investment upfront. In addition of that developer will not face any challenges / risk, if applied as a 1 <sup>st</sup> applicant in ATS system.  As per draft regulation, 1 <sup>st</sup> applicant has to pay BG equitant to ATS and may possible that 2 <sup>nd</sup> applicant applies after consideration of ATS for 1 <sup>st</sup> applicant. In such circumstance, both applicants will get connectivity in a same time but 1 <sup>st</sup> applicant has to pay BG for entire ATS in advance.  In view of that we request to provide a fix / standard amount for BG on per MW basis (equivalent to applied quantum for

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
		<p>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: Provided that if such ATS and terminal bay(s) are planned for more than one entity, Conn-BG2 shall be furnished in proportion to the quantum of Connectivity applied for by such entities:</p>	<p><del>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:</del></p> <p><del>Provided that if such ATS and terminal bay(s) are planned for more than one entity, Conn-BG2 shall be furnished in proportion to the quantum of Connectivity applied for by such entities:</del></p>	<p>connectivity) for ATS so that developer will also get certainty in advance as well as well as same treatment for all applicants.</p>
8.	8	Connectivity bank Guarantee:	Connectivity bank Guarantee: <b>For exiting connectivity</b>	The treatment of existing connectivity is same inline of new applicants and have to submit all requisite BGs.



Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
		<p><b>BG required without Associated Transmission System (ATS):</b></p> <ul style="list-style-type: none"> <li>● Conn-BG-1: Rs. 50 lakhs</li> <li>● Conn- BG-2:               <ul style="list-style-type: none"> <li>○ 132 kV – Rs. 2 Cr.</li> <li>○ 220 kV – Rs. 3 Cr.</li> <li>○ 400 kV – Rs. 6 Cr.</li> <li>○ 765 kV – Rs. 12 Cr.</li> </ul> </li> <li>● Conn BG – 3: Rs. 2 Lakh/ MW</li> </ul> <p><b>BG requirement with Associated Transmission System (ATS):</b></p> <ul style="list-style-type: none"> <li>● Conn – BG -1: Rs. 50 Lakhs</li> <li>● Conn – BG – 2: Estimated Cost for ATS.</li> </ul>	<p><b>BG required without Associated Transmission System (ATS):</b></p> <ul style="list-style-type: none"> <li>● <del>Conn BG 1: Rs. 50 lakhs</del></li> <li>● Conn- BG-2:               <ul style="list-style-type: none"> <li>○ 132 kV – Rs. 2 Cr.</li> <li>○ 220 kV – Rs. 3 Cr.</li> <li>○ 400 kV – Rs. 6 Cr.</li> <li>○ 765 kV – Rs. 12 Cr.</li> </ul> </li> <li>● <del>Conn BG – 3: Rs. 2 Lakh/ MW</del></li> </ul> <p><b><del>BG requirement with Associated Transmission System (ATS):</del></b></p> <ul style="list-style-type: none"> <li>● <del>Conn – BG 1: Rs. 50 Lakhs</del></li> <li><del>Conn – BG – 2: Estimated Cost for ATS.</del></li> </ul>	<p>We understand that BG’s requirement is for certainty of commissioning of projects as well as seriousness. However, if developer has secured connectivity, it means either they have LoA from bidding agency OR secured land. In both case developer has made commitment to develop project in term of BG submitted in bidding agency OR investment equity in land.</p> <p>The projects having PPA / LOA are required to be exempted from the burden of BG submission, as these projects have PPA/LOA and in advance stage of development.</p> <p>Hence, projects already having connectivity under PPA/LOA OR Land route, are required to be exempted from Conn BG 2 (ATS BG) and Conn BG 3 for Projects granted connectivity.</p>

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
9.	8.3 (b)	(b) The Nodal Agency, <b>within 6 (six) months of furnishing of Conn-BG1</b> as per clause (a) of this Regulation, shall intimate to such entity, (i) amount 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:	(b) The Nodal Agency, <b>within 1 (one) months of furnishing of Conn-BG1</b> as per clause (a) of this Regulation, shall intimate to such entity, (i) amount 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, <b>which shall not exceed 18 months from date of application unless the date from which connectivity sought is later:</b>	<p>In the current timelines <b>final grant of Connectivity takes 9-10 months in case of ATS requirement.</b> This is not in alignment with RE projects, which by themselves will be required to be commissioning by 18 months.</p> <p>Therefore, the timelines need to be shortened. Nodal agency, in co-ordination with CEA, may do system studies in advance based on the expected generation and demand centers. They should not wait till the applications are made.</p> <p>In view the above, timeline under clause 8.3 (b) shall be reduced to 1 (one) month so that overall timeline for final grant of connectivity is reduced to 4-5 months.</p> <p>Also, the draft regulations didn't stipulate the maximum timeline for firm date of start of connectivity. This may please be restricted to 18 months from the date of application unless the applicant sought it from a later date.</p>
10.	Clause 10.1	An entity which has been intimated the final grant of Connectivity, <b>shall furnish technical connection data,</b> inter		Connection details such as technical connection data, inter-alia, generator data for fault studies, dynamic simulation data, details of data and voice communication must make part of Conn 5 & 6. Instead of asking upfront at the time of connectivity agreement,

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
		<p>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>		<p>such studies and details must be asked in later stage, before the physical connection as current practise.</p>
11.	15.3	<p>Any person which acquires 51% or more shareholding of the company or its subsidiary or affiliate company owning REGS or part thereof in terms of Regulation 15.2, may after COD of such part, apply to the Nodal Agency for transfer of Connectivity. The Nodal Agency shall issue revised grant of Connectivity on submission of applicable Conn-BG2 and Conn-BG3 by such person.</p>	<p>Any person which acquires 51% or more shareholding of the company or its subsidiary or affiliate company owning REGS or part thereof in terms of Regulation 15.2, <del>may after COD of such part</del>, apply to the Nodal Agency for transfer of Connectivity. The Nodal Agency shall issue revised grant of Connectivity on submission of applicable Conn-BG2 and Conn-BG3 by such person. The original grantee may substitute its Conn-</p>	<p>The regulation 15.1 of draft is allowing to split its Connectivity in parts, after COD of such part capacity. However, in the case of Group captive structure, developer may have to split connectivity in initial phase for equity infusion in separate SPVs. In view of that request to allow split / transfer of connectivity before commissioning of project for the name of person / company which acquires 51% or more shareholding of the company or its subsidiary or affiliate company owning REGS or part.</p>

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
		<p>The original grantee may substitute its Conn-BG2 and Conn-BG3 with revised Conn-BG2 and Conn-BG3, to be intimated by CTU. On issue of revised grant of Connectivity, such person shall enter into a fresh Connectivity Agreement and be responsible for compliance with all applicable regulations.</p>	<p>BG2 and Conn-BG3 with revised Conn-BG2 and Conn-BG3, to be intimated by CTU. On issue of revised grant of Connectivity, such person shall enter into a fresh Connectivity Agreement and be responsible for compliance with all applicable regulations.</p>	
12.	16.2	<p>Treatment of Connectivity Bank Guarantee</p> <p>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>Treatment of Connectivity Bank Guarantee</p> <p>Conn-BG2 and Conn-BG3 shall be returned <del>in five equal parts over five years</del> <b>within 3 months of commissioning of</b> corresponding to the generation capacity which has been declared under commercial operation by the Connectivity grantee.</p>	<p>The Regulation 40.1. has provided that “the transmission charges and losses for use of the inter-State transmission system shall be shared among buying entities of ISTS in accordance with the Sharing Regulations.”</p> <p>In any case, generator has no obligation to make payment of any transmission charges and losses after commissioning of project. It is to be noted that RE generators, specifically Wind / Solar generator has no variable cost and in any circumstance Wind / Solar generator will not backout from connected system. In view of that there is no need to hold BGs of such a huge amount for next 5 years, which will create an additional hurdle for Wind / Solar generator to participate in upcoming bids.</p>

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
				<p>In view of above, request to remove the provision to hold Con- 2 &amp; 3 for 5 year and return the same within 3 months of commissioning of corresponding to the generation capacity which has been declared under commercial operation by the Connectivity grantee.</p>
13.	16.3.	<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>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>Provided that any extension granted from bidding agency / RE implementation agency will also provide a liberty to</b></p>	<p>The application of connectivity is an initial exercise to be done after securing project from bidding agency, wherein generator will consider date of connectivity in line of SCOD linked with LoA or PPA. However, there are various Force Majeure events, which provide a relaxation to developer to get an extension of SCoD as the IPP has no control on the FM events. In several cases, the substation where plant needs to be connected is delayed and IPPs are not in a position to commission project on time. In such cases, bidding agencies provide suitable extension after a proper examination of documentary proof OR based on orders issued from Ministry related to respective Force Majeure event.</p> <p>One side IPPs are getting extension and other side said regulation is not permitting to revise connectivity date and applicant is liable to pay transmission charges for mismatch timeline.</p>

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
			generator to revise connectivity date till revised SCOD.	In view of above, request to allow revision of connectivity date, if any extension granted from bidding agency / RE implementation to generator.
14.	Clarification	Applicability of Transmission Charges & losses for OA Consumer to be procured power through ISTS connected Solar / Wind projects		<p>Ministry of Power issued an order on 3<sup>rd</sup> Nov'21 to promote Solar / Wind projects for sale of power through Open Access route, wherein Ministry provided waiver of inter-state transmission charges for the Solar or Wind energy generation to be set up before 30.06.2025 by any person / entity for self-consume or sold to any entity either through competitive bidding, Power Exchange or through bilateral agreement.</p> <p>In view of that if a consumer will purchase power from Wind / Solar project for self-consumption or through bilateral agreement, it will not liable to pay any Transmission Charges.</p> <p>As per Draft GNA, if a buyer is going to procure power under OA route through ISTS network, has to take GNA through STU or direct from CTU and liable to pay Transmission Charges &amp; losses. However, the order issued from MoP is providing a waiver on OA consumer for transmission charges.</p>

Sr. No.	Clause no.	Existing Clause	Revised Clause / New Clause	Rationale
				Therefore, request you to kindly provide a clarification for the treatment of implementation of Transmission Charges on the OA consumer, if they will procure Wind / Solar power from the ISTS connected plants, to be commissioned before 30.06.2025 as they will get waiver on transmission charges in line of MoP order.
15.	Additional comments	Provision related to updated data of existing & upcoming Sub-station		In case of ATS, the generator has to take additional risk of BG amount as well as timeline of sub-station. In such circumstance, it may difficult for generator to participate in bid due to uncertainty and may also face challenges to execute project on time. Therefore, we request for an additional provision for Nodal agency to provide updated data of existing & upcoming Sub-station (require ATS or not) on monthly basis in it's website.
16.	Additional comments	Priority for existing connectivity holder		The regulation is converting all granted connectivity inline of GNA provisions. There are various cases, where developer has secured connectivity based on existing mechanism. In such scenario, we request to provide a clarification that 1 <sup>st</sup> priority must be given for existing connectivity holder to convert connectivity within 30 days in line of GNA Regulations.