



Abhishek Rohilla <cerc.abhishek@gmail.com>

Fwd: Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System)

1 message

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

20 February 2022 at 11:46

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: "Ratnesh Kumar" <ratnesh.cea@gov.in>, "Abhishek Rohilla" <abhishek.rohilla@gov.in>
Sent: Tuesday, February 15, 2022 5:40:02 PM
Subject: FW: Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System)

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

From: Sanoj Kumar Jha <secy@cercind.gov.in>
To: Shilpa Agarwal <shilpa@cercind.gov.in>, Abhishek Rohilla <abhishek.rohilla@gov.in>
Sent: Tue, 15 Feb 2022 17:31:12 +0530 (IST)
Subject: FW: Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System)

From: srxen-plann2@pstcl.org <srxen-plann2@pstcl.org>
Sent: 15 February 2022 15:53
To: Sanoj Kumar Jha <secy@cercind.gov.in>; powerreforms@yahoo.co.in
Cc: spower315@gmail.com; cmd@pstcl.org; srxen-dir-tech@pstcl.org; ce-tl@pstcl.org; se-planning@pstcl.org
Subject: Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System)

Enclosed please find Comments/ Suggestions on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 in respect of PSTCL.

Regards

Sr.XEN/Planning-2,

o/o SE/Planning,

PSTCL, Patiala.

**Comments on Draft CERC GNA Regulations 2021.docx**
22K

PSTCL

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

After scrutinizing the draft amendment regulations, PSTCL (Punjab State Transmission Corporation Ltd.) wishes to submit following comments/ suggestions:-

1. Regulation 18.1

Clause (a) of Regulation 18.1 may be corrected as under:-

Existing provision	Proposed provision
<p>(a) GNA for a (i) State including intra-State entity(ies) and (ii) other drawee entities, shall be the average of ‘A’ for the financial years 2018-19, 2019-20 and 2020-21: where, ‘A’ = {0.5 X maximum ISTS drawal in a time block during the year} + {0.5 X [average of (maximum ISTS drawal in a time block in a day) during the year]}</p>	<p>(a) GNA for a (i) State including intra-State entity(ies) and (ii) other drawee entities, shall be the average of „A“ for the financial years 2018-19, 2019-20 and 2020-21: where, ‘A’ = {0.5 X maximum ISTS drawal of the State/ drawee entity in a time block during the year} + {0.5 X [average of (maximum ISTS drawal of the State/ drawee entity in a time block in a day) during the year]}</p>

Further, **the deemed GNA computed for the State of Punjab at Annexure-1 of draft regulations, needs to be revised after excluding the LTA share of Punjab from BBMB (which is availed through intra-state transmission system of STU).**

It is worth mentioning Punjab is a State with very peculiar load curve with huge demand for 4 months of paddy season (June to September) and lean demand for balance 8 months (October to May) is highly dependent on T-GNA (STOA) during high demand period of 4 months.

As such, it is also proposed that considering the State of Punjab a special case, the GNA quantum for the State of Punjab may be computed in 2 parts i.e. separate for the 4 months peak season of June to September and separate for 8 months lean period of October to May.

2. Regulation 34.1

As per Regulation 34.1, Transmission charge rate for T-GNA, in Rs./MW/time block, for a State shall be published for each month by the Implementing Agency in terms of the Sharing Regulations.

Presently, as per the provisions of CERC (Sharing of Inter State Transmission Charges & Losses) Regulations, 2020,

- No charges for STOA shall be payable by a distribution licensee, which has LTA or MTOA or both.
- The Transmission Deviation Rate shall be levied to a State based on the Transmission Deviation computed as net metered ex-bus injection or net metered drawl in excess of LTA+MTOA.

As per above provisions, Transmission Deviation Charge is applicable for STOA, only if it exceeds the approved LTA+MTOA quantum.

It may be clarified that after implementation of GNA Regulations, **whether the Transmission Deviation Rate/ Charge shall be applicable for the net metered injection/drawl in excess of GNA+T-GNA or for the net metered injection/drawl in excess of GNA only.**

Further if the Transmission Deviation Rate/ Charge shall be applicable for the net metered injection/drawl in excess of GNA only, whether both T-GNA Rate and Transmission Deviation Rate shall be payable for T-GNA (in excess of GNA). Clarification is required.

3. Regulation 34.4

As per prevailing CERC (Open Access in Inter-State Transmission) Regulations, 2008, as amended from time to time, the intra-State entities are liable to pay the transmission charges for use of the State network to the Nodal RLDC for STOA bilateral transactions, which are subsequently settled by Nodal RLDC with respective SLDC. However, no such provision has been incorporated under Regulation 34.4 for T-GNA bilateral transactions.

It may be clarified that whether the Intra State Transmission Charges and SLDC operating charges for T-GNA bilateral transactions shall be collected by Nodal RLDC for subsequent disbursement to concerned SLDCs or SLDC/STU will have to levy these charges directly to the applicant.

4. Regulation 36.3 to 36.6 vs. Regulation 38.1

As per Regulations 36.3 to 36.5, the Transmission Corridor shall be allocated in following priority:-

- i. GNA
- ii. Advance Bilateral T-GNA
- iii. Collective Transaction Day Ahead Market (DAM) T-GNA
- iv. Exigency Bilateral T-GNA

As per Regulation 36.6, after the allocation of transmission corridors under Regulations 36.1 to 36.4 (i.e. GNA, Advance T-GNA and Collective DAM), the balance transmission corridor may be utilised by GNA grantee by way of revision of schedule, as stipulated in the Grid Code, under any contract within its GNA or under Exigency application category or Real time market based on time stamp for such request.

In case the Real Time Market (RTM) applications are to be considered along with Exigency Applications based on time stamp for such request, **Regulation 36.5 (which mentions only Exigency T-GNA) needs to be amended for including Collective RTM transactions** accordingly.

The curtailment priority in Regulation 38.1 is as under:-

- i. Bilateral T-GNA
- ii. Collective DAM T-GNA
- iii. GNA

The curtailment priority may be elaborated to explicitly mention Advance Bilateral T-GNA transactions, Exigency Bilateral T-GNA and Collective RTM T-GNA transactions.

5. It may also be clarified that in case of exigencies e.g. tripping of largest generator in the State, whether State (SLDC) will have the option to approach RLDC/ NLDC for enhancing the T-GNA margin on real time basis.