

RPTCL/2021-22/CERC/128

15th Feb, 2022

The Secretary,
Central Electricity Regulatory Commission,
3rd & 4th Floor,
Chanderlok Building,
36 Janpath,
New Delhi -110 001.

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

Dear Sir,

This has reference to the public notice No. L-1/261/2021/CERC dated 16th December, 2021 for seeking comments or suggestions on "**Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021**" issued by Hon'ble Central Electricity Regulatory Commission.

Accordingly, in this regard, kindly find our observations/comments/suggestions enclosed as Annexure to this letter for your kind consideration.

Thanking You.

Yours faithfully,



Sushanta Basumatary
Chief Manager
(For RPG Power Trading Company Limited)

Enclosed: As stated above

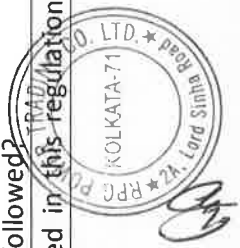
RPG Power Trading Company Limited Comments/Suggestions

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

Sr.no	Regulation	Regulation refers to	Comments/Suggestions
1	5.6	An Applicant may apply for grant of Connectivity at (i) a terminal bay of an ISTS sub-station already allocated to another connectivity grantee or (ii) switchyard of a generating station having Connectivity to ISTS, with an agreement duly signed between the Applicant and the said Connectivity grantee or the generating station having Connectivity to ISTS.	Hon'ble commission may kindly like to specify any standard structure of such agreement mentioning the likely heads of commercial terms for sharing of the connectivity grantee's existing terminal bay.
2	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)	As per the GNA framework, the cost of ATS developed for all the generators shall be borne by all buying entities in proportion to their GNA which will be finally borne by the end consumers. Hon'ble commission may kindly likely to clarify on the aspect of optimization of transmission system under GNA since there will always be some generators who doesn't utilize transmission system either due to lack of PPA or shortage of coal or market price constraints or other reasons.
3	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: Provided that intimation for in-principle grant of	We understand that the cost of supply, erection and commission of ATS that may be required for connectivity will be borne by nodal agency and only the dedicated transmission line will be constructed at the expense of applicant. Hon'ble commission may clarify if our above understanding is correct. In the event if any generator relinquishes its connectivity in future, how the cost of such stranded capacity will be recovered as no



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		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:	collateral from the generator will be held by the nodal agency.
4	15	Transfer of Connectivity	Kindly clarify whether GNA shall also be transferred similar to that allowed for connectivity from parent company to subsidiary and vice versa under regulation 15.
5	17	Eligibility for GNA	Hon'ble commission may please clarify, if a pumped storage hydro and/or ESS generator who also draws power from grid will be eligible for GNA as there may be few cases of for these specific plants as well.
6	17.1(i)	State Transmission Utility on behalf of distribution licensees connected to intra-State transmission system and other intra-State entities	We understand that a Generator which is embedded to state transmission utility will be treated as other intra-state entity. Hon'ble Commission may kindly clarify that in case the intra-state generator intends to supply power to buying entities utilizing ISTS, whether it shall be required to apply for GNA by State transmission utility on behalf of intra-state generator. What will be the procedure for application for such intra state generators and whether the GNA charges are to be paid to state transmission utility or CTU?
7	22.2(a)	Connectivity grantees covered under Regulation 4.1 of these regulations shall be deemed to have been granted GNA, equal to the quantum of Connectivity from the start date of Connectivity.	It is requested Hon'ble commission may kindly consider GNA quantum shall be the quantum of Ex-bus rather than installed capacity for which connectivity granted to the generator and shall pay one time GNA charges of 1 lakh/MW for the ex-bus quantum only. In case the existing generators are to apply for additional connectivity towards balance of capacity (aux.power excluded earlier), what procedure is to be followed?
8	26.1	The following entities shall be eligible as Applicants to	ESS and CPP are being addressed in this regulation, however we



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		<p>apply for T-GNA to ISTS: (a) As buyers,</p>	<p>request Hon'ble commission to address the case of pumped storage hydro plant also. It is requested Hon'ble commission to clarify whether a Generator as an Intra-state entity for sale in bilateral or collective transaction needs to added in this eligible list of applicants.</p>
9	32.1	T-GNA granted under Exigency application category or under Advance application category for a period not exceeding one month cannot be revised.	Hon'ble commission may please allow revision of access (T-GNA) as sought by the applicant, latest by D+2 days. (D= date of application seeking revision) with proper cancellation charges to be borne by the applicant.
10	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.	Hon'ble commission may please allow revision of access as sought by applicant, latest by D+2 days. (D= date of application seeking revision) and thereafter the charges may please be refunded to the applicant after deducting cancellation charges if any applicable.
11	33.3	T-GNA grantee under Advance application category may request to schedule power upto its T-GNA quantum at the time of making scheduling request, before the opening of bidding window for collective transactions under day ahead market for the next day: Provided that in case such T-GNA grantee does not schedule power up to its T-GNA quantum at the time of making scheduling request, the unutilised quantum of T-GNA shall be released for collective transactions under day ahead market, schedule revision by GNA grantees, Exigency applications for T-GNA and collective transactions under real time market in terms of Regulation 36 of these regulations;	<p>In this proviso, Hon'ble commission is requested to kindly consider the T-GNA consent quantum to be deemed scheduled for the T-GNA grantee unless the Grantee is request for change in schedule. This will reduce daily activities for declaring day ahead schedule for each and every transaction by the entities and save time. Otherwise it may become onerous for RLDC's to manage on daily basis.</p> <p>Hon'ble commission may please clarify, whether a T-GNA grantee (buyer) can change its point of injection or the power source, at the time of scheduling under the advance application. This will help in providing power from alternate sources to the buyer under the same T-GNA consent.</p>
12	34.2	Transmission charges for T-GNA, in case of bilateral and collective transactions, shall be payable only at point of	Hon'ble commission may please clarify on this proviso is applicable on drawl schedules or actual drawl by an entity and also whether



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13	37.9	<p>drawal, as per the last published Transmission charge rate for T-GNA for the State where such point of drawal is located: Provided that under collective transactions, transmission charges for T-GNA shall be payable for drawal schedules more than GNA quantum or T-GNA quantum or both, as applicable. Short Term Open Access: (b) On the date of coming into effect of these Regulations, Short Term Open Access applications under the Open Access Regulations pending with RLDC or NLDC shall be closed.</p>	<p>transmission deviation rate (TDR) also will be applicable over and above the T-GNA transmission charges.</p>
		<p>Hon'ble commission may kindly clarify if by closure means grant of T-GNA without having to go for fresh application or otherwise.</p>	

