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| भारतसरकार केन्द्रीयविद्युतप्राधिकरण दक्षिणक्षेत्रीयविद्युतसमिति 29, रेसकोर्स क्रॉस रोड बेंगलूर -560 009 |  | Government of India Central Electricity Authority Southern Regional Power Committee 29, Race Course Cross Road Bengaluru - 560 009 |
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| सं/No. SRPC/MS/2021-22/142 | दिनांक /Date | 13 th January 2022 |

सेवा में / To

सचिव/The Secretary,

केन्द्रीय विद्युत विनियामक आयोग/Central Electricity Regulatory Commission

3 & 4 वी मंजिल, चंदरलोक भवन/3rd & 4th Floor, Chanderlok Building

36 जनपथ/36, Janpath

नई दिल्ली/ New Delhi- 110001

Subject: Comments of SRPC Secretariat on the draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 - Reg.

Ref: CERC Notice no. L-1/261/2021/CERC dated 16.12.2021

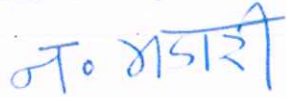
Sir,

Kindly find enclosed the comments of SRPC secretariat on the Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 for consideration please.

Southern Region Constituents requested that a Workshop on the Draft GNA Regulations may be arranged by Hon'ble CERC for better understanding of the Draft GNA Regulations.

SR Constituents observed that the Explanatory Memorandum for the draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021 have not been published by Hon'ble CERC on its website. It is requested that the Explanatory Memorandum for draft GNA Regulations may be also published for clarity on the intent of the various provisions of the draft GNA Regulations.

Yours faithfully,


(नरेश भंडारी /Naresh Bhandari) 13/1/22
सदस्य सचिव / Member Secretary

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

| Sl.No. | Regulation | Modification/addition suggested | Reasons/Remarks |
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| 1 | 2. Definition | <p>“Connectivity Grantee” means a person who has been granted connectivity or is deemed to have been granted connectivity under these regulations;</p> <p>“Buying Entity” means A person who is granted connectivity, GNA, T-GNA under these Regulations.</p> | <p>The definition of Buying Entity & Connectivity Grantee may be inserted.</p> <p>There is a mention of “Buying Entity” in Regulation 40.1.</p> |
| 2 | <p>3.6.</p> <p>All applications for grant of Connectivity received from the Applicants covered under Regulation 4.1 of these regulations, during the month by 2400 hours of the last day of the month, shall be processed together. The inter-se priority of applications shall be accorded as per the date and time of receipt of the application, wherever required.</p> | <p>3.6.</p> <p>All applications for grant of Connectivity received from the Applicants covered under Regulation 4.1 of these regulations, during the month by 2400 hours of the last day of the month, shall be processed together. The inter-se priority of applications shall be accorded as per the date and time of receipt of the application <i>or the date and time of receipt of the application after rectification of deficiencies as the case may be</i>, wherever required.</p> | <p>The priority of applications shall be accorded based on the completeness of the applications so that the applicant will take due care for submission of application first time itself to get the priority.</p> |
| 3 | <p>4.2.</p> <p>Notwithstanding anything contained in Regulation 4.1, the entities having Connectivity shall be eligible, on payment</p> | <p>4.2.</p> <p>Notwithstanding anything contained in Regulation 4.1, the entities having Connectivity shall be eligible, on payment</p> | <p>Nodal agency shall grant the enhancement of</p> |

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| | of application fees, to apply for enhancement of Connectivity of less than 50 MW subject to available capacity in transmission system. | of application fees as given in the Regulation 5.2 of these Regulations , to apply for enhancement of Connectivity of less than 50 MW subject to available capacity in transmission system and grant of enhancement of connectivity by the Nodal Agency | connectivity based on the available capacity in transmission system. |
| 4 | 4. Eligibility for Connectivity to ISTS | <i>The following may be included:</i> 4.4 <i>Details of entities deemed to have been granted Connectivity under these regulations shall be published by the Nodal Agency on its website within 1 (one) month of coming into force of these regulations.</i> | Similar clause as given for deemed GNA may also be included for deemed Connectivity Grantee. |
| 5 | 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 apply to CTU, along with non-refundable application fee of Rs 3 lakh along with applicable taxes; | 5.2 Notwithstanding anything contained in Regulation 5.1, a generating station, with prior approval of CTU Nodal Agency , 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 Nodal Agency , along with non-refundable application fee of Rs 3 lakh along with applicable taxes; | As Nodal Agency has already been defined for Connectivity or GNA. |
| 6 | 8.3 (b) The Nodal Agency, within 6 (six) months of furnishing of Conn-BG1 as per | | 6 months time seems to be too long for |

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| | <p>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</p> <p>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>(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:</p> <p>Provided that in the event of non-intimation by Nodal Agency within six months, the entity shall</p> | | <p>intimation of amount of Conn-BG2, timeline for completion of ATS & Terminal bays and firm date of start of connectivity. This may please be reviewed and reduce the time period.</p> |
| 7 | <p>8.4. Conn-BG1, Conn-BG2 and Conn-BG3 shall be issued by any scheduled commercial bank recognized by the Reserve Bank of India, in favour of CTU, as per the Format stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with</p> | <p>8.4 Conn-BG1, Conn-BG2 and Conn-BG3 shall be issued by any scheduled commercial bank recognized by the Reserve Bank of India, in favour of CTUNodal Agency, as per the Format stipulated in the Detailed Procedure for Connectivity and GNA issued in</p> | <p>As Nodal Agency has already been defined for Connectivity or GNA.</p> |

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| | Regulation 39.1. | accordance with Regulation 39.1. | |
| 8 | <p>9.1. 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: (e) The broad design features of the dedicated transmission lines including voltage level.</p> | <p>9.1 (e) The broad design features of the dedicated transmission lines to be constructed by the Applicant including voltage level. (f) The firm date of start of Connectivity</p> | <p>As per Regulation 7.2 of these Regulations, the firm date of start of Connectivity shall be confirmed at the time of final grant of Connectivity.</p> |
| 9 | <p>10.1. 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> | <p>10.1. 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 etc. as stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1 to the Nodal Agency within a month from intimation of final grant of connectivity</p> | <p>The exhaustive technical details shall be furnished by the entity as stipulated in the Detailed Procedure of the Nodal Agency and also in the timelines specified in the Regulations.</p> |

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| 10 | <p>13. Injection of Infirm Power and drawal of Start-up Power Connectivity grantee shall be eligible to inject infirm power and draw start-up power in accordance with the provisions of the Grid Code.</p> | | <p>The provisions for infirm power injection and drawal of Start-up Power given in the CERC(Grant of Connectivity, Long-term Access and Medium-term Open Access in inter-State Transmission and related matters) Regulations, may be suitably included.</p> |
| 11 | <p>14.1. Interface meters shall be installed by the Central Transmission Utility for and at the cost of the Connectivity grantee and the GNA grantee covered under Regulation 17.1(iii) of these regulations.</p> | <p>14.1. Interface meters shall be installed by the Central Transmission Utility for and at the cost of the Connectivity grantee and the GNA grantee covered under Regulation 17.1(iii), (iv) & (v) of these regulations in accordance with the Central Electricity Authority (Installation and Operation of meters) Regulations.</p> | <p>Interface meters shall be installed by the Central Transmission Utility other than entities covered under 17(i) & (ii).</p> |
| 12 | <p>17.1. The following entities shall be eligible as Applicants to apply for grant of GNA or for enhancement of the quantum of GNA: (ii) A buying entity connected to intra-State transmission system;</p> | <p>17.1 (ii) A buying entity connected to intra-State transmission system; Provided such buying entities shall furnish Standing Clearance from STU to</p> | <p>GNA may be granted by Nodal Agency after getting the Standing Clearance from concerned STU.</p> |

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| | | Nodal Agency. | |
| 13 | <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: (b) GNA computed as per clause (a) of this Regulation is given at Annexure-I to these regulations.</p> | <p>18.1. (a) GNA for a (i) State including intra-State entity(ies) and (ii) other drawee entities as on date of coming into force of these regulations, shall be the average of “A” for the financial years 2018-19, 2019-20 and 2020-21:</p> | <p>In Southern Region, PG-HVDC SR (Gajuwaka, Kolar, Talcher, Pugalur, and Thrissur) is not given in Other entities category of Annexure-I.</p> |
| 14 | <p>18.1 (g) The Central generating stations which are connected to the grid and have not been granted Long term Access under the Connectivity Regulations but whose power is allocated by the Ministry of Power, shall be deemed to have been granted GNA equal to the installed capacity of such generating station(s).</p> | <p>18.1 (g) The Central generating stations which are connected to the grid and have not been granted Long term Access under the Connectivity Regulations but whose power is allocated by the Ministry of Power, shall be deemed to have been granted GNA equal to the installed capacity Ex-Bus capacity of such generating station(s).</p> | |
| 15 | <p>20. Application for Grant of GNA by entities other than STU</p> | | <p>No Bank Guarantee is envisaged from the entities under 17(ii), 17(iii) & 17(iv) despite augmentation of the transmission system would be done for</p> |

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| | | | grant of GNA. <i>Suitable Provisions may be included for Bank Guarantee from the entities other than STU for grant of GNA.</i> |
| 16 | <p>22.2. Grant of GNA to entities other than STU</p> <p>(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> | | There is no mention of the requirement of Conn-BG1, Conn-BG2 and Conn-BG3 for the Entities covered under clause (iii) of Regulation 17.1. <i>Suitable provisions may be included.</i> |
| 17 | <p>23.1.</p> <p>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> | <p>23.1</p> <p>An entity covered under Regulation 17.1 which is a GNA grantee, may authorize 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: The same shall be displayed on the website of the Nodal Agency.</p> | In case of one GNA grantee authorize other entities to use its GNA, GNA quantum for RTA and RTDA shall be different. |

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| | <p>Provided further that for the purpose of calculating the transmission deviation charges under the Sharing Regulations, GNA authorised to be used by other GNA grantee(s) shall be reduced from original GNA grantee that authorised its GNA to be used by other GNA grantee(s) and shall be added to GNA of other GNA grantee(s) which is using it.</p> | | |
| 18 | <p>25.1. For an entity covered under Regulation 17.1, GNA once granted can be relinquished, in full or in part, on payment of relinquishment charges in advance as per following: (a) For an entity covered under clause (i) of Regulation 17.1 of these regulations, STU may relinquish GNA on behalf of identified intra-State entity. The relinquishment charges shall be equal to 60 times the transmission charges paid by such intra-State entity for the last billing month under the Sharing Regulations, corresponding to the relinquished quantum.</p> | <p>25.1 (a) For an entity covered under clause (i) of Regulation 17.1 of these regulations, STU may relinquish GNA on behalf of distribution licensees connected to intra-State transmission system and other intra-State entities. The relinquishment charges shall be equal to 60 times the transmission charges paid by such intra-State entity for the last billing month under the Sharing Regulations, corresponding to the relinquished quantum.</p> | <p>Relinquishment charges may be not applicable for STU if the relinquishment from the deemed GNA granted (from the date of implementation of the GNA Regulations). On behalf of distribution licensees.</p> |
| 19 | <p>26.1. The following entities shall be eligible as Applicants to apply for T-GNA to ISTS: (a) As buyers,</p> | <p>26.1. The following entities shall be eligible as Applicants to apply for T-GNA to ISTS: (a) As buyers,</p> | <p>It may please be clarified whether distribution licensees are entitled for T-</p> |

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| | (i) Distribution licensee directly connected to ISTS; (ii) (iii).... | (i) Distribution licensee directly connected to ISTS & Intra-State Transmission System; Provided T-GNA for a Distribution Licensee may be applied by the concerned SLDC. | GNA? If allowed, Distribution licensees connected to Intra-State Transmission System to be included as modified. |
| 20 | 40.1. 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. | 40.1. 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. Transmission Deviation charges shall be applicable as per the Sharing Regulations. <i>Definition of "Buying Entity" may be inserted under Regulation 2.</i> "Buying Entity" means <i>A person who is granted connectivity, GNA, T-GNA under these Regulations.</i> | <i>It may kindly be noted that Sharing Regulations 2020 are required to be amended in accordance with the terms and the provisions of these Regulations.</i> |
| 21 | 40.4. Deviation charges shall be applicable as per the DSM Regulations. | 40.4. Scheduling of all transactions pursuant to grant of Connectivity, GNA & T-GNA shall be carried out in accordance with the Grid Code. Deviation charges shall be applicable as per the DSM Regulations. | |