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Fwd: Comments on draft CERC(Connectivity & GNA for ISTS) Regulations, 2021

1 message

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

26 January 2022 at 13:57

Regards,
Abhishek Rohilla
Dy. Chief (Engg.)
Central Electricity Regulatory Commission
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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: Tuesday, January 25, 2022 5:07:28 PM
Subject: Fwd: Comments on draft CERC(Connectivity & GNA for ISTS) Regulations, 2021

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

From: asit2505@gmail.com
To: Sanoj Kumar Jha <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>
Sent: Thu, 13 Jan 2022 17:59:39 +0530 (IST)
Subject: Comments on draft CERC(Connectivity & GNA for ISTS) Regulations, 2021

Sir/Maa'm
Please find comments on draft Comments on CERC(Connectivity & GNA for ISTS) Regulations, 2021 on individual capacity. It does not represent the views of the organisation where I work.
Asit Singh
Hyderabad

 **Comments-DraftGNA-AsitSingh.docx**
24K

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

By Asit Singh on individual capacity

Regulation /Page No	As in Draft	Suggestion	Reason/comment
2.1 (ab)/Page 4	<p>“Nodal Agency” means (iii) the agency designated for T-GNA for collective transactions which shall be NLDC, for the purpose of Regulations 26 to 36 of these regulations;</p>	<p>Nodal Agency” means (iii) the agency designated for T-GNA for cross border , interregional and collective transactions, which shall be NLDC, for the purpose of Regulations 26 to 36 of these regulations;</p>	<p>For Cross border and Interregional TTC/ATC, NLDC has major role to play</p>
4.1/Page 6 & 7 22.2 (d)/Page20		<p>New Bulk consumer as defined in 17.1. (iii) needs to apply for Connectivity or not</p>	<p>17.1. (iii) distribution licensee or a Bulk consumer, seeking to connect to ISTS, directly, with a load of 50 MW and above; Connectivity is envisaged in Regulation 12.5</p>
4.1. I/Page 7 5.6/Page 8 5.8(viii)/Page 9	<p>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>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,</p>		<p>The generating stations electrical switchyard charges are inbuilt in the generation tariff for which beneficiaries are identified. When new REGS or standalone ESS will be using the electrical switchyard of the generating it is being utilised by the generating station or some new beneficiary. Per MW usage charge can be considered for using the generation switchyard which can be utilised for reduction in tariff of original beneficiaries.</p>

	(viii) In case of application through Lead generator		
4.2./page 7	Notwithstanding anything contained in Regulation 4.1, the entities having Connectivity shall be eligible, on payment of application fees, to apply for enhancement of Connectivity of less than 50 MW subject to available capacity in transmission system.	Notwithstanding anything contained in Regulation 4.1, the entities having Connectivity shall be eligible, on payment of application fees, to apply for enhancement of Connectivity of less than 50 MW (min of 5 MW) subject to available capacity in transmission system.	To avoid very small capacities at ISTS.
6.1/Page 9	On receipt of applications for grant of Connectivity, the Nodal Agency shall carry out interconnection study as specified in the CEA Technical Standards for Connectivity along with requirement of augmentation to the existing ISTS, if any, for enabling transfer of power over ISTS under General Network Access:	On receipt of applications for grant of Connectivity, the Nodal Agency shall carry out interconnection study as specified in the CEA's Planning Criteria and CEA Technical Standards for Connectivity along with requirement of augmentation to the existing ISTS, if any, for enabling transfer of power over ISTS under General Network Access: Provided the requisite data required will be furnished by the Connectivity Applicant to carry out the interconnection studies and the details/format would be included in Detailed Procedure to be prepared under Regulation 39.1	CEA's Planning Criteria may be included as included in Regulation 21. For carrying out Interconnection data would be required by the Nodal Agency to carry out the various interconnection studies stipulated in CEA's Connectivity Regulations. Data is envisaged at Regulation 10.1 (Connectivity Agreement)
10.8/Page 13	Connectivity grantee shall submit a copy of the signed	Connectivity grantee shall submit a copy of the signed	This information is sometimes required for preparing the

	Connectivity Agreement to the RLDC, in whose control area it is located.	Connectivity Agreement to the RLDC & RPC, in whose control area it is located.	Accounts and sometimes comes as an agenda item in RPC.
10.9/Page13	Connectivity grantee shall comply with the provisions of the CEA Technical Standards for Connectivity.	Connectivity grantee shall comply with the provisions of the CEA Technical Standards for Connectivity & CEA Construction Standards.	To be more specific
14.1/Page15	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.	Interface meters complying to CEA Metering Regulations 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.	To be more specific
14.2/Page 15	Interface meters as installed under Regulation 14.1, shall be open for inspection by any person authorized by the Central Transmission Utility or the Regional Load Despatch Centre in whose control area it is located.	Interface meters as installed under Regulation 14.1, shall be open for inspection by any person authorized by the Central Transmission Utility or the Regional Load Despatch Centre in whose control area it is located and by NLDC for Cross Border Metering points.	For Cross border NLDC has major role to play
15.3/Page 16		Person in para may be replaced with entity/person	
18.1(a)/Page 17			Maximum ISTS drawal includes bilateral and RE drawal also. Is this the intention.
18.1(f)/Page18			LTA and Installed Capacity may be different. Is the intention.
21/Page 19	The Nodal Agency, based on the	The Nodal Agency, based on the	For studies data is required.

	<p>applications received for grant of additional GNA, shall carry out system study in accordance with the Rules and Regulations made under the Act and the CEA Transmission Planning Criteria specified under the Act.</p>	<p>applications received for grant of additional GNA, shall carry out system study in accordance with the Rules and Regulations made under the Act and the CEA Transmission Planning Criteria specified under the Act; Provided data would be furnished by the applicant as sought by the Nodal Agency and the details/format would be included in Detailed Procedure to be prepared under Regulation 39.1</p>	
25/Page 22 & 23		<p>New para in 25 may be added One time GNA charge of Rs. one lakh per MW (or higher rate) for Entities covered under Regulation 4.1 of these regulations shall be forfeited.</p>	<p>There are no relinquishment charges envisaged for generators. Even higher rate can be suggested because ATS is built for these generators and there liability will be over within 5 years (Regulation 16.2)</p>
26.1(a)(iv)/Page 23	<p>Generating station including Renewable Energy Generating Station for meeting its auxiliary consumption or start-up power or for meeting its supply obligations in terms of clause (3) of Regulation 6 of the Power Market Regulations;</p>		<p>It appears that all RE entities, Generators with complete S/D, Generators only availing Auxiliary Power with no schedules have to apply for T-GNA.</p>
28/Page 25-27			<p>It appears that for all bilateral and collective transactions T-GNA has to be applied, it means if the total schedule is less than GNA + Additional GNA</p>

			still the entity has to apply for T-GNA
28.1 & 28.4/Page 25	<p>28.1. T-GNA may be applied for any period from 1 (one) time block and up to 11 (eleven) months.</p> <p>28.4. Application for grant of T-GNA may be made under any of the following categories: A. For bilateral transactions (a) Advance application for grant of T-GNA: Application made on the (D) day for grant of T-GNA starting on or after the (D+3) day, which may fall either in the same month as the (D) day or in the subsequent month. (b) Exigency application for grant of T-GNA: Application made on (D) day for grant of T-GNA with scheduling for (S) day, which may be (D) day or (D+1) day or (D+2) day, with a minimum start time of 7 (seven) time blocks unless specified otherwise in the Grid Code: Provided that the Exigency application for grant of T-GNA shall be made for any time block(s) between 0000 hrs to 2400 hrs of the (S) day. B. For collective transactions Application shall be made by a power exchange as stipulated in the Detailed Procedure for T-GNA</p>	<p>28.4. Application for grant of T-GNA may be made under any of the following categories: A. For bilateral transactions (a) Advance application for grant of T-GNA: Application made on the (D) day for grant of T-GNA starting on or after the (D+3) day, which may fall either in the same month as the (D) day or in the subsequent months.</p>	<p>Is 28.1 and 28.4 contradicting because 28.1 states that T-GNA can be applied for 1 Time block to eleven month while Regulation 28.4 states that it can be applied max upto subsequent month</p>

	issued in accordance with Regulation 39.2.		
28.5(iv), (vii) & (viii)	<p>(iv) Point of injection, if available, or in the absence of the point of injection, the target injection region;</p> <p>(vii) In case the seller is an intra-State entity and the point of injection is available, Standing Clearance of SLDC under whose jurisdiction the point of injection is located: Provided that in case the point of injection and corresponding Standing Clearance of SLDC under whose jurisdiction the point of injection is located is not available at the time of making the application, the same shall be submitted along with the scheduling request in terms of Regulation 33 of these regulations;</p> <p>(viii) In case the seller is a regional entity and the point of injection is not available at the time of making the application, the point of injection shall be submitted along with the scheduling request in terms of Regulation 33 of these regulations.</p>	<p>Point of Injection should be available for LDCs to give Standing Clearance so the clauses that at the time of scheduling Point of injection will be informed may be removed. If the intention is to book the corridor the point of injection should be made available at least 3 days prior to Month(M)-1 of scheduling as 3 days would be required to carry out system studies and as per Regulation 32.1 , T-GNA application cannot be revised within one month.</p>	<p>At the time of scheduling Studies cannot be carried out to allow the access. Therefore point of injection should be available at least 3 days prior Month -1 of scheduling. Entities have sufficient market opportunities to avail like DAM, RTM, Exigency applications to seller within this period.</p>
32.1/Page 30	T-GNA granted under Exigency application category or under Advance application category for a period not exceeding one month cannot be revised.	T-GNA granted under Exigency application category or under Advance application category for a period not exceeding one month cannot be revised by T-GNA Grantee	For more clarity

<p>33.3/Page 31 34.4/ Page 32</p>	<p>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>		<p>Is the same entity expected to make payment for T-GNA Which it had applied for advance application (which cannot be revised as per Regulation 32.1) cannot be utilised as per Reg 33.3 but availed under collective transaction. Is the same entity has to pay for T-GNA if its schedule is less than GNA plus Additional GNA for Bilateral Transaction, Exigency Application and Collective Transaction.</p>
<p>36.1/Page 33</p>	<p>GNA grantee shall be eligible to schedule power within the GNA granted to it under any contract subject to conditions specified in the Grid Code: Provided that in case of constraint in transmission system, the available transmission corridor shall be allocated to the GNA grantees in proportion to their GNA within the region or from outside region and the GNA grantee</p>	<p>GNA grantee shall be eligible to schedule power within the GNA granted to it under any contract subject to conditions specified in the Grid Code: Provided NLDC/RLDC /SLDC would monitor and ensure that schedule (Injection/drawal) are less that total GNA for the entity Provided that in case of constraint in transmission system, the available</p>	<p>Total schedule wrt GNA needs to be monitored to avoid any free usage of ISTS</p>

	shall be eligible to schedule power under any contract within such allocated transmission corridor.	transmission corridor shall be allocated to the GNA grantees in proportion to their GNA within the region or from outside region and the GNA grantee shall be eligible to schedule power under any contract within such allocated transmission corridor.	
5.1/Page 7 15.2/Page 15 18.1(g)/Page 18	It can be studied whether Installed Capacity is the criteria or net ex-bus injection or normative because that is the criteria for ISTS usage and all the power is delivered ex-bus of generating station/renewable park. The Aux power is not using the ISTS neither it can be scheduled to beneficiary so the issue may be considered accordingly.		
Chapter 6 Temporary General Network access Regulation 26 to 35/Page 23-33	All bilateral applications, exigency applications and collective applications are based on available ATC. However the entity is availing the power within the GNA and additional GNA or it requires additional GNA with different timelines for surrendering the GNA it may result in paying GNA charges multiple times. One option is that each bilateral applications, exigency applications and collective applications can come with whether it wants T-GNA on payment or not. If the entity agrees it has to pay the charges in Rs/MW/Block (as per Regulation 34). If the entity wants to bilateral applications, exigency applications and collective applications within GNA & Additional GNA it need not pay the T-GNA charges. While computing the Transmission Deviation only Payment based T-GNA will be considered while non payment based T-GNA will not be considered to compute transmission deviation. Entity is the best judge whether it requires to T-GNA or not.		
