

Email

Abhishek Rohilla

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**Fwd: Submission of Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network.**

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**From :** Shilpa Agarwal <shilpa@cercind.gov.in> Tue, Feb 15, 2022 03:58 PM  
**Subject :** Fwd: Submission of Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network. 📎 1 attachment  
**To :** Abhishek Rohilla <abhishek.rohilla@gov.in>, Ratnesh Kumar <ratnesh.cea@gov.in>

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**From:** "Navdeep Gupta" <Navdeep.Gupta@statkraft.com>  
**To:** "Sanoj Kumar Jha" <secy@cercind.gov.in>, "Shilpa Agarwal" <shilpa@cercind.gov.in>  
**Sent:** Tuesday, February 15, 2022 11:53:58 AM  
**Subject:** Submission of Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network.

Dear Sir/Mam,

With regard to the public notice no. L-1/261/2021/CERC dated 14 Jan 2022 regarding solicitation of comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021. Our comments/suggestions are attached for your kind consideration.

Thanks and regards

**Navdeep Gupta**

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 **Statkraft's Comments on Draft Regulations - CGNA.pdf**  
377 KB



At the outset, Statkraft would like to thank the Honorable Commission to consider proposing the Connectivity and General Network Access to the inter-State Transmission System Regulations, 2021. Honorable Commission has invited comments/suggestions/objections from the stakeholders on the draft regulations. In regard to same we would request Honorable Commissions to please provide further clarity on few points for better understanding of the Connectivity and General Network Access to the inter-State Transmission System Regulations, 2021.

Clause wise clarification sought are submitted as below:

S.No	CERC Draft CGNA regulations	Statkraft's Comments/ Suggestion
1	<p><b>7.2</b> 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>Provided that intimation for in-principle grant of 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.</p>	<p>The proposed mechanism does not mention specific timelines/end date for the completion of ATS within the 60-day period. In our view specific timelines for same can be explicitly defined/mentioned in the regulations itself.</p>

S.No	CERC Draft DSM regulations	Statkraft's Comments/ Suggestion
2	<p><b>8.2 (a)</b>            Conn-BG2 towards terminal bay(s) shall be furnished on the basis of number of terminal bay(s) allocated.</p> <p>Provided that if the entity that has been intimated in-principle grant of Connectivity, (i) proposes to construct the terminal bay(s) on its own under Regulation 12.4 of these regulations, or (ii) seeks Connectivity at a terminal bay constructed or being constructed by another Connectivity grantee, or (iii) seeks Connectivity through electrical system or switchyard of a generating station, no Conn-BG2 is required to be furnished</p> <p>And <b>8.3 (b)</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), 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:</p>	<p>It is hereby observed some deviations in the purpose of BG2. The scope of BG2 is limited to terminal bay(s) only or it includes both terminal bay(s) as well as ATS.</p> <p>It is suggested that clear purpose of BG1, BG2 &amp; BG3 should be mentioned in the regulations.</p>

3.	<p><b>15.2</b> Where the Connectivity grantee is an REGS, it may split its Connectivity in parts, after COD of such part, subject to the minimum capacity in accordance with Regulation 4.1 of these regulations, and submit the installed capacity of each part to the Nodal Agency. In such an event, the Connectivity shall be deemed to have been split in proportion to installed capacity of each such part:</p> <p>Provided that all liabilities and obligations in accordance with these regulations shall continue to remain with the Connectivity grantee for each part</p>	<p>It is understood that part commissioning is allowed for REGS however, more clarity is required as to how this is going to be implemented.</p>
4.	<p><b>22.1</b> Grant of additional GNA to STU  <b>(b)</b> The Nodal Agency shall grant additional GNA to STU based on applications received under Regulation 19.2 of these regulations by 31<sup>st</sup> March of the same financial year, keeping in view the available transmission capacity or timeline of augmentation, indicating the date from which such additional GNA shall be effective. GNA once granted shall remain valid until relinquished.</p>	<p>Further clarity is required on the role and application process when intra-state entities are applicant and when STU acting on behalf of these intra-state entities.</p>
5	<p><b>40. Payment of charges</b>  <b>40.1.</b> 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>As per the proposed draft GNA regulations, the transmission charges, and losses for use of the inter-State transmission system shall be shared among buying entities of ISTS. Since there is no mention of generation technology, its assumed that both thermal and RE power buyers have to pay the transmission charges. This will take away the benefit proposed by MoP to RE generators and it will bring thermal and RE generators at the same level.</p> <p>Clarity is required on ISTS waiver charges for RE power plants which are proposed by MoP.</p>