

Tamil Nadu Transmission Corporation Ltd

(Subsidiary of TNEB Ltd)

Er. T.SUBBARAYAN, B.E.,
Chief Engineer / Grid Operation (i/c),

144, Anna Salai,
Chennai – 600 002.

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

Lr. No: CE/GO/SE/LD&GO/EE/G/AEE/G/AE2/F. GNA/D. 45 /2022, dt. 15.02.2022

Sir,

Sub: Draft CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2021 – Submission of comments / suggestions of TANTRANSCO – Regarding.

Ref: CERC's Public Notice L-1/261/2021-CERC dt 16.12.21

The comments / suggestions / objections on the draft regulations of CERC (Connectivity and General Network Access to the Inter-State Transmission System) Regulations, 2021 with respect to SLDC, TANTRANSCO are given below:

1. Clause (2) of the draft Regulation 2021: - **Definition**

In this clause the clear definition for the "Buying Entity" has to be included.

2. Clause (4.3) of the draft Regulation 2021: - **Eligibility for connectivity to ISTS**

More clarity is needed on clause 4.3, whether intra state transmission system connectivity can be shifted to ISTS or connectivity at both STU and CTU can be availed or generators having connectivity at intra state transmission system can have injection from intra state to ISTS.

3. Clause (17.1) of the draft Regulation 2021: - **Eligibility for GNA**

Under sub clause (ii) of 17.1, it is to be clarified whether DISCOMs are eligible for getting GNA as buying entity or DISCOMs shall get GNA through State Transmission Utility (STU) as per sub clause (i) of 17.1. Further it has to be clarified who are all eligible under buying entity category for getting GNA.

4. Clause (18.1) of the draft Regulation 2021: - Deemed Grant of GNA

Sub clause (a) of 18.1

The methodology adopted in sub clause (a) of 18.1 for arriving the deemed grant of GNA has to be reviewed. Because the deemed GNA has been arrived based on the ISTS drawal which includes the power purchase made through bilateral and exchange under STOA transactions by open access consumers.

In the present Sharing Regulations 2020, the Transmission charges is calculated based on the LTA, MTOA contract and for the drawal above this contract i.e. power purchase made through bilateral and exchange has been paid through transmission deviation charges.

Generally, the transmission system planning and development is based on the LTA projection only, for which the charges are recovered through LTA and MTOA contracted quantum at present. The MTOA and STOA (bilateral and exchange) is being permitted based on the corridor availability in the existing transmission system only and no augmentation of transmission system has been carried out for permitting MTOA &STOA. In such case fixing of deemed GNA based on the maximum ISTS drawl which includes STOA purchase by intrastate entities will not be appropriate.

In the draft Regulations, the deemed GNA is calculated based on the data of maximum actual ISTS drawal by the states in the previous three-years which will be higher than the LTA, MTOA contract for some States and will be lower than the LTA, MTOA contract for some States.

Fixing the Deemed GNA based on the data of maximum drawl in the past three years is not correct since maximum ISTS drawl may occur in some of the time blocks and not in all the time blocks of the year. The ISTS drawal of any State may be reduced / increased in any time block as given below.

- The State whose deemed GNA is higher than the LTA, MTOA contract may draw lesser from the ISTS due to increase in their internal generation availability or any new addition in internal generation.
- The State whose deemed GNA is lesser than the LTA, MTOA contract may draw higher power from the ISTS due to decrease in their internal generation availability.

Further in the draft Regulation, it has been mentioned that once deemed GNA is fixed, it will remain unchanged until relinquishment by STU and to reduce the deemed GNA, huge relinquishment charges has to be borne by the entity.

Hence deemed GNA quantum shall be fixed in a manner such that it should not affect the Discom financially. While fixing deemed GNA to the states/ Discoms, clear methodology may also be defined in the Regulation itself to segregate the LTA quantum of CGS drawn through ISTS network & STU network and Deemed GNA shall be fixed based on the LTA contracted quantum drawn only through ISTS network. Since T-GNA can be availed up to 11 months as per the provisions of draft regulations, MTOA can also be included in T-GNA category.

The share of Tamil Nadu from NLC TS-II Stage-I and Madras Atomic Power Station (MAPS) have been exempted by the implementing agency (NLDC) for the computation of transmission charges for billing month February 2022". Hence in case deemed GNA is fixed based on the methodology proposed in the draft regulations, the drawl from MAPS and NLCTSII Stage-I through STU network shall be reduced from ISTS drawl of Tamilnadu and Deemed GNA shall be refixed for Tamilnadu.

The necessary modifications may also be made in the Sharing Regulations 2020 simultaneously in order to avoid ambiguity while implementation of regulations.

Sub clause (c) of 18.1

In sub clause (C) of 18.1, it has intimated that the "*GNA for States shall remain valid until relinquished in accordance with these regulations*". This indicates that, once deemed GNA is fixed and for any reduction in GNA, relinquishment has to be done by STU which involves huge commercial implications.

For example, as per the draft regulation, if LTA PPA of any state getting expire in near future, then relinquishment has to be done by the state for which huge relinquishment charges has to be borne by the States which will increase the financial burden of the states.

As per the provisions of the prevailing regulations, the transmission system has been developed based on the LTA applications and the transmission charges has to be paid by the respective beneficiaries/States up to the LTA contracted period only. After the contracted period, the States will not pay any charges for reduction in LTA quantum.

Hence it is requested that a provision may be included in the regulation for fixing GNA validity period by considering the LTOA PPA of states or relinquishment may be allowed for the states as and when LTOA PPA expires without any relinquishment charges.

Sub clause (g) of 18.1

In sub clause (C) of 18.1, it has intimated that the *"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)."*

While fixing deemed GNA to the beneficiary states/Discoms, clear methodology may also be defined in the regulation itself to segregate the LTA quantum of CGS drawn through ISTS network & STU network and Deemed GNA for the state shall be fixed based on the LTA contracted quantum drawn only through ISTS network.

Further it is requested that specific methodology may also be included in the regulation for accounting the Transmission deviation for the states for the ISTS drawl only. (i.e. STU drawl points have to be excluded)

5. Clause (25.1) of the draft Regulation 2021: - **Relinquishment of GNA**

Sub clause (a) of 25.1

In the sub clause (a) of 25.1 it has mentioned that the relinquishment charges shall be equal to 60 times the transmission charges paid by such intra-State entity for the last billing month.

Th generators are not honoring their commissioning schedule of their power plants to match with their approved Transmission system/Associated Transmission System (ATS). Hence the Transmission system /ATS are not utilised fully for which the beneficiaries/Discoms have to pay the transmission charges based on their contracted quantum. Whereas States/Discoms are utilising the ISTS network for drawl of their power. Hence the relinquishment charges proposed in the draft regulations may be applicable for the generators and intrastate entities other than Discoms in order to utilise the Transmission system fully and to avoid the under-utilization of transmission system. For the States/Discoms, no relinquishment charges shall be levied for relinquish the Deemed GNA with respect to LTOA PPAs.

Sub clause (b) of 25.1

In the sub clause (b) of 25.1of draft regulations it has been discussed about the balance period of GNA, but the validity period of GNA has not been mentioned in the draft regulations. Hence the validity period for GNA has to be specified.

In the draft Regulations, the period of T-GNA has been specified as 1 time block to 11 months and application fee as Rs.5000/-. It has also been discussed about the standing clearance of SLDC has to be submitted along with -TGNA application.

7. Clause (38) of the draft Regulation 2021: - Curtailment

It is requested to compensate for the GNA and T-GNA guarantee for the curtailment period, since the bulk power transfer policy has been introduced through new draft regulations 2021, as the system must have the full capacity to transfer the power during contingency condition also.

Yours sincerely,

Chief Engineer / Grid Operation (i/c)