



Abhishek Rohilla &lt;cerc.abhishek@gmail.com&gt;

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

1 message

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

20 February 2022 at 11:38

Regards,  
Abhishek Rohilla  
Dy. Chief (Engg.)  
Central Electricity Regulatory Commission  
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----- Forwarded Message -----

From: "Shilpa Agarwal" <shilpa@cercind.gov.in>  
To: "Abhishek Rohilla" <abhishek.rohilla@gov.in>, "Ratnesh Kumar" <ratnesh.cea@gov.in>  
Sent: Tuesday, February 15, 2022 6:40:34 PM  
Subject: Fwd: Tata Power Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

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

From: abhijeet rajendra <abhijeet.rajendra@tatapower.com>  
To: Sanoj Kumar Jha <secy@cercind.gov.in>, Shilpa Agarwal <shilpa@cercind.gov.in>  
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Sent: Tue, 15 Feb 2022 17:50:04 +0530 (IST)  
Subject: Tata Power Comments on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021.

Dear Sir/Maam,

Please find enclosed comments of Tata Power on Draft Central Electricity Regulatory Commission (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021, for your consideration.

Regards,  
Abhijeet Rajendra  
Group Head - Advocacy  
The Tata Power Company Limited, Corporate Center A, 34 Sant Tukaram Road, Carnac Bunder, Mumbai 400 009, Maharashtra, India  
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[X]

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**Tata Power Comments on “Draft Central Electricity Regulatory Commission  
(Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2021”**

S.No.	Clause No & Details	Comments/Suggestions/Clarifications sought	Rationale for Suggestions
1.	<b>Addition of new definition</b>	“An Energy Department/Authorised Agency” - An Energy Department/Authorised Agency of the State as mandated by the State Government for sale of its free/equity power of State Government either at respective Plant Periphery or at respective State Periphery, as the case may be, and energy accounting is either done by the State Load Despatch Centre or Regional Dispatch Centre or any other agency so authorized	In certain States, State Government has authorised its identified departments to maximize the revenue by sale of free/equity power of the State. Therefore, these entities must be covered under regulations to facilitate their own power sale on behalf of the state.
2.	<b>2.1 (c)</b> “Bilateral Transaction” means a transaction, other than collective transaction, for exchange of power between a specified buyer and a specified seller directly or through a trading licensee or at a Power Exchange;	Bilateral Transaction” means a transaction, other than collective <b>or Continuous</b> transaction, for exchange of power between a specified buyer and a specified seller directly or through a trading licensee or at a Power Exchange;	CERC (Power Market) Regulations, 2021 define transactions undertaken at a Power Exchange, which are not Collective Transactions, as Continuous Transactions. The definition may be appropriately enlarged.
3.	<b>5.1</b> “An Applicant, which is a generating station including REGS, shall apply for grant of Connectivity to the Nodal Agency for the quantum equal to the	The Connectivity Regulations 2009 grant connectivity for installed capacity net of Auxiliary Consumption while the draft GNA Regulations will give Connectivity for installed capacity.	The Connectivity for Auxiliary Consumption has not been taken because the existing Connectivity Regulations gives connectivity only for maximum injection.



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	installed capacity of the generating station.....”	<p>It may be clarified that whether generators having connectivity (net of auxiliary power) will have to re-apply for connectivity for quantum equivalent to Auxiliary Consumption?</p> <p>For example – A generator having installed capacity of 1000 MW has connectivity for 950 MW (assuming aux consumption of 5%). Will this generator be asked to take additional connectivity for 50 MW under GNA Regulations or automatic connectivity for 1000 MW be granted to such generator once GNA Regulations are notified.</p> <p>It is suggested that in case generator has to take additional connectivity for 50 MW (in above example), it should not be asked to submit BGs as specified in the Draft GNA Regulations</p>	As the GNA regulations provide for connectivity equal to installed capacity, the existing connectivity should be converted equal to installed capacity and no additional BGs shall be required in cases where generators have been already generating and supplying power to beneficiaries.
4.	<b>5.2</b> Notwithstanding anything contained in Regulation 5.1, a generating station, with prior approval of CTU, shall be eligible to add, within the	As generating station already has the approval of CTU, the requirement here should be that generating station shall be eligible to add additional capacity after <i>informing</i> to CTU and not apply again	



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	quantum of Connectivity granted to it, additional generation capacity, including ESS, and for this purpose, the <b>generating station shall apply to CTU</b> , along with non-refundable application fee of Rs 3 lakh along with applicable taxes;		
5.	<b>General Comment</b>	A generating station including REGS and ESS which has already been granted connectivity shall have flexibility to change source of power, change from generation to ESS, add/ change/ delete ESS or/ and generation source so long as the total quantum of connectivity remains same. However, this need to be informed to CTU about one year in advance of operation of asset	
6.	<b>7.1</b> “.....the Nodal Agency shall intimate in principle grant of Connectivity to the Applicant within 30 days from the last day of the month in which the application had been received along with details such as terminal bay(s), already available or to be developed under ISTS through CTU, <b>and minimum design features</b> for	May be revised as below: “.....the Nodal Agency shall intimate in principle grant of Connectivity to the Applicant within 30 days from the last day of the month in which the application had been received along with details such as terminal bay(s), already available or to be developed under ISTS through CTU, <b>and essential minimum design features</b> for dedicated transmission lines to be constructed by the Applicant.”	



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	dedicated transmission lines to be constructed by the Applicant.”		
7.	<b>8.2 (a)</b> “.....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.....”	This may be deleted.  Construction of terminal bays should be done only by transmission licensees.	The suggestion is made for following reasons:  a. For uniform design and equipment make b. Allowing a second contractor in the substation may compromise cybersecurity c. Modification in the standard design of main contractor d. Exorbitant 15% supervisory charges levied by POWERGRID. Delay by POWERGRID in sharing interface drawings/ data required by the developer in case the bay is given to the developer for construction e. As per TBCB norms, extension work in a substation is granted to the existing licensee without bidding.
8.	<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	Pro-rata division of Conn-BG2 in case of more than one entity shall be done based on Connectivity Applied (in MW)/Substation Capacity (MW) to be built for these entities (excluding any future addition or spare bays) and not	



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	<p>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: Provided that if such ATS and terminal bay(s) are planned for more than one entity, Conn-BG2 shall be furnished in proportion to the quantum of Connectivity applied for by such entities:</p>	<p>based on Connectivity Applied (in MW)/Substation Capacity (MW)</p>	
9.	<p><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 may be clarified that amount of Conn-BG 2, for an applicant shall be calculated in proportion to the installed capacity of such applicant.</p> <p>For ex- An Applicant applies for connecting 500 MW and as part of ATS, transmission licensee decides (keeping in view CEA / CTU transmission planning) to construct a 765 kV line. Further, suppose this is the only applicant at that point of time &amp; other applicants will apply subsequently.</p>	<p>The Applicant which applies first should not be saddled with full cost of ATS</p>



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	<p>Provided that if such ATS and terminal bay(s) are planned for more than one entity, Conn-BG2 shall be furnished in proportion to the quantum of Connectivity applied for by such entities:</p>	<p>In such a case, Conn-BG 2 amount payable by Applicant shall not be equal to full cost of 765 kV line but only should be proportionate to 500 MW</p> <p>Also, ATS should be bifurcated into (i) Common system strengthening &amp; (ii) System strengthening specific to a generator</p> <p>Conn-BG 2 amount should be sum of (i) amount for system strengthening done specifically for a particular generator and (ii) for common strengthening - amount should be in proportion to the connectivity quantum of each generator.</p> <p>Further, system strengthening is usually a multi- purpose exercise such as increasing ATC, correcting poor voltage profile, improving stability, adding resilience, benefitting other entities not part of ATS. The total estimated ATS cost should be reduced by appropriate amount so as not to burden the applicants with an undue amount of Conn BG -2.</p>	



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10.	<b>9.1 (e)</b> The broad design features of the dedicated transmission lines including voltage level.	This may be revised as below: The <b>broad essential</b> design features of the dedicated transmission lines including voltage level.	Instead of broad design features, the transmission licensee shall inform about the essential design features
11.	<b>9.2</b> Where an Applicant has applied for Connectivity at the terminal bay already allocated to another Connectivity grantee or where two or more Applicants have applied for Connectivity at a common terminal bay, final grant of Connectivity as intimated under Regulation 9.1 of these regulations shall be subject to availability of capacity in the dedicated transmission lines.	Where an Applicant has applied for Connectivity at the terminal bay already allocated to another Connectivity grantee or where two or more Applicants have applied for Connectivity at a common terminal bay, final grant of Connectivity as intimated under Regulation 9.1 of these regulations shall be <b>subject to availability of capacity in the dedicated transmission lines @ 90% of the rated capacity of the terminal bay on FIFO basis.</b>	The grant of Connectivity in such a scenario should be @ 90% of the rated capacity of the terminal bay on FIFO basis.
12.	<b>10.6</b> In case of failure to sign the Connectivity Agreement by the entity that has been intimated final grant of Connectivity, as required under Regulation 10.3, the Nodal Agency may extend the time for signing the Connectivity Agreement for a maximum period of 30 days, failing which the final grant of Connectivity	In case of failure to sign the Connectivity Agreement by the entity that has been intimated final grant of Connectivity, as required under Regulation 10.3, the Nodal Agency may extend the time for signing the Connectivity Agreement for a maximum period of 30 days, failing which the final grant of Connectivity shall be revoked by the Nodal Agency under intimation to the Applicant, and the Conn-	If the construction is by the Connectivity Grantee, no Conn-BG-2 is required. To make it clear that the award for construction by Transmission licensee is being referred to, same may be clearly spelt out.





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	<p>shall be revoked by the Nodal Agency under intimation to the Applicant, and the Conn-BG1, Conn-BG2 and Conn-BG3 shall be encashed.</p> <p>Provided that where no construction of ATS or terminal bays has been awarded for implementation, Conn-BG2 shall be returned within a month of such revocation.</p>	<p>BG1, Conn-BG2 and Conn-BG3 shall be encashed.</p> <p>Provided that where no construction of ATS or terminal bays has been awarded for implementation <i>by the Transmission licensee owning the ISTS sub-station</i>, Conn-BG2 shall be returned within a month of such revocation.</p>	
13.	<p><b>10.7 (c)</b> The Connectivity Agreement, inter alia, shall include the following and other details as may be stipulated in the Detailed Procedure for Connectivity and GNA issued in accordance with Regulation 39.1: (a)..... (b)..... (c) Provision that in case of non-payment of transmission charges under Regulation 13 of the Sharing Regulations for more than 3 months from the due date, the same may be recovered by encashing Conn-BG1, Conn-BG2 and Conn-BG3, as</p>	<p>It is presumed here that the start date of connectivity shall coincide with the date of commissioning. As per this Clause, in case generating station could not achieve COD by the date as mentioned in its Connectivity Application, it shall be liable to pay transmission charges as per Regulation 13 of the Sharing Regulations.</p> <p>In this regard following is suggested:</p> <ul style="list-style-type: none"> <li>Generators, while applying for connectivity, should be asked to specify only the month and year by which COD would be achieved (Scheduled COD or SCOD). For</li> </ul>	<p>When connectivity will be applied by the plant or ESS developer the COD would be a rough estimate only.</p> <p>There is little certainty in COD before land acquisition and dedicated transmission. Hence, it is requested that Developer shall be allowed to review COD 6 months before Scheduled COD and may extend it for a period of maximum 3 months</p>



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	required as per provision of Regulation 16.3 of these regulations.	<p>example – Generators may inform that COD would be in March 2023.</p> <ul style="list-style-type: none"> <li>Any penalty on account of delay in COD shall be payable from the month subsequent to the month in which SCOD was to be achieved</li> <li>Generators should be permitted to extend the Scheduled COD for a period of 3 months after giving a notice of 6 months</li> </ul>	
14.	<b>10.8</b> Connectivity grantee shall submit a copy of the signed Connectivity Agreement to the RLDC, in whose control area it is located.	<p>It may be clarified that once the Connectivity Agreement has been signed, RLDC should not again verify the whole scheme and suggest changes.</p> <p>To take care of RLDC requirements, we suggest that a joint committee of Nodal Agency, RLDC, transmission licensee shall be formed, and connectivity shall be granted by this committee</p>	It has been observed that after connectivity agreement is signed and submitted to RLDC for first charge approval, RLDC again vets the whole scheme and suggest changes. This causes delay in project execution. The whole issue can be avoided if RLDC is part of the committee which grants connectivity
15.	<b>11.1</b> Connectivity grantee shall update the status of implementation of work under its scope including dedicated transmission lines, every quarter to the Nodal Agency who shall update the same on its website.	Connectivity grantee shall update the status of implementation of work under its scope including dedicated transmission lines, every <b>quarter month</b> to the Nodal Agency who shall update the same on its website.	As per Clause 11.5, Nodal Agency has to update status of allocation of terminal bays etc. on monthly basis. In case Connectivity grantee is updating the work status on quarterly basis, the update given by Nodal Agency on monthly basis will not be accurate.



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16.	<b>12.1</b> In case Connectivity grantee is a generating station or a captive generating plant or a standalone ESS, the dedicated transmission lines shall be established, operated and maintained by such Connectivity grantee.	For the development of RE generation or ESS projects including PSP projects, it is very important that dedicated transmission length should be small to take care the capital cost as well to avoid the complexities of implementation of long dedicated lines. It is desirable that as done earlier, CTU/CEA plan and develop Green Energy corridors from RE rich areas along with pooling stations. This approach helped in the past that different RE player simply get connected with small line length of dedicated lines. Similar approach should be followed for future RE and ESS projects and Green Energy corridors shall be extended near to location of ESS/ PSPs so that these energy storage projects get connectivity with small dedicated line of about 30- 40 Km	
17.	<b>16.2</b> Conn-BG2 and Conn-BG3 shall be returned in five equal parts over five years corresponding to the generation capacity which has been	The Conn-BG2 & Conn-BG3 should be returned in two equal parts over two years	CON BG 2 and CONBG 3 returning in 5 years will have financial implications. Maintaining BG for such long period particularly when BG amount for large capacity plant is very high.



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	declared under commercial operation by the Connectivity grantee.		
18.	<b>18.1 (g)</b> 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).	The Central generating stations which are connected to ISTS 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). <b>The GNA of free power entitlement may be granted at Generating periphery (similar to untied LTA) with written consent from State DISCOM and not at the State Periphery.</b>	As per prevailing policies, Ministry of Power (MoP) allocates the power along with the free power entitlement power, to the respective States. As per the Hydro Policies, certain State Governments are entitled to get free power along with certain share of power towards Local Area Development Fund (LADF) at the respective Hydro Power Projects (HEPs) periphery. Currently, the free share of power from CGS plants (connected to the ISTS) are scheduled to the state and then State Govt. sell the free power platform in the short-term power market. For sale of such free power in market, State Discom incurs additional Inter State Transmission System (ISTS) charges and losses to bring the free power to respective State boundary. Hence, there is an additional burden on the consumers on sale of power. Hence, it is proposed that the GNA of free power entitlement may be granted at Generating periphery (similar to untied LTA) with written consent from State



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			Discom and not at the State Periphery so that respective State Govt. can make a better decision while scheduling their free power entitlement from the generator periphery. This will also enable customer to avail power at a competitive price and will avoid double ISTS charges.
19.	<b>22.2</b> Grant of GNA to entities other than STU	Timelines for grant of GNU by Nodal Agency has been defined in this Clause. On the same line, guidelines need to be provided to concerned authorities of States for timelines & fair allocation of GNA amongst Intra-State entities.	Timeline for STUs/SLDCs will ensure proper discipline at Intra-State level.  Guidelines for fair allocation would help a transparent mechanism at Intra-State level.
20.	<b>23.1</b> 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:  Provided that payment liability for transmission charges shall continue	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 <b><i>(for one month or a combination of months or any specific season/period within the overall time frame of one year)</i></b> at a time on mutually agreed terms and conditions:  Provided that payment liability for transmission charges <b><i>for such</i></b>	Draft GNA Regulations enable any GNA grantee covered under Regulation 17.1, to authorize other GNA grantee(s) under Regulation 17.1, to use its GNA, in full or in part, for a period not exceeding 1 (one) year. However, payment liability for such transferred GNA quantum remains with original GNA grantee. We suggest that payment liability of such transferred GNA should be with the new GNA holder.



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	to be with the original GNA grantee that authorised its GNA to be used by other GNA grantee(s):	<i>transferred GNA quantum</i> shall <del><i>continue to be remain</i></del> with the <i>original</i> GNA grantee <i>who has availed this additional quantum of transferred GNA that authorised its GNA to be used by other GNA grantee(s):</i>	
21.	<p><b>25.1 (b)</b> For an entity covered under clauses (ii) to (iv) of Regulation 17.1 of these regulations, the relinquishment charges shall be equal to 60 times, the transmission charges paid by such entity for the last month under the Sharing regulations, corresponding to the relinquished quantum.</p> <p>Provided that, if the balance period of GNA is less than 60 months, the relinquishment charges shall be equal to the number of balance months times the transmission charges paid by such entity for the last month under the Sharing Regulations, corresponding to the relinquished quantum.</p>	<p>For an entity covered under clauses (ii) to (iv) of Regulation 17.1 of these regulations, the relinquishment charges shall be equal to <i>the number of balance months of GNA</i> <del>60</del>—times the transmission charges paid by such entity for the last month under the Sharing regulations, corresponding to the relinquished quantum.</p> <p><del><i>Provided that, if the balance period of GNA is less than 60 months, the relinquishment charges shall be equal to the number of balance months times the transmission charges paid by such entity for the last month under the Sharing Regulations, corresponding to the relinquished quantum.</i></del></p>	



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22.	<p><b>26.1</b> The following entities shall be eligible as Applicants to apply for T-GNA to ISTS:</p> <p>(a) As buyers, (i) Distribution licensee directly connected to ISTS; (ii) Bulk consumer directly connected to ISTS; (iii) A buying entity connected to intra-State transmission system; (iv) 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; (v) Captive generating plant; (vi) Standalone ESS .....</p>	<p>The following entities shall be eligible as Applicants to apply for T-GNA to ISTS:</p> <p>(a) As buyers, (i) Distribution licensee directly connected to ISTS <b>or through STU;</b> (ii) Bulk consumer directly connected to ISTS; (iii) A buying entity connected to intra-State transmission system. (iv) 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; (v) Captive generating plant; (vi) Standalone ESS.</p>	<p>Distribution Companies not connected to ISTS directly should also be allowed to apply for T-GNA</p>
23.	<p><b>28.5 (a)(7), 28.6 (a), 28.6 (b)</b></p>	<p>May be deleted</p>	<p>Applicants seeking open access submits application post finalization of contract between Buyers and Sellers. SLDCs issues Standing Clearances post</p>



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			<p>verification of necessary infrastructure as per the provisions of grid code which is proposed to be issued through NOAR. Since the same criteria is being fulfilled while issuing the Standing clearance, hence the declaration as mentioned in may be deleted.</p> <p>As per the proposed draft Regulations, T-GNA applicants can submit the application, even if, the point of injection has not been identified. Due to such provision, State/Private Utilities may book T-GNA for a maximum period of 11 (Eleven) months. Similarly, Open Access consumers, who are dependent on the availability of power at competitive tariff and their demand profile, may not be able to book T-GNA for a longer duration as there could be a huge financial implication on the Open Access Consumer. In order to create a level playing field for all customers, applicants shall be allowed to book the T-GNA only if both the seller and buyer are identified. Hence the provision mentioned in 28.5 (a)(7) and declaration mentioned in</p>





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			28.6(b) of draft Regulations, may be deleted.
24.	<p><b>28.5</b> Application for grant of T-GNA for a bilateral transaction shall contain the following:</p> <p>(a) Advance application category: (vi) Standing Clearance of SLDC under whose jurisdiction the point of drawal is located, in case the buyer is an intra-State entity and; (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:</p> <p>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>Application for grant of T-GNA for a bilateral transaction shall contain the following:</p> <p><b>(a) Advance application category:</b> (vi) Standing Clearance of SLDC under whose jurisdiction the point of drawal is located, in case the buyer is an intra-State entity and; (vii) In case the seller is an intra-State entity and the point of injection is available, Standing Clearance of SLDC <b><i>or deemed to have been issued in terms of Regulation 31.3</i></b>, under whose jurisdiction the point of injection is located:</p> <p>Provided that in case the point of injection and corresponding Standing Clearance of SLDC <b><i>or deemed to have been issued in terms of Regulation 31.3</i></b>, 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</p>	The requirement for application for grant of T-GNA should include the Standing Clearance deemed to have been issued in terms of Regulation 31.3



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	<p>(b) Exigency application category: (vi) Standing Clearance of SLDCs, under whose jurisdiction the point of drawal and point of injection are located, in case the buyer or the supplier is an intra-State entity, as applicable.</p> <p>(b) That at the time of making of the Advance application for T-GNA, if the point of injection has not been identified, availability of necessary infrastructure for time-block wise metering and accounting in accordance with the provisions of the Grid code, appropriate communication system in accordance with the provisions of the Communication Regulations for the point of injection and, the Standing Clearance of SLDC, in case the seller is an intra-State entity, under whose jurisdiction such point of injection is located, shall be submitted along with the scheduling request in terms of Regulation 33 of these regulations.</p>	<p>scheduling request in terms of Regulation 33 of these regulations;</p> <p><b>(b) Exigency application category:</b> (vi) Standing Clearance of SLDCs, <b>or deemed to have been issued in terms of Regulation 31.3</b>, under whose jurisdiction the point of drawal and point of injection are located, in case the buyer or the supplier is an intra-State entity, as applicable.</p> <p>(b) That at the time of making of the Advance application for T-GNA, if the point of injection has not been identified, availability of necessary infrastructure for time-block wise metering and accounting in accordance with the provisions of the Grid code, appropriate communication system in accordance with the provisions of the Communication Regulations for the point of injection and, the Standing Clearance of SLDC <b>or deemed to have been issued in terms of Regulation 31.3</b>, in case the seller is an intra-State entity, under whose jurisdiction such point of injection is located, shall be submitted along with the scheduling</p>	



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		request in terms of Regulation 33 of these regulations.	
25.	<b>28.6 (c)</b> That the Applicant indemnifies the Nodal Agency at all times from any and all claims, actions and all other obligations by or to third parties arising out of or resulting from the transactions under TGNA.	That the Applicant indemnifies the Nodal Agency <del>at all</del> one times from any and all claims, actions and all other obligations by or to third parties arising out of or resulting from the transactions under TGNA. <b>Such provisions may be given as a mandatory requirement in NOAR portal during registration of Grid Connected entities.</b>	one time indemnification may be a mandatory requirement for all grid connected entities during registration in NOAR portal. This is also simplify the process for grant of T-GNA..
26.	<b>31.4</b> Provided that if the aggregate quantum of bid(s) in the power exchange(s) under bilateral transactions and collective transactions by a T-GNA grantee exceeds the quantum of the Standing Clearance in any time block, NLDC shall debar such T-GNA grantee from participating in bilateral and collective transactions for a period of seven (7) days under intimation to the concerned SLDC;	Provided that if the aggregate quantum of bid(s) in the power exchange(s) under bilateral transactions and collective transactions by a T-GNA grantee exceeds the quantum of the Standing Clearance in any time block, <b>NLDC shall send warning message to T-GNA grantee for first time and for repeated occurrences</b> , NLDC shall debar such T-GNA grantee from participating in bilateral and collective transactions for a period of seven (7) days under intimation to the concerned SLDC;	Inadvertently, there is a chance that T-GNA grantee may exceeds the quantum of the standing clearance. So, NLDC may send a warning message to T-GNA grantee. Alternative, NOC Validation may be done by NLDC/Power Exchange(s) against any power tie up under bilateral arrangement. Accordingly, while considering T-GNA grantee’s participation in Power Exchange(s), NLDC/Power Exchange(s) may allow T-GNA grantee to participate up to left over quantum. If required, concerned SLDC, on direction of NLDC, may revise the NOC of the T-GNA grantee for a reduced quantum for next 7 days.



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27.	<b>32.1</b> 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 <b>Exigency application category</b> or under Advance application category <b>for a period not exceeding one month cannot be revised</b> <i>can revised the schedule by giving 2 days notice and shall be liable to pay a penalty equivalent to 2 days Transmission charges.</i>	In case of any unforeseen constraints at GNA Grantee’s end, GNA Grantee likely to draw the partial quantum. As per the proposed Regulations, GNA Grantee can’t revise the T-GNA and will continue to pay the Transmission Charges which will be an additional liability on T-GNA grantee. This will lead to a huge financial burden on the T-GNA applicant. Also, it may discourage the entity to enter into bilateral type contracts. So, revision of T-GNA may be allowed by giving 2 days notice.
28.	<b>32.2</b> 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.	May be deleted	Same as above
29.	<b>33.3</b>	T-GNA grantee under Advance application category may request to	It may be clarified that the T-GNA grantee shall not be required to pay applicable



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	<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:</p> <p>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>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:</p> <p>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><i>Provided further that for the unutilised quantum of T-GNA so released, the T-GNA grantee shall not be required to pay any transmission charges.</i></p>	<p>transmission charges for the unutilized quantum of T-GNA so released.</p>
30.	<p><b>33.1 (d)</b> The scheduling request shall be accompanied by a declaration that there is a valid contract, in terms of</p>	<p>May be replaced by the following: <i>T-GNA quantum granted under Advance application category shall be considered as schedule, which can also be revised subject to Force Majeure / Forced Outage</i></p>	<p>As T-GNA applicant has already submitted the declaration regarding a valid contract during booking of T-GNA corridor, this process will add a repetitive</p>



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	Proviso to clause (d) of Regulation 28.6 of these regulations	<p><i>conditions of a Generating Unit/Station as defined in Grid Code.</i></p> <p><i>Further, The T-GNA quantum approved by the nodal agency in advance may be cancelled or revised downwards by the T-GNA Grantee by giving a minimum two (2) days’ notice, excluding the day on which notice is served and the day from which revised schedules are to be implemented. T-GNA Grantee shall continue to be liable to pay transmission charges as per the quantum originally approved, if the period of revision or cancellation is up to two (2) days.</i></p>	<p>task during scheduling of power. Hence may be deleted.</p> <p>Since quantum granted under T-GNA is for 11 months, scheduling on daily basis like GNA will be a repetitive task for T-GNA grantee. Rather than daily scheduling, T-GNA grantee shall be given an option to revise their schedule as and when required basis as per prevailing Open Access in Inter-State Regulations.</p>
31.	<b>33.2</b> T-GNA granted under Exigency application category shall be considered as schedule, which cannot be revised.	T-GNA granted under Exigency application category shall be considered as schedule, which cannot be revised <b><i>subject to Force Majeure / Forced Outage conditions of a Generating Unit/Station as defined in Grid Code.</i></b>	Provisions shall be given in the Regulations for any revision in schedule during Force Majeure / Forced Outage Conditions of a Generating Unit/Station in order to avoid/reduce UI/DSM implications.
32.	<b>34.2.</b> Transmission charges for T-GNA, in case of bilateral and collective transactions, shall be payable only at point of drawal, as per the last published Transmission charge rate	GNA is being granted at the point of drawal and the transmission charges are also payable at the same point. Clarity may be provided on the impact of transmission losses on such transactions.	



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	for T-GNA for the State where such point of drawal is located:		
33.	<b>34.4 (b)</b> Transmission charges for T-GNA under Exigency application category shall be deposited along with the application. In case the Exigency application is approved for part of the applied quantum or part of the applied period or is rejected, the corresponding transmission charges shall be returned by the next day from the date of approval:	Transmission charges for T-GNA under Exigency application category shall be deposited <b><i>along with the application for T-GNA with the Nodal Agency by (D+2) day, (D) being the day of application for grant of T-GNA.</i></b> In case the Exigency application is approved for part of the applied quantum or part of the applied period or is rejected, the corresponding transmission charges <b><i>excluding the prorated charges for part period or part quantum approved,</i></b> shall be returned by the next day from the date of approval: <b><i>In case already approved T-GNA is curtailed/revised by the nodal agency, the corresponding transmission charges shall be refunded to the applicants.</i></b>	In may happen that the entity seeking T-GNA may submit application during bank closure hours/weekend/holidays. At that time, it may not be feasible for the entity to transfer the requisite amounts. So, necessary changes may be incorporated  In case the Exigency application is approved for part of the applied quantum or part of the applied period the corresponding transmission charges need not be returned.
34.	<b>34.5</b> “In case of default in payment of transmission charges for T-GNA, the TGNA granted shall be cancelled”	<b><i>“In case of default in payment of transmission charges for T-GNA, <del>the TGNA granted shall be cancelled</del> simple interest at the rate of 0.04% for</i></b>	Relaxation may be given to T-GNA Grantee for any default in payment subject to some conditions for making payments.





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		<i>each day of default shall be payable by the T-GNA Grantee”</i>	
35.	<p><b>37.9</b> “Short Term Open Access” (a) On the date of coming into effect of these Regulations, Short Term Open Access granted in accordance with the Open Access Regulations shall be treated as T-GNA under Exigency application category, granted for the term of such Short-Term Open Access.</p> <p>(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>“Short Term Open Access” (a) On the date of coming into effect of these Regulations, Short Term Open Access granted in accordance with the Open Access Regulations shall be treated as T-GNA, granted for the term of such Short-Term Open Access. <i>Provided, All the approved Open Access applications under Advance Reservation / First-Come-First-Serve basis which will be scheduled on and after the (D + 3) day, shall be treated under Advance Application and remaining approved applications which will be scheduled up to (D+2) day, shall be treated under Exigency Application category.</i></p> <p>(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 <del>shall be closed</del> <i>can be withdrawn or converted into applications as made under these</i></p>	<p>As per the proposed clause, all the existing STOA shall be converted to T-GNA under exigency category. In such a scenario, there shall be no revision in schedule even for T-GNA granted up to three months.</p> <p>As mentioned in serial no.5, corridor/schedule revision is proposed to take care of the unforeseen circumstances for T-GNA under advance category. Accordingly, the clause is proposed for modification to take care of the corridor revision.</p> <p>T-GNA Applications submitted by the Applicant to RLDCs/NLDC has been finalised by the Utilities/Open Access Consumers either through the competitive bidding process or through a negotiation among the entities well before the scheduled delivery of power. Therefore, Applicants shall be given a choice to convert/withdraw under the GNA applications. By closing the</p>





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		<i>Regulations either Advance/ Exigency application.</i>	applications at RLDCs/SLDCs end, there is a chance that Buying Entities may face corridor congestion while scheduling the power or may face financial burden due to change-in-law situation.
36.	<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.	It is requested that detailed calculations may be published on how transmission charges will be calculated post implementation of GNA and the amount of charges to be paid by each buying entity	Comparison of transmission charges being paid under current Regulations vis-à-vis to be paid under GNA Regulation is required to understand the impact of GNA
37.	<b>General Comments</b> No Clarity pertaining to the waiver of Transmission Charges for RE Capacity.	As GNA quantum is based on Peak ISTS drawl, RE capacity on which CTU charges are waived off shall get added in overall GNA quantum of beneficiary for working out its total GNA capacity for ascertaining Total Drawl limit from ISTS and capacity to be considered for applicability of Transmission Deviation charges. This will lead RE capacity also getting built up in CTU transmission Charges.	Clarity required pertaining to waiver of Transmission Charges on solar and wind projects in line with Orders issued by Ministry of Power from time to time. As RE capacity is also considered in the total drawal of a DISCOM, clarity needed regarding Treatment of transmission capacity/charges pertaining to RE assets.
38.	<b>General Comments</b>	In case of Generating stations including REGS/ ESS, there may be situation that they are granted connectivity with ATS and there is time gap between COD and ATS. Among these generators there may	



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		be many cases where ATS is not required for immediate connection but is required for power flow in the system beyond connecting point. In such situation there may be possibility that power can flow at the time of actual operation due to conditions at that time and this is being facilitated currently by the grant of STOA. To facilitate this the Generators including REGS/ESS shall be eligible for Temporary GNA.	
39.	<b>General Comments</b>	To take care uncertainty of time line of ATS particularly for REGS/ RHGS/ ESS, Proactive approach in planning is required to plan and develop pooling stations and immediate power evacuation lines from RE rich areas well in advance. These pooling stations and corridors shall also include the transmission corridors for ESS also. This will help in fast development of RE generation and ESS installation without any uncertainties if the time line. Each RE and ESS developer can just plug in and play. This concept will help much needed accelerated development OF RE and	



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		ESS in the country and minimise the uncertainties of RE and ESS developers.	
40.	<b>General Comments</b> Coordination between Deemed GNA of eligible entities under para 4.1 and GNA eligible entities under Para 17.1	The entities are two different entities, and their applications and processing are independent to each other. There is need of coordination so that ATS in both the cases matches in capacity wise and time schedule wise.	
41.	<b>General Comments</b>	Kindly clarify that in case there is a Medium-Term Contract between a distribution company and a Generator through a trader and the power is scheduled in short term basis, Post implementations of GNA, whether Trader/Generator shall have to submit the T-GNA application, or the beneficiary will inform such contract to STU for scheduling of power.	
42.	<b>General Comments</b>	<p>In case Generator has an LTA and is tied up for the LTA capacity with the beneficiary, it is mentioned in the draft Regulations that the LTA is converted in to deemed GNA.</p> <p>In case beneficiary seeks to surrender the granted GNA, we understand, the relinquishment charges shall be payable</p>	



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		by the Beneficiary. In such case, GNA charges shall not be payable by Generators. Kindly clarify.	
43.	<b>General Comments</b>	<p>The draft Regulation is proposing major changes in the Open Access Regulations from 3 month ahead corridor booking to 11 months ahead T-GNA.</p> <p>It is understood that OA consumers are connected to STU and are governed by State Regulations.</p> <p>The success of these Regulatory changes would depend on seamless implementation of similar procedure by State / SLDC.</p> <p>It is proposed that the Inter-State power sale Regulations in State should also be amended simultaneously, with same provision, so that the consumers should also stand same as that of State Utilities and can avail T-GNA up to 11 months.</p>	
44.	<b>General Comment</b>	<p>A standalone ESS will draw electricity from the grid for charging purpose and will also inject power into the Grid.</p> <p>In case when ESS in injecting power into the Grid for supplying to its consumer, the GNA charges would be borne by the consumer.</p>	



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		However, in case a renewable power plant is supplying power to ESS for charging, who will be paying the GNA charges for this transaction? A clarification may be provided	
45.	<b>General Comment</b>	<p>There are ISTS projects already operational where the <i>delivery point is at the periphery of the state procuring RE power</i>. Such ISTS RE power, located in one state and injecting power into another state DISCOM through ISTS was exempted from ISTS charges and losses as per the extant policy on Waiver of transmission charges.</p> <p>With GNA becoming effective at a future date, how would such transactions be made GNA compliant. It should not happen that procuring states start raising transmission bills on RE generator</p>	